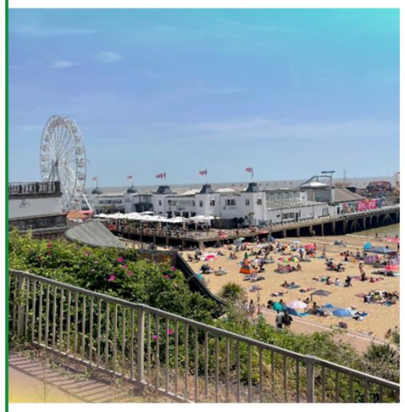








Tendring
District Council

Tendring District Local Plan Review 2025 – 2042 and Beyond
Preferred Options Consultation Document – Schedules of representations and responses

August 2026

Introduction

This document records representations received during consultation on the Regulation 18 Draft Local Plan and the Council's consideration of the issues raised. It is intended to provide a clear summary of consultation responses and to explain how those comments informed the preparation of the Submission Version of the Local Plan. The Council's responses reflect the position reached through plan preparation and the publication of the Regulation 19 version of the Plan.

Some representations have been summarised by Council officers to assist with reporting and analysis. In certain cases, representations have been grouped or reported under a different policy, chapter or section where the comments were considered more relevant to that part of the Plan. The summaries provided are intended to accurately reflect the key issues raised. For any queries regarding the summary or location of a representation within this document, please contact planning.policy@tendringdc.gov.uk.

CHAPTER 2: VISION AND OBJECTIVES

Vision

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
791	3705	Sport England (Mr Roy Warren, Planning Manager) [791]	Given the importance attached to promoting active environments in the Healthy Places chapter of the Local Plan, it is requested that the final part of the vision is amended to include 'providing opportunities for the community to be healthy and physically active' or 'active environments' as an outcome that should be obtained from development. This would accord with paragraphs 96 and 129 of the NPPF and be consistent with the objectives of the successful Essex Local Delivery Pilot in Tendring https://www.tendringdc.gov.uk/content/essex-local-delivery-pilot that is currently being delivered.	Comment	These suggestions are noted and will be included in the updated Local Plan.
926	3833	National Landscape Office (Beverley McClean, National Landscape Planning Officer) [926]	The vision is silent about Tendring District Council's aspirations for the Dedham Vale and Suffolk & Essex Coast & Heaths National Landscapes. . The text currently states 'Residents ....enjoy a variety of landscapes including a tidy coast, the open countryside with its elements of natural beauty'. Natural beauty applies to the elements underpinning the designation of Areas of Outstanding Natural Beauty, not open countryside. As drafted the text is confusing and should be amended to explicitly reference the 2 AONBs in Tendring District. This approach would ensure compliance with Section 85 https://national-landscapes.files.svdcdn.com/production/assets/images/Documents/Briefings/CRoW-s.85-duty-guidance-for-LPAs_NLA-Briefing-Nov-24.pdf?dm=1741185927	Comment	The Council will recognise the significance of National Landscapes in the Reg19 draft of the Local Plan.
349	4284	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	*"Walton will have seen the biggest change following an injection of new housing, holiday accommodation, shops and leisure attractions bringing vitality to the town centre and core visitor areas, with improved medical facilities serving the resident population"* Whilst it is understood that the statement is supposed to be aspirational and forward thinking to the end of the plan period in 2042, it is the ICBs opinion that this could be unintentionally misleading. Whilst we cannot rule out improving health facilities in Walton-on-the-Naze, plans are not currently in any pipeline (more than a small internal reconfiguration of the GP practice to slightly increase capacity). We would not want the local community to misunderstand this aspiration for something more substantial than just that.	Comment	While explicit reference to health facilities has been removed, the aspiration for improved infrastructure in Walton is retained.
1335	4359	Affinity Water Ltd [1335]	The proposed developments by Affinity in Clacton and Manningtree would reuse previously developed land, provide housing to meet identified needs, and are in sustainable locations for development. The sites would contribute towards the housing, towns, and preferred development outcomes referred to in the Vision for emerging TDLPR. No changes are required to the Vision.	Support	Noted.
823	13506	Essex County Council (Rich Cooke,	*Comments on Introduction**	Comment	These suggestions are noted and will be taken forward in the updated Local Plan.

		Principal Spatial Planner) [823]	Section 1, Para 1.3 Page 7 The Local Plan identifies that the district benefits from exceptional landscapes and natural assets, but only mentions the challenges of unemployment, coastal erosion, and the need to provide space for future developments to meet the employment and housing needs of current and future generations. If should also mention the challenges of balancing this with restoring and recovering the district's natural environment in line with government requirements. Suggested addition "...and the need to provide space for future developments to meet the employment and housing needs of current and future generations, together with the ongoing challenge of nature recovery." Section 1, Para 1.12 Additions required for the Regulation 19 Plan. ECC is progressing the replacement of the Essex Transport Strategy (LTP3) with Local Transport Plan 4 (LTP4). The strategic framework was consulted in summer 2024, and the draft plan A Better-Connected Essex was published for consultation in July 2025. Adoption is anticipated in 2026, and its requirements are recommended to be embedded in the Regulation 19 Local Plan. ECC can advise on appropriate content. Section 1, Context (ECC): Para 1.12 & 1.13 Pages 9-10 The full range of ECC roles and responsibilities should be included. This covers the following: Highway and Transportation Authority, including responsibility for the development and delivery of the Essex Local Transport Plan; lead authority for Education including Early Years and Childcare, Special Education Needs and Disabilities, and Post 16 education; Minerals and Waste Planning Authority (MWPA); Waste Disposal Authority (WDA); Lead Local Flood Authority; lead advisor on public health; responsibility for providing and delivering supported and specialist housing (adult social care, children and others); and the Responsible Authority for the Essex Local Nature Recovery Strategy. In terms of ECC as the appropriate Local Authority for Education and Childcare, reference should be made to the mainstream statutory age 10 Year Plan and other appropriate documents for SEND and early years and childcare et al. Section 1, Paragraphs 1.13 - 1.17 Agree - The Mineral and Waste Planning Authority (MWPA) welcome reference to the Minerals Local Plan (MLP) and the Essex and Southend-on-Sea Waste Local Plan (WLP).		
823	13508	Essex County Council (Rich Cooke, Principal Spatial	Section 2, Vision page 15 The vision includes a reference to 'a tidy coast' but it is not clear what is meant by this terminology. The coast is dynamic in nature and changing day by day, with active, natural processes at work, as sediment moves around and is redistributed and certain parts of the coast erode. It would seem more appropriate to use the terminology 'dynamic coast'.	Comment	This comment is noted, and 'a tidy coast' will be reworded for greater clarity in the updated Local Plan. The Council will continue to work with Essex County Council on matters relating to Clacton and Jaywick. The information provided is welcomed.

		Planner) [823]	NB please also refer to ECC School Place Planning comment in this overall response regarding the ECC education sufficiency duty. The following information is provided to inform and support the Local Plan vision and appropriate elements of strategy and policy, as it applies to Clacton and Jaywick (pp14-15). Draft Clacton and Jaywick 2055 Insight report: In December 2025 formative, internal work within ECC fed into the Draft Clacton and Jaywick 2055 Insight report which showcased an evidence base of longer-term solutions to the deep-rooted issues in Clacton and Jaywick. We have since worked to identify opportunities alongside these. Consensus building: Consensus building with Tendring DC senior members and officers began August 2025, reaching consensus on a 30 year road map for Clacton and Jaywick on 15th December 2025. Many of their desired outcomes reflect existing strategies and plans and include interventions funded through Levelling Up funding, Community Regeneration Partnership (CRP) and Pride in Place Programme (PiPP) funding priorities. Final steps towards completion: • May: Finalise and apply branding to Clacton and Jaywick 30 year road map and publish. ECC welcomes the Vision's commitment to green and blue infrastructure, a landscape-led approach, urban greening, biodiversity net gain and nature recovery. We also support Objectives 4 and 8, which seeks to deliver an integrated and connected multifunctional green and blue infrastructure network aligned with the Essex Local Nature Recovery Strategy and delivery biodiversity net gains.		
850	13615	Marine Management Organisation (Marie Canny) [850]	Page 10: within the 'context' section of the introduction to the local plan review, we would recommend you mention the South East Marine Plan and its remit here. As mentioned above, all public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan. Within the Local Plan we would recommend reference to the marine and intertidal element of the area, particularly where both terrestrial and marine habitats have the potential to be impacted by the Local Plan. We would also recommend a reference to the requirement of a marine licence for certain activities carried out within the UK marine area (as outlined in the Marine Licensing section above) within this section. We would recommend you use the south east marine plan policies as evidence to support your local plan's policies. This would add additional evidence to your plan and ensure alignment with the South East Marine Plan. As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information: South East Marine Plan and Explore Marine Plans.	Comment	This representation is noted. The Local Plan has been updated to reference the South East Marine Plan in paragraph 1.18. The Marine Plan is also mentioned in paragraph 9.99, as well as Policy PPL2.
148	14457	Environment Agency (Environment Agency) [148]	We agree with the vision statement for the Tendring District and Objectives 1,2 and 3.	Comment	Noted.

826	14505	Essex Wildlife Trust (Annie Gordon) [826]	The Trust, as a key partner in the development of the Essex LNRS, has a particular interest in ensuring that the Local Plan provides a robust framework for LNRS delivery. We welcome the fact that the LNRS is referenced in PPL4, PPL4a, and the individual site allocation policies for most of the major allocations. The requirement that development proposals 'must be designed to enable and support the habitat priority measures identified in the Strategic Opportunities set out in the Essex LNRS' is a positive commitment, and we will seek to ensure this is translated into meaningful on-the-ground outcomes. However, we have significant concerns about the depth of LNRS integration in the plan as a whole. The Essex LNRS is referenced on only eight occasions in the main plan document. For a plan of this scale and environmental sensitivity, and for a District in which the LNRS identifies numerous strategic opportunities for habitat creation, restoration, and connectivity enhancement, this is insufficient. The LNRS should be more systematically embedded in the spatial strategy, in the countryside and rural landscape policies, in the green gap designations, and in the ecological requirements for all major allocations — not just the largest ones. More fundamentally, the plan does not include a spatial representation of LNRS priorities. The LNRS identifies specific focus areas and strategic opportunities for habitat enhancement within Tendring — including coastal habitat restoration, grazing marsh connectivity, hedgerow and woodland network enhancement, and wetland creation opportunities in the rural interior. These spatial priorities should be mapped alongside the plan's allocation maps, LoWS network, and priority habitat data to create a coherent picture of the ecological network that the plan is seeking to protect and enhance. Without this spatial framework, there is no mechanism to assess whether the plan's growth strategy is compatible with LNRS priorities, or to direct off-site BNG to the most beneficial locations. We recommend that the Council, in partnership with the Trust and Essex County Council, prepares a Green Infrastructure and Nature Recovery Strategy and associated spatial map for Tendring, and that this document is adopted as a Supplementary Planning Document to support the Local Plan. This would provide the spatial framework needed to give meaningful effect to the plan's LNRS commitments and would ensure that BNG, habitat banks, and GI provision associated with major allocations are directed to the most strategically important locations for nature recovery in the District.	Comment	The suggestion to reference the Essex LNRS is noted. The Council refers to the Essex Green Infrastructure Strategy, and thus, it is not considered necessary to develop another strategic GI policy for Tendring, more specifically.
Businesses, Landowners and Developers					
1215	3902	Pigeon [1215]	The Vision for the Tendring District places a heavy reliance on Tendring Borders Garden Community and new Garden Villages for the delivery of growth, including new housing, during the Plan period. The Vision should acknowledge the potential to accommodate new housing within and adjacent to the district’s existing sustainable settlements, such as Clacton-on-Sea (including Holland-on-Sea), providing for a mix of sites, to ensure that the Plan is sound.	Object	The spatial strategy set out in SPL1 of the Local Plan seeks to establish a balanced approach to housing growth - allocating land for proportionate settlement expansion to meet short term needs, while allocating larger strategic developments (including the Garden Community and Garden Villages) to meet longer term needs. This approach is considered to be robust and has been tested through the Sustainability Appraisal process.
1002	3958	George Thompson Limited [1002]	Spencer Planning Limited acts on behalf of George Thompson Limited, the owner of 4.33 hectares (ha) of land to the northeast of Wix Road, Great Oakley (ref. MSA15), as set out on the accompanying Site Location Plan (drawing no. Y21680-01).	Support	Noted.

			Our client supports the Vision in the Local Plan Preferred Options document, including its aim to provide high-quality new housing to meet local needs and to enable new housing development in some of the District's villages to help support local shops and services and to address local issues.		
705	4043	Mr Peter Le Grys [705]	Based on the plans from the Elmstead Garden Village Community, the schemes are unlikely to be either 'garden' orientated nor a village community but New Towns within the countryside.	Object	The representation is noted. The Garden Village proposals are intended to deliver new communities in accordance with recognised Garden City principles, including high-quality design, green infrastructure, accessible services and facilities, and opportunities for sustainable travel. Whilst the developments would constitute new settlements within the countryside, the Local Plan seeks to ensure they evolve as well-planned, self-contained communities rather than conventional urban extensions. No modification is proposed.
1336	4306	Pigeon [1336]	The proposed development by Pigeon at land off Cockaynes Lane in Alresford would provide housing to meet identified needs and is in a sustainable location for development. It would contribute towards the housing, larger villages, and preferred development outcomes referred to in the Vision for emerging TDLPR. No changes are required to the Vision.	Support	Noted.
1406	4342	The MacDonald Family (Ravens Green) [1406]	Our clients support the Vision in the Local Plan Preferred Options document, including its aim to create: communities with job opportunities across a variety of employment sectors and other important services and facilities; and, new strategically located and comprehensively planned Garden Village developments at Hare Green, Horsley Cross and Weeley, to meet the needs of a growing population.	Support	Noted.
1409	4355	The MacDonald Family (Frating) [1409]	Our clients support the Vision in the Local Plan Preferred Options document, including its aim to create: communities with job opportunities across a variety of employment sectors and other important services and facilities; and, new strategically located and comprehensively planned Garden Village developments at Hare Green, Horsley Cross and Weeley, to meet the needs of a growing population.	Support	Noted.
1422	4384	M Scott Properties Ltd (Scott Properties) [1422]	Support the vision for Harwich, Freeport East and the A120 Corridor which sets out that Freeport status will drive private investment and new jobs in industrial activities, logistics and emerging green energy sectors with new developments at Bathside Bay and Horsley Cross with good access to the A120 and the local population. In order to meet the needs of a growing population we support the new strategically located and comprehensively planned Garden Village development at Horsley Cross and the principle of providing necessary infrastructure and services which reflects the National Planning Policy Framework (NPPF) 2024 objective of achieving sustainable development.	Support	Noted.
1638	4408	Lichfields (Amy Jones, Planner) [1638]	In general terms, our client supports the principles of the proposed overall vision for Tendring as a vibrant, healthy and attractive place, with communities that offer a range of high-quality of new housing that meets local needs, through delivery of development that is sustainable in terms of location, use and form.	Comment	Noted.
431	4437	Welbeck Strategic Land [431]	The plan end date should be 2043 and the Garden Villages should be deleted in favour of allocations on the edge of existing settlements, such as Lawford and Great Bentley.	Object	The Council agrees that the Plan Period should be extended to 2043. However, the Council does not agree that the proposed Garden Villages should be deleted in favour of allocating additional land solely on the edge of existing settlements. The spatial strategy set out in the Local Plan seeks to establish a balanced approach to housing growth, allocating land for proportionate settlement expansion to meet shorter-term needs whilst also identifying larger strategic developments,

					including the Garden Community and Garden Villages, to meet longer-term development requirements. This approach is considered robust and has been tested through the Sustainability Appraisal process. No further modification is proposed.
1439	4467	Catesby Estates [1439]	Catesby continue to support the Vision for the Future of Tendring.	Support	Noted.
119	14053	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	HBF notes that while the draft NPPF currently carries no weight, its forthcoming adoption will affect the soundness and weight of Local Plan policies. Once published, any local plan policies inconsistent with the new NPPF decision-making policies should be given very limited weight unless examined against the new framework. HBF argues that policies exceeding national standards should be removed to avoid redundancy and uncertainty. Although the Duty to Co-operate is being removed, plans must still demonstrate effective cross-boundary working, particularly in addressing any unmet housing needs, for the plan to be considered sound.	Comment	The Council is currently working with Essex County Council and neighbouring authorities to collaborate on infrastructure provision and cross-boundary development. A Statement of Cooperation will be published alongside the Local Plan. Policies within the Local Plan are supported by a robust evidence base which demonstrates them to be both necessary and deliverable. In the case of net zero policies, which seek to exceed national standards, consistency with authorities across Essex will bring greater certainty for developers operating within the county.
795	14295	Boxford Suffolk (Farms) Ltd [795]	The emerging Local Plan should enable residents to 'Age in Place' within the rural communities they call home, and the absence of this concept or acknowledgement of its importance is noticeable. It is proposed that an additional outcome is added to this end, for the clear benefits that ageing in place provides. These include a counteracting force to otherwise increasing levels of social isolation, a furtherance of resident's independence, and the maintaining of community resilience. The consequences of not facilitating these changes and options for people are equally, if not more important than the benefits, and serve only to weaken village vitality. If the Council are to commit to their vision and high-level ambitions as stated in this consultation Document, and take the necessary steps towards accomplishing this, a greater number of employment sites ought to be allocated.	Comment	This comment is noted. The Council agrees that residents should be able to continue to live within their local communities as they age, and the Local Plan contains policies, such as LP2 (Housing Choice) and LP9 (Care, Independent and Assisted Living), which seek to support a range of housing options to mee the needs of different groups within the population. With regard to employment provision, the Council has undertaken an updated Employment Land Review, and the Local Plan allocates land in excess of identified need. This reflects the Council's ambition to support economic growth, attract inward investment, and provide opportunities for existing businesses to expand and thrive, while ensuring that employment opportunities are distributed across the District.
1718	14319	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning support the thrust of the Plan's vision, in particular in respect of the approach to Harwich, Freeport East and the A120 Corridor. Given the opportunity provided by Freeport East, the housing and economic opportunities along the A120 corridor should be embraced to deliver regeneration to the wider area.	Support	Noted.
1462	4484	Latimer (Tendring Colchester Borders Garden Community) Developments Limited [1462]	Latimer supports that the TCBGC is noted as a key part of the vision for Tendring, for the plan period. Broadly, the text aligns with Latimer's intention to deliver a high quality, landscape-led Garden Community to the benefit of both Tendring and Colchester; however, Latimer would request the following wording changes, for clarity and to ensure alignment with the adopted DPD and national policy: "…A new Garden Community will be developed to the east of Colchester, developed in accordance with the adopted, site specific a detailed Development Plan Document (DPD)…" "The Garden Community will provide necessary infrastructure and facilities, as agreed via the planning application, and a high quality of built and urban design, taking a landscape-led approach."	Comment	These wording suggestions are noted, and some will be taken forward in the updated Local Plan.

			"With major investment in There will be improved rapid transit (bus) services to Colchester the City town centre, pedestrian and cycle connections and a new link road between the A120 and A133, the management of any traffic impact congestion will have been managed improved ... "It will provide the right balance of jobs, in response to market demand and need, housing and infrastructure in the right locations and will attract residents and businesses who value innovation, community cohesion and a high-quality environment, and who will be provided with opportunities to take an active role in managing the community to ensure its continuing success" The term 'innovative' is not measurable and is ambiguous: "Residents will live in high-quality and innovatively designed homes, which accommodate a variety of needs and aspirations and are located in well-designed neighbourhoods where they can meet their day-to-day needs." "Central to this will be the comprehensive planning and development of the garden community, and the aligned delivery of homes and supporting infrastructure, to be phased as may be agreed and necessary.		
1692	14342	Lewis & Scott Homes [1692]	The vision for the plan is expressed in section 2 and is largely similar to the vision of the adopted plan. Given the age demographics and the needs identified in the SSHANA and the SHMA, we believe that the vision should make explicit reference to meeting the needs of the older population. As such we OBJECT to the current wording on the basis that it does not adequately address the requirements of national policy to ensure that all plans meet the needs of groups with specific housing needs, which includes older people (para 61 and 63 of the current NPPF, policies HO1 and HO5 of the emerging draft NPPF as well as the passages of the NPPG referred to in the introduction to this statement). (See attached document for proposed wording changes)	Object	Whilst these concerns are noted, the Vision does contain explicit reference to meeting the needs of older and retired residents. Therefore, it is not considered necessary to add additional text to the Vision.
53	14371	M Scott Properties Ltd [53]	Scott Properties generally supports the Vision and Objectives of the Draft Local Plan but considers they should extend further into the future. While recognising the commitment to the Tendring Colchester Borders Garden Community, concerns are raised about delivery delays and increased reliance on major infrastructure, particularly following the cancellation of the A12 widening project. Although the inclusion of proposed Garden Villages is not opposed, it is noted that developments of this scale often face delivery challenges, with infrastructure requirements making them slow and potentially unreliable in providing much-needed housing.	Support	Concerns regarding the realistic deliverability and soundness of the Garden Villages are understood and noted by the Council. Based on evidence from the Infrastructure Delivery Plan and transport modelling, and in consideration of representations received, delivery of the Garden Villages has been pushed back further into the plan period to allow for uncertainty around timescales. This amendment will allow for a more flexible timeframe for the initial planning work, including the preparation of Development Plan Documents (DPDs) and determination of planning applications.
54	14389	M Scott Properties Ltd (Mr Richard Martin, Director) [54]	We consider that the Draft Local Plan is not sound as it has not identified sufficient land to meet the Council's housing requirements across the Plan period. There is an overreliance on the potential housing delivery from the Garden Villages and other larger allocations, and the Draft Local Plan has failed to consider the reasonable alternative of allocating additional land in the Rural Service Centres. It is not considered that reasonable justification has been provided for the exclusion of Land between Frinton Road and Landermere Road, Thorpe-le-Soken as a residential-led allocation with land for education uses.	Object	The Council has always acknowledged that the housebuilding requirement for Tendring generated with the Government's standard methodology calculation is over-ambitious, and that this target will be challenging, if not impossible, to achieve. Currently, the Council's provisional approach is to delete certain housing sites within the Reg18 draft of the Local Plan and to adjust assumptions around the deliverability of others (in particular the Garden Villages), which would

			(See attached documents)		result in the headroom contingency level falling from 1,500 homes to around 300.
982	14414	Turley (Claire Newbury, Associate Director) [982]	Catesby generally supports the vision for Tendring, particularly the aspiration that the District will be an 'attractive place to live' and 'offer a range of high-quality new housing that meets local needs'. The Plains Farm Site offers an excellent opportunity to contribute to this vision via the provision of high-quality new market and affordable homes in a highly sustainable and attractive location. Catesby considers that the wider Vision for Tendring should also include reference to the opportunity for sustainable homes in the Colchester fringe area, not just in the context of the Garden Community, acknowledging that other well situated sites at the urban fringe should also be the focus for proportionate scales of development.	Comment	Whilst this representation is acknowledged, adding a reference to homes in the Colchester fringe area would not be consistent with the spatial strategy and settlement hierarchy set out in policy SPL1.
1708	14429	H D Cobbald & Sons Ltd [1708]	See attached doc for full comments on Introduction and Vision	Comment	Support for the Introduction and Vision text is noted.
Community Representatives					
1742	14547	Colchester City Council (Planning Policy)	CCC express support for TDC's Regulation 18 Plan. Looking ahead, both authorities are committed to continue to work together on cross boundary issues and to prepare a Statement of Common Ground. This will support the effective progression of each council's Local Plan towards examination and ensure continued alignment on strategic matters.	Support	Noted.
244	13649	Ardleigh Parish Council (Ardleigh Parish) [244]	Community Engagement The Parish Council considers current consultation processes insufficient. Request: Greater transparency in how feedback influences decisions Ongoing engagement through workshops and collaboration with parish councils	Comment	Concerns with regard to the consultation process are noted. The intent of this document is to display how representations are considered and how they influence changes to the Local Plan. The Council aims to encourage as much participation as possible from all stakeholders, including Parish Councils, by hosting in person events and giving respondents multiple ways (paper, email, or online) to respond to the Local Plan consultations. The Council will continue to work with Parish Councils and local communities where appropriate.
258	13593	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	Vision While we recognize the legal necessity for a plan-led approach to protect our district from speculative development, we wish to express significant concern shared by many of our residents regarding the proposed scale of housing. -Mandatory Targets: The increase from 550 to 1,063 homes per year is a nearly 100% rise that will place unprecedented pressure on every community in Tendring. -Infrastructure Deficit: we are deeply concerned that existing infrastructure – specifically roads, healthcare, and schools – cannot sustain this level of growth without immediate, front-loaded investment. -Plan Adoption: Despite these concerns, we support the formal allocation of land within a robust Local Plan. It is essential to have an adopted plan to ensure the District Council and the Unitary Council that will replace it retains control over where	Comment	The following concerns regarding housing targets and infrastructure deficits are noted. Frinton and Walton Town Council are correct in stating that it is important to have a Local Plan that aligns with national planning policy to avoid speculative development. The Council is working with stakeholders, such as Essex County Council, Anglian and Affinity Water, Network Rail, the ICB/NHS, and other relevant infrastructure providers to ensure that development is supported by the necessary infrastructure to support existing and future communities.

			development occurs, rather than being forced to accept poorly – integrated speculative proposals.		
235	6840	Alresford Parish Council (Mr Matt Cooke, Alresford Parish Council Clerk) [235]	We consider the construction of new Garden Villages to be a preferred option because they provide integrated infrastructure in advance of housing.	Support	Noted.
254	7114	Elmstead Parish Council (Angela Baxter, Clerk) [254]	We consider the parish engagement arrangements set out to be inadequate, as the current consultation does not give parish councils the tools or clarity to influence the plan effectively. We cannot support the Local Plan in its current form. It lacks the necessary commitments to improve existing infrastructure and relies on insufficient mechanisms for extracting developer contributions. Without a radical shift toward a data-driven, cumulative impact approach, these proposals risk leaving our communities with dysfunctional, unviable, and half-finished developments.	Object	Concerns with regard to the consultation process are noted. The intent of this document is to display how representations are considered and how they influence changes to the Local Plan. The Council aims to encourage as much participation as possible from all stakeholders, including Parish Councils, by hosting in person events and giving respondents multiple ways (paper, email, or online) to respond to the Local Plan consultations. The Council will continue to work with Parish Councils and local communities where appropriate. Infrastructure concerns are also understood. The Council has recently updated its Infrastructure Delivery Plan (IDP), a data-based document which will set out the necessary infrastructure required to support growth. In the meantime, the Council will continue to work with the relevant infrastructure providers, such as the NHS/ICB, Anglian Water, and National Highways, to ensure the appropriate infrastructure is delivered to support growth.
258	4276	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We submit our response to the Tendring District Local Plan Review 2025–2042 Preferred Options Consultation, focusing on housing targets, infrastructure, and spatial strategy. While we support a plan-led approach to prevent speculative development, we are concerned about the proposed increase from 550 to 1,063 homes annually, placing significant pressure on communities. Existing infrastructure—roads, healthcare, and schools—cannot support this growth without early investment. We support adopting a robust Local Plan to retain development control. We also support garden village developments, including Tendring Colchester Borders, alongside short-term site allocations. Overall, the plan is positive, but housing targets have generated strong public concern.	Comment	The Council has always acknowledged that the housebuilding requirement for Tendring generated with the Government's standard methodology calculation is over-ambitious, and that this target will be challenging, if not impossible, to achieve. Currently, the Council's provisional approach is to delete certain housing sites within the Reg18 draft of the Local Plan and to adjust assumptions around the deliverability of others (in particular the Garden Villages), which would result in the headroom contingency level falling from 1,500 homes to around 300.
258	4281	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly support policies promoting Garden Communities (SAMU1, SAMU6, SAMU8, SAMU9) and strengthened planning controls in SPL2. We welcome updates to HP1 and strongly support HP5 for sports provision, while raising concern over HP2 regarding surplus healthcare facilities. We support LP4 enhancements to green infrastructure, drainage, and parking, and LP6 clarity on Gypsy and Traveller sites. We back PP6a and PP7 for rural economic growth and mixed-use development, and PP15 for Walton Mere. We strongly support PPL5, PPL6 (with caution), and PPL12c for flood protection and infrastructure. Finally, we support CP2 improvements addressing transport pressures from increased housing.	Comment	Noted.
1110	3786	Lawford Parish Council (Cllr Giancarlo	Lawford Parish Council supports the vision proposed around how the five location groups will develop over the plan life. We do however strongly disagree with the government's policy of forcing such high numbers in an area that has never delivered the quantity required; we think that this drive to deliver 1063 new homes per year will be	Comment	The Council has always acknowledged that the housebuilding requirement for Tendring generated with the Government's standard methodology calculation is over-ambitious, and that this target will be challenging, if not impossible, to achieve. Currently, the Council's

		Guglielmi, County, District, and Parish Councillor) [1110]	reckless, unachievable, and fantasist. Our main concerns are around the delivery of vital infrastructure, particularly in the three proposed Garden Villages of Hare Green/Frating, Horsley Cross, and Weeley. Without the crucial transport, health, and connectivity these areas will not deliver the Vision's principles.		provisional approach is to delete certain housing sites within the Reg18 draft of the Local Plan and to adjust assumptions around the deliverability of others (in particular the Garden Villages), which would result in the headroom contingency level falling from 1,500 homes to around 300. With regard to infrastructure concerns, the Council acknowledges comments made which question whether the Garden Villages, and the crucial transport needed to support them, are realistically deliverable. The Council has updated its transport modelling and the Infrastructure Delivery Plan (IDP), which will both help determine whether the allocations can realistically contribute to the Government-set housing target up to 2042/23. In the interim, the Council will continue to work with infrastructure providers, such as Essex County Council and National Highways, to carry out the necessary data collection and modelling required to inform any final judgement on the deliverability and soundness of the Garden Villages.
799	3806	Frating Parish Council (Cllr Paula Bland) [799]	This representation is on behalf of Frating Parish Council. Our concern is that the proposed Frating development would fundamentally alter and in our view destroy the character of the villages of Frating, Great Bromley, Hare Green, Balls Green, Ravens Green and Little Bentley effectively turning them into a single large, urbanised area.	Object	Whilst the Council acknowledges and understands concerns with regard to SAMU8, village coalescence, and rural character, Garden Villages, including SAMU8, are imperative allocations to maintain within the Local Plan to meet the Government's set housing targets. The Officers have recommended a reduction in the indicative dwelling numbers associated with SAMU8 (Hare Green Garden Village) from 1,700 homes to 1,450 homes within the plan period up to 2043 but maintain the goal of 6,000 homes as a longer-term expectation. This change will give greater flexibility in delivering the development and give time for the local area to adjust to the scale of development. To mitigate village coalescence from SAMU8, the updated Local Plan has maintained Policy PPL6, which protects the Strategic Green Gaps that separate villages from one another. Within Policy SAMU8, there are additional provisions to prevent village coalescence: *"Clear separation will be maintained between the new Garden Village and Elmstead Market through the designation of a Strategic Green Gap to include the provision of a new Country Park"* With regard to concerns of rural character, one of the principles within Policy SAMU8 seeks to achieve appropriate densities and designs in line with local contexts. It is through these policies that the Council is supporting sustainable, context-appropriate development in the Frating area.
953	3459	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The

					suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
270	14560	Little Bentley PC (Dawn Sauka, Clerk) [270]	TDC's current Local Plan underwent years of consultation and remains legally in force until 2033. A change in national housing numbers does not justify discarding the entire plan and replacing it with a hurried, illconceived alternative. The timing of this review-coinciding with the anticipated abolition of TDC as a local authority in April 2028-raises serious concerns about whether this process is being rushed for administrative convenience rather than sound planning reasons.	Object	Concerns with regard to the increase in housing numbers are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
Members of the Public					
630	3454	Fiona Bodmer [630]	Finally some sense! More infrastructure and more new villages is so much more acceptable than the ever increasing housing stock stuck on to existing villages which are full to the rafters.	Support	Noted.
969	3566	Mr Scott Gilmour [969]	Outlining my support of making existing towns better places to live and likewise, attractive for visitors. However I state concerns over the lack of active travel and public transport mentioned within the vision. As for two of the garden villages, I worry that car ownership may be a requirement for many residents due to the lack of a local train station. Perhaps existing towns beside the railway can see more development. A study for the viability of a rail link for Horsley Cross would solve this concern, while also improving the currently poor north-south public transport situation.	Comment	Support for general aspects of the Vision is noted. The suggestion to include greater reference to active travel in the Vision is noted and will be taken forward as appropriate. With regard to transportation for Horsley Cross, the Council is currently updating its transport modelling to reflect where additional links are needed. Any additional transportation will be tested for viability when taken forward.
987	3612	Mrs Erin Stokes [987]	I object to this proposal. While the aims are positive, they are vague and lack clear, enforceable standards. Terms such as “right balance” and “excellent services” are undefined, creating uncertainty and weakening accountability. The policy risks allowing development to proceed without guaranteed infrastructure, firm environmental safeguards, or measurable climate commitments. Mitigation and compensation should not justify avoidable harm to the natural and historic environment. Stronger protections, clearer limits, and binding delivery requirements are needed to ensure growth does not outpace infrastructure or damage local character and biodiversity.	Object	Whilst concerns with regard to the historic environment are understood, it is important to note that the Council must balance the need to protect the environment with meeting national housing targets. The Council reiterates that the increase in housing numbers is set by the Government’s new standard method, rather than the Council itself. Though the Council sees these numbers as over ambitious, it is important the Local Plan is compliant with the Government’s National Planning Policy Framework to ensure the District is not left vulnerable to speculative development. The Local Plan contains policies throughout Chapter 7 which protect biodiversity, rural character, and the historic environment whilst development is underway. The Council is also working with the relevant infrastructure providers and partners to ensure the adequate facilities and services are built alongside housing. The Infrastructure Delivery Plan (IDP) has been updated to reflect the needs of the District and to inform on what facilities are needed where. Whilst concerns over the vague nature of the Vision are noted, specific planning requirements are included in policies throughout the Local Plan.

1032	3655	Ms Jacquie Wilkes [1032]	Support the general principle but practical aspects are not addressed. 1 Tendring Colchester garden community will lead to a loss of identity of the unique towns that exist. Travelling towards Colchester is already a problem. For example a 10 mile commute to work takes one and a half hours. 2 rural heart land . Current services and infrastructure in Brightlingsea already does not meet current demands. More houses put additional pressure of GPs, chemist, schools and services. Leaving brightlingsea in a morning is already a problem since recent housing development. limited consideration to maintain current flood defences, eg Point Clear	Comment	Support for the Vision is noted. The Council acknowledges concerns surrounding transportation and infrastructure, particularly as it relates to the Garden Villages. Transport Modelling and the Infrastructure Delivery Plan have been updated in support of the Regulation 19 version of the Local Plan to inform what types of infrastructure are needed where in the District. In the interim, the Council will continue to work with Essex Highways and the relevant infrastructure providers to ensure developments are supported with adequate infrastructure provisions. Though concerns with regard to local character surrounding the Garden Community are noted, the Garden Communities are pivotal in the Council's ability to meet housing targets set by the Government. The updated Local Plan will therefore retain its larger allocations so that longer-term housing numbers can be realistically achieved. Please see Chapter 7 of the Local Plan for policies which focus on the protection of the historic environment and landscape character of the area whilst such developments take place.
1030	3678	Mr Paul Lewis [1030]	Too much development proposed. No formulated plan for infrastructure improvements. Limited number of jobs created locally Increase in congestion at busy times Local population inevitably priced out of new developments	Comment	Support for the Vision is noted. The Council acknowledges concerns surrounding transportation and infrastructure, particularly as it relates to the Garden Villages. Transport modelling has been updated, and the Infrastructure Delivery Plan will also be updated in support of the Regulation 19 version of the Local Plan. In the interim, the Council will continue to work with Essex Highways and the relevant infrastructure providers to ensure developments are supported with adequate infrastructure provisions. The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan. Please see the affordable housing policies within Chapter 5 and Policy LP5 for more information on how the Local Plan intends to protect the local population from becoming 'priced out' of new developments.
1059	3725	Mr Matthew Sutton [1059]	The Vision statement refers to Walton-on-the-Naze having "improved medical facilities serving the resident population." This is welcome - but the plan as currently drafted contains no specific policy commitment to deliver those improved facilities. A vision statement without a binding delivery mechanism is not sufficient. I ask the Council to ensure that the specific healthcare commitment referenced in the Vision for Walton and Frinton is reflected in an equally specific policy commitment in the body of the plan - with a named funding mechanism, a delivery timescale, and a monitoring indicator in the Authority Monitoring Report.	Object	The Council understands the importance of aligning growth with the appropriate infrastructure. The Council will continue to work with the relevant infrastructure partners, such as the ICB and NHS, to ensure that the adequate facilities are provided alongside development. More specific policies with regard to health care can be found in Chapter 4 of the Local Plan. Please see Table 11.1 within Chapter 11 of the Local Plan for monitoring indicators. Following the provisional deletion of site SAH3 from the Local Plan, reference to health facilities in Walton has been deleted from the Vision.
1066	3744	Mr Gavin Tuff-Lacey [1066]	These plans will create huge disruption for residents without due care on how they will change their locality.	Object	Concerns with regard to local character and loss of agricultural land are understood. The Council reiterates that the increase in housing outlined

					in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
1089	3774	Mrs Hazel Cannons [1089]	I totally object with what is proposed. Tendring is full. No jobs. Not everyone can commute or work from home, people out =more on benefits... No new hospitals etc etc Schools, lacking in places now. Manningtree railway station is too far away, no transport. Congestion on A120 now. Good agricultural land to be used which will Never come back. Food shortage in inevitable. Too many people. Huge amount of properties being built this side of Colchester = big impact on our and surrounding area.	Object	The Council also acknowledges concerns surrounding transportation and infrastructure, particularly as it relates to the Garden Villages. Transport modelling and the Infrastructure Delivery Plan have been updated in support of the Regulation 19 version of the Local Plan. In the interim, the Council will continue to work with Essex Highways and the relevant infrastructure providers to ensure developments are supported with adequate infrastructure provisions. The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan. To mitigate village coalescence from developments, the updated Local Plan has maintained Policy PPL6, which protects Strategic Green Gaps throughout the District that separate villages from one another. This policy will help in protecting the rural character of the District.
1113	3787	Mr Keith Smithard [1113]	I have a number of concerns particularly the proposal on Mears field, behind Branscombe Close. Specifically I am concerned about the impact on the local wildlife. There are rare bats living there which come out at dusk as well as kestrels, pheasants, deer and other British species including hedgehogs and a wide variety of birds - all would be displaced. The road infrastructure, access and layout is also not sufficient for increased traffic. Will also mean more cars drive past the primary school putting children in danger. Local facilities already under strain. Squeezed in with little thought.	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers to support growth. Policy PPL4 has been updated to encourage all new developments to consider the installation of bat boxes, swift and bee bricks, log piles, hibernacula, and hedgehog highways/fencing and housing. More

					generally, the policy sets out broader protections for wildlife in the District. In response to concerns of dangerous walking routes to schools, Policy CP1 encourages planning applications to include proposals for safe, direct, and attracting walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
1148	3860	Mr David Green [1148]	Brightlingsea is effectively an island which is now already over full. Your vision is impossible within the constraints that the geography dictates unless your vision accepts a lowering of quality of life for the current residents.	Object	Officers have provisionally suggested that development in Brightlingsea (SAH4) be removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, it is suggested that two smaller sites are included within the urban area of Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment.
1107	3875	Mr Philippe Whyte [1107]	The vision does not appear to take into account the damage to the natural environment, the increase of road traffic and the added pressure on already meagre resources. It is stated that it is to deal with "a growing population", this is something I have not seen in Frinton and Walton, houses remain empty for years and there does not seem to be a demand for houses around here? However I believe that this is a National Government led scheme, so I guess that this is to house people not from the area? I am opposed to building on fields.	Object	The Council acknowledges concerns about building on fields and agricultural land. However, due to the rural character of the District and high national housing targets to meet, it is inevitable that most development must take place on greenfield land. The amount of housing and what types of housing are built are determined by the Strategic Housing Market Assessment. With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1211	3877	Mrs Helen Paxman [1211]	Extra congestion on the main road at peak times, queuing is already an issue. The infrastructure cannot cope, Doctors surgery, chemist and schools are all already under pressure.	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
616	3881	Mr Kevin Everitt [616]	The current plan is more than adequate for the needs of Tendrin., This new plan is an over development on a scale that will be impossible to meet and will change the nature	Object	Concerns with regard to local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council

			of a rural and coastal community forever, purely to meet numbers provided by central government who have no idea of the needs of the community.		views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
616	3934	Mr Kevin Everitt [616]	Although I support the overall strategy, the scale of development for the area far exceeds the local need and cannot be justified, the current local plan was adequate for the foreseeable future.	Comment	Concerns with regard to local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
1350	4004	Prof Mark Lowdell [1350]	Tendring lacks critical infrastructure re roads and rail to sustain this dramatic increase in residents.	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council is also working to update its transport modelling, which will provide insights as to where additional transport infrastructure is required in the District. In the meantime, the Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1352	4022	Mrs Paula Bland [1352]	The proposed local plan will result in the Colchester, Elmstead Market, Frating, Gt Bromley, Ravens Green, Little Bentley becoming one large urban sprawl with heavily congested roads and inadequate infrastructure.	Comment	Concerns with regard to local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1376	4207	Mrs Anja Newman [1376]	In principle, the vision sounds lovely. Concerning are the garden villages that do not have bus routes or train stations, requiring even more traffic to use the already crowded, dangerous, potholed roads. Water is already a precious commodity in Tendring, and the sewage treatment works already can't cope with the existing housing, allowing sewage/pollution to flow into the sea and other waterways with alarming frequency.	Comment	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so. The Council is also updating its Strategic Flood Risk Assessment alongside a Water Cycle Study, which will provide up-to-date data on sewage treatment and flooding.

					In response to concerns of transportation in Garden Villages, it is acknowledged that the larger allocations are not near to public transportation hubs, such as a railway. However, Tendring Colchester Borders Garden Community will have a Rapid Transit System, and improvements to public transportation will be made in support of the Hare Green and Horsley Cross Garden Villages.
1382	4223	Ms Tamasin Davies [1382]	High unemployment, run down town centres with few decent shops (eg Clacton, Harwich, Jaywick), poor health, poor rented sector, low educational achievement, schools with a poor academic record (eg Harwich). Those living in the more affluent parts of Tendring often do not realise they live in Tendring and never visit these parts in such dire need of investment -I can only see targets for house building with no funded plan to create opportunities for the poor of Tendring. Those moving into the housing estates will be owner occupiers commuting to Colchester, Ipswich, Chelmsford or London not Clacton or Harwich	Comment	Concerns with regard to housing numbers are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Local Plan has several policies which seek to improve economic outputs throughout the District. Chapter 6, Prosperous Places, outlines policies which focus on town centres, employment sites, and retail spaces.
1401	4334	Mr Andrew Bacon [1401]	The Vision appears to be logical and appropriate to preserve and enhance the special and unique character of Tendring District and recognising that future growth has to accommodated and planned in a rational manner.	Support	Noted.
1424	4396	Mrs JOAN BIRCHLEY [1424]	Too many houses for such a small community, in an unsuitable location with narrow road access. Doctors and School could not cope. Village needs to keep it's separate identity without expanding to join nearby villages.	Object	Concerns with regard to local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. To mitigate village coalescence from developments, the updated Local Plan has maintained Policy PPL6, which protects Strategic Green Gaps throughout the District that separate villages from one another. This policy will help protect the rural character of the District. With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
782	4436	Shelley Bellett [782]	As above , development should be in smaller towns ie Clacton / Harwich / Colchester where where infrastructure/ amenities are already in place not in rural villages where people would have to use their cars to get anywhere.	Object	Though Officers accept that housing developments in smaller rural villages are generally less sustainable than sites allocated within or around towns and villages, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. This approach also contributes to the Council meeting the expectation that at least 10% of the housing requirements should be accommodated on sites of one hectare or less, as set out in national planning policy.

					Whilst these concerns are noted, the Local Plan includes wording which supports active travel and connected places. Policy CP1 of the Local Plan outlines that all applications for major developments should include proposals for "safe, direct and attractive walking and cycling routes that link to existing networks". Similarly, the Settlement Hierarchy set out in Policy SPL1 prioritises locations with existing access to public transport and amenities and identifies locations where new settlements can also be developed at a scale where growth can be supported by infrastructure and employment opportunities.
571	4470	Mrs Sian Savage [571]	The Neighbourhood Plan for Brightlingsea would only support new development within the settlement boundary that meets the needs that have been identified in the Housing Needs Assessment and via community consultation. These are, affordable homes, housing for an ageing population and sustainable eco-friendly housing. Residents of the town are concerned about the impact that additional housing will have on infrastructure (incl. one already over-used access road and a lack of safe cycle routes), on facilities and services in general incl. an already over-stretched GP Surgery and Pharmacy, and on the local environment, wildlife and views.	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so. Officers have provisionally suggested that development in Brightlingsea (SAH4), be removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, it is suggested that two smaller sites are included within the urban area of Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment.
822	4501	Rachel Fletcher [822]	This process is difficult to engage with and complex. The scale of the proposals- in relation to the garden villages in particular is enormous. There is insufficient detail on and commitment to public engagement at all stages of the development- including efforts to inform and listen to residents and ensuring democratic accountability (not only 'stewardship' which is a different thing).	Comment	The Council acknowledges that the consultation process can be complex to engage with. Whilst it is understood that the Local Plan is a large document with many proposals, the Council must comply with National Planning Guidance to ensure the District is not vulnerable to speculative development. The Council therefore seeks to write policies which balance the technical aspect of policy with more comprehensible wordings. That being said, any queries with regard to policies can be directed to the planning policy team at planning.policy@tendringdc.gov.uk. The Council greatly values public engagement with the Local Plan. During the Preferred Options consultation, there were several methods respondents could use to respond to the Local Plan, including online, paper, and email options. Multiple in-person events were also held, so that members of the public could have discussions with Officers regarding the policies.

1245	13773	Mr DJ Tuson [1245]	The area cannot cope with any more traffic. The roads are not built for it, these are villages with nowhere for road expansion. Furthermore fields should be used for growing food and NOT houses. Unfortunately the infrastructure is never the top of the list but it must be planned and developed before any further development is considered. This part of the country is being used as a dumping ground with little consideration for the future generations and their quality of life. I am very concerned about this process.	Comment	Concerns with regard to local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
1510	13816	Julie and Trevor Cottee [1510]	Objection to the vision set out in the plan, as it is not supported by evidence or recent experience. Claims of delivering high-quality homes, enhanced wildlife networks, improved healthcare, reduced congestion and better quality of life are contradicted by recent developments, which have delivered dense, poorly designed housing with little green space and no meaningful wildlife benefit. Local GP and dental services are already overstretched, with no improvements delivered despite previous growth. Traffic congestion has worsened, not improved, and unemployment remains high with no new local jobs created. The proposals fail to meet the needs or aspirations of existing residents and do not demonstrate that people or place are genuinely being put first.	Object	The Council has commissioned work suggested by statutory consultees and other partners, and much of this work is completed. This work includes updates to the Heritage Impact Assessment, The Strategic Flood Risk Assessment, transport modelling, and the Infrastructure Delivery Plan. Having up-to-date evidence will better inform final decisions made with regard to allocations and help in supporting developments with the appropriate infrastructure. The Council will also continue to work with the relevant infrastructure providers, such as the NHS/ICB and National Highways, to ensure that the adequate facilities and services are planned for alongside development. The Council has included policies in the Local Plan which address concerns relating to unemployment. Please see Chapter 6 for more information.
573	13911	Nick Colling [573]	Please take this as my objection to these proposals.	Object	Noted.
1631	13977	mary mills [1631]	My objections are Not enough infrastructure ROADS NOT SUITABLE FOR MORE HOUSING. POSSIBLE DANGERS	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1201	14079	Barbara Garcia [1201]	Too many houses. The doctors dentist school chemist cannot cope. Not enough parking. No policing. Transport badly disrupted. Vision - cannot see much future for town. No entertainment, no proper transport.	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers to support growth.
1495	14185	Martine Ward [1495]	Residents across Tendring have been subjected to a continuous cycle of consultations, each involving lengthy, technical documents that are difficult for ordinary people to navigate. These consultations often overlap, arrive with short deadlines, and require residents to interpret complex planning, infrastructure, and environmental information without	Comment	The Council acknowledges that the consultation process can be complex to engage with. Whilst it is understood that the Local Plan is a large document with many proposals, the Council must comply with National Planning Guidance to ensure the District is not vulnerable to speculative development. The Council therefore seeks to write policies which balance the technical aspect of policy with more comprehensible

			support. This has created widespread consultation fatigue and a growing sense of frustration and exhaustion within the community. The burden placed on residents is disproportionate. Volunteers, community groups, and parish councils are expected to respond to multiple major consultations simultaneously — including national infrastructure proposals, housing allocations, commercial developments, mineral extraction plans, and now the Neighbourhood Plan Review. Many of these documents run to hundreds of pages, with key information buried deep within technical appendices, making meaningful engagement extremely challenging. Small parishes cannot afford legal representation, leaving them at a structural disadvantage — a clay pot against a metal pot. The imbalance is clear, and it is not fair. The Neighbourhood Plan must acknowledge the cumulative burden created by this consultation overload. Future engagement must be accessible, transparent, and realistic, ensuring that residents are given the time, information, and support needed to participate effectively. A sustainable planning process cannot rely on exhausting the very communities it is meant to serve.		wordings. That being said, any queries with regard to policies can be directed to the planning policy team at planning.policy@tendringdc.gov.uk. The Council greatly values public engagement with the Local Plan. During the Preferred Options consultation, there were several methods respondents could use to respond to the Local Plan, including online, paper, and email options. Multiple in-person events were also held, so that members of the public could have discussions with Officers regarding the policies.
1498	14192	Lee Smith [1498]	TDC's current Local Plan underwent years of consultation and remains legally in force until 2033. A change in national housing numbers does not justify discarding the entire plan and replacing it with a hurried, ill-conceived alternative. The timing of this review-coinciding with the anticipated abolition of TDC as a local authority in April 2028-raises serious concerns about whether this process is being rushed for administrative convenience rather than sound planning reasons.	Object	Concerns with regard to the increase in housing numbers are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
1281	14193	Mr Michael Norsworthy [1281]	This village is overpopulated already. It has no bans, one chemist (Boots) rather small. When I moved here 12 years ago, I only waited two days for a prescription to go through. Now it is a week. Doctors could be bigger or a second one. A town dentist is needed. Most of the shops are either charity shops or hairdressers.	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1678	14220	Philip Chapman [1678]	The vision is short sighted by not taking into account infrastructure	Comment	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1197	14378	Neil Carlyle [1197]	Local infrastructure won't cope!	Comment	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as

					National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.

Vision

Summary of Representations

The Vision has received broad support for its intentions to bring about housing and economic opportunities. Some minor suggestions were proposed by technical stakeholders and developers which will provide greater clarity to the wording of the Local Plan as well as add greater detail to the main text, and some greater concerns were raised regarding general weaknesses throughout the Local Plan. Essex Wildlife Trust highlighted the lack of reference to the Essex Local Nature Recovery Strategy (LNRS), and suggested the document be integrated further into the Local Plan. This was complemented by a suggestion to commission a Green Infrastructure and Nature Recovery Strategy as a Supplementary Planning Document to support the Local Plan. Others noted a concern with the overall housing number set by the National Government, and how the increase in housebuilding may affect local character, infrastructure and the natural environment. An objection was given on the basis that there was no reference to 'aging in place' within the Vision; several developers also encourage regeneration schemes to support this concept. Developers also pointed out the need to reference housing for residents of an older age, as well as residents with special accommodation needs within the Vision. Parish Councils and members of the Public stated that there was a greater need for reforms to the consultation and community engagement process.

In response, the Council has chosen to take some of these suggestions forward in the updated plan. The Vision has been updated to include reference to active travel within the second paragraph. Reference to healthy and physically active communities has been added at the end of the Vision. Some of the wording changes suggested by Latimer have been taken forward, where appropriate. However, it is important to note that the more specific wordings suggested will be included in the policy phrasing as well as the planning application process itself. Therefore, it is not seen as necessary to include all wording suggestions in the updated Local Plan. The Vision has also been updated to include specific reference to the National Landscapes, and a 'tidy' coast has been changed to a 'dynamic' coast.

Objective 1: Housing Delivery

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
1335	4363	Affinity Water Ltd [1335]	The proposed developments by Affinity at Clacton (Site Ref. MSA30) and at Manningtree (Site Ref. MSA3) would contribute towards the housing delivery objective for emerging TDLPR. No changes are required to the housing delivery objective.	Support	Noted.
358	13580	Historic England (Andrew Marsh, Historic Environment Planning Adviser) [358]	We would kindly remind the Council that it remains responsible for ensuring that all sites proposed for allocation are sufficiently understood and justified in terms of their potential impacts on the historic environment.	Comment	This comment is noted and has been taken into account in the Reg18 version of the Local Plan. The Vision outlines that any new development must "Balance the development needs of the District with the protection and enhancement of the natural, historic, and built environment", as well as through Objective 7. The Council will continue to work with Historic England where appropriate.
148	14458	Environment Agency (Environment Agency) [148]	We agree with the vision statement for the Tendring District and Objectives 1,2 and 3.	Comment	Noted.
Businesses, Landowners and Developers					
1215	3903	Pigeon [1215]	The majority of the Housing Delivery objective is supported. However, in relation to delivering high quality sustainable communities, the wording of the objective should be revised to acknowledge that sustainable communities are more likely to be achieved during the Plan period through new development adjoining existing sustainable settlements, rather than new standalone communities, such as Garden Villages.	Comment	The Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. The rational for this approach is set out in Chapter 3, Sustainable Places, of the Local Plan.
1336	4309	Pigeon [1336]	The proposed development by Pigeon at land off Cockaynes Lane in Alresford would contribute towards the housing delivery objective for emerging TDLPR. No changes are required to the housing delivery objective.	Support	Noted.
136	4335	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	This is a logical and effective objective	Support	Noted.
1638	4409	Lichfields (Amy Jones, Planner) [1638]	Our client agrees with the clear focus on the delivery of new housing to meet need in full, from the outset of the Plan, and considers that this is an important challenge that must be acknowledged and addressed throughout the Plan. The draft allocation for residential development at land north of Thorpe Road would help to realise the Council's vision.	Support	Noted.
1439	13867	Catesby Estates [1439]	Catesby continue to support the Vision for the Future of Tendring. However, as set out in our previous representations, Catesby contends that Objective 1 should be reworded to: "Objective 1: Housing Delivery: To provide new dwellings within Tendring District up to 2041 of sufficient variety in terms of location of sites, size, types, tenure and affordability to meet the needs of a growing and ageing population in full. To deliver high quality sustainable new communities. [and extensions to existing communities]."	Comment	The proposed changes to the wording are noted and will be taken forward in the updated Local Plan.

			(See document for revised wording)		
795	14296	Boxford Suffolk (Farms) Ltd [795]	Central to this objective is to provide sufficient variety in location, size, type, tenure, and affordability of sites. We do not believe that sufficient variety within a rural community can be achieved with the allocation of predominantly large Garden Villages or Garden Communities. The inclusion of smaller sites in other locations will provide a much-needed variety in location. Conversely, allocation of Sites 202, 3261 and 3262 would provide genuine variety of all of the above, which considering the size of Ardleigh as a settlement and Harwich Road as a housing/employment group, would be justifiably "sufficient". it is clear that these sites would, if all were to be allocated, complement each other as they would contribute more meaningfully towards the strategic objectives.	Comment	Whilst this comment and concern are noted, sustainable development will be achieved through both smaller and larger allocations. The housing target set by the Government necessitates the allocation of Garden Villages, which can meet the longer-term growth targets of the District, whilst the smaller allocations will be able to meet short-term targets. Smaller housing allocations have been chosen with reflection of existing infrastructure provision, employment opportunities, and environmental constraints, with the goal of achieving sustainable housing growth across the District. More information can be found in Chapter 3, Sustainable Places, of the Local Plan.
Community Representatives					
1110	3814	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We support the strategic objectives	Support	Noted.
953	3460	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
Members of the Public					
969	3567	Mr Scott Gilmour [969]	Great objectives to pursue. To prevent unnecessary car journeys, they should hopefully be close to amenities and to bus stops, with safe routes to walk, wheel and cycle to destinations.	Support	Support for this objective is noted. The Council agrees that housing should be close to amenities and active travel routes. Policy CP1 of the Local Plan outlines that all applications for major developments should include proposals for "safe, direct and attractive walking and cycling routes that link to existing networks". In addition to Policy CP1, the Settlement Hierarchy set out in Policy SPL1 prioritises locations with existing access to public transport and amenities and identifies locations where new settlements can also be developed at a scale where growth can be supported by infrastructure and employment opportunities.
580	3568	Mrs Caroline Mitchell [580]	I would like to understand what " other forms of specialist accommodation " means.	Comment	'Specialist and Supported Housing' has been added to the glossary of terms.
981	3607	Ms Danielle Williams [981]	The District has an ageing population and Wrabness reflects this trend. If housing is to be allocated here, it should prioritise smaller 1–2 bedroom bungalows and accessible	Object	Concerns regarding housing choice are noted. As set out in Strategic Policy LP2, the Council will continue to work alongside the

			dwellings designed for downsizing older residents who wish to remain within their community. This would help free up larger family homes elsewhere while maintaining social cohesion. Larger executive or high-density family housing would increase school travel and commuting in a location with limited services. Any allocation at Wrabness should therefore be specifically conditioned to meet local ageing population needs rather than general market demand.		development industry and housing providers to develop a mix of housing types across the District. The types of housing developed are informed by the Strategic Housing market Assessment (SHMA), which outlines housing need through evidence-based methodologies. Policy LP2 also states the Council will support the development of bungalows, retirement complexes, extra care housing, independent living, and other forms of residential accommodation which will meet the needs of older residents.
987	3613	Mrs Erin Stokes [987]	I object to this proposal. While meeting housing needs is important, the scale and open-ended commitment to provide dwellings “in full” up to 2042 risks overdevelopment without clear infrastructure guarantees. There is insufficient detail on how impacts on roads, healthcare, schools, and the environment will be addressed. The emphasis on growth lacks firm safeguards to protect local character and countryside. “High quality” and “sustainable” are not clearly defined or measurable. Development should be proportionate, infrastructure-led, and demonstrably aligned with environmental capacity and community needs.	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so. Whilst the Council understands concerns over the housing targets set out in the Local Plan, it is important to note that these figures are set by the National Government, rather than the Council itself. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not left vulnerable to speculative development. Proportionate growth is supported by the Council and reflected through Policy SPL1, which sets out the Settlement Hierarchy for development. This hierarchy directs development proportional to the infrastructure, environment, and economic opportunities within the settlement development boundaries, ensuring that growth is appropriate for the local area.
1030	3694	Mr Paul Lewis [1030]	Development proposed is too much outside of the new garden villages and Colchester borders development. Existing communities should not have their already stretched resources and infrastructure strained even further.	Object	Concerns with regard to the increase in housing numbers are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The housing target set by the Government necessitates the allocation of Garden Villages, which can meet the longer-term growth targets of the District, whilst the smaller allocations will be able to meet short-term targets. The Council has updated its Infrastructure Delivery Plan (IDP), which will inform on where development needs to be placed in support of

					development. In the interim, the Council will continue to work with the relevant infrastructure providers to secure the adequate provisions of facilities and services.
1066	3745	Mr Gavin Tuff-Lacey [1066]	New communities must respect the locality of existing settlements and should not change the DNA of those existing settlements.	Comment	Concerns with regard to the increase in housing numbers and local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. Please see Chapter 7 of the Local Plan for policies which protect the rural landscape and historic environment of the District.
1064	3761	Mrs Elizabeth Sadler [1064]	We do NOT need any more houses in this area as they are not being bought up ;there are many around my house that have been on the market for many months/years. Samphire Meadow new building site has HUGE problems selling the houses :at one time stopping building. They offer incentives such as paying moving expenses/paying stamp duty /helping with mortgages ,and they are still NOT selling. Do you intend to sell these houses to London boroughs for overspill ??? That would be underhanded and unacceptable.	Comment	Concerns with regard to the increase in housing numbers are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The types of housing developed are informed by the Strategic Housing Market Assessment (SHMA), which outlines housing need through evidence-based methodologies.
752	3794	Mr Christopher Walpole [752]	I do not believe that the three chosen sites for further huge development are viable as this increase in population pressures within a very confined area of proposed development is really not sustainable in terms of road provision , education facilities , hospital facilities , employment opportunities , this being on top of the huge Colchester / Tendring plans already in place , as the fastest growing city in the UK we have already gone beyond reasonable saturation levels with overly congested roads with the key route the A12 likely the most congested in the UK .	Object	Concerns with regard to the increase in housing numbers and local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1107	3876	Mr Philippe Whyte [1107]	As I have already stated that in the area I live and work - Frinton and Walton there is no demand for housing. It takes ages to sell a house and many remain empty for years, there are also some derelict properties. Do not build on our green and pleasant land	Object	Concerns with regard to the increase in housing numbers and local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.

					The Council acknowledges concerns about building on open space and agricultural land. However, due to the rural character of the district and high national housing targets, it is inevitable that most development must take place on greenfield land.
616	3885	Mr Kevin Everitt [616]	The current plan has thousands of additional homes yet to be built and there are many new unsold new and old homes in the area that have been on the market for sometime questioning the need for additional new homes, lots of the new homes only attract people from outside the area rather than from Tendring.	Object	Concerns with regard to the increase in housing numbers and local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The types of housing proposed locally are informed by the Strategic Housing Market Assessment (SHMA), which outlines housing need through evidence-based methodologies.
1270	3922	Mr Matt Parkin [1270]	I support and understand the need for additional housing in the county, as long as the chosen locations are given due consideration to the extent of work needed in the area to be able to provide these types of upcoming communities	Support	Noted.
1352	4040	Mrs Paula Bland [1352]	It will be possible to achieve the Council's aim only if sufficient infrastructure is provided before and during the building of the new homes. The district of Tendring is already woefully served by an inadequate road network that is congested at peak times in the day and during the summer season and while the highway 'experts' may say we have the capacity to take more vehicles they clearly do not lively in the borough or use our roads. We have no main hospital, few GPs, NHS dentists, a minimal number of schools and poor public transport.	Comment	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
581	4052	Mrs Sally Webb [581]	There has been no proven consultation by Government that Tendring requires the new housing being imposed on it by quota. there are no new jobs being created for the amount of residents who are planned to move in to an already crowded area.	Comment	Concerns with regard to the increase in housing numbers and local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan.
1373	4201	Mrs cindy BROWNE [1373]	Great Oakley There is already planning permission for 82 houses that have not yet been built on the Allotment Field site these homes have provision for 2 cars in most homes. This would increase the through traffic through the village an additional 100 extra homes would impact on the character of the area. Also Impact on the bat population and wild life due to light pollution.	Comment	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.

			Danger to children who access the local school due to increase in traffic on bends.		Policy PPL4 has been updated to encourage all new developments to consider the installation of bat boxes, swift and bee bricks, log piles, hibernacula, and hedgehog highways/fencing and housing. Additional policies discourage light pollution. For instance, Policy CP2 has been updated to assess lorry parks against a variety of criteria, light pollution being one of many. Similarly, Policy PP6a states that proposals for the extension of existing employment sites located outside defined settlement boundaries will be supported when a variety of criteria are met, and this includes compliance with dark skies principles. Policy PPL3 also sets out that new development within the rural landscape should minimise the impact of light pollution on the site and its surroundings. In response to concerns of dangerous walking routes to schools, Policy CP1 encourages planning applications to include proposals for safe, direct, and attracting walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
1376	4208	Mrs Anja Newman [1376]	We need cheaper affordable housing for our local young and less well-off people. Building big houses excludes this vulnerable but important group. Building big houses only encourages people from London/South Essex to upsize into the area, which does not solve the local housing need. It just fills up the already over-crowded roads with their many big cars. We need a balance.	Comment	Concerns with regard to affordable housing are noted. Objective 1 sets out the need for the sufficient variety of housing, with regard to affordability and other variables. The appropriate variety of housing affordability and type is set out in the latest Strategic Housing Market Assessment (SHMA), which uses evidence-based methodologies to inform its outputs.
1382	4228	Ms Tamasin Davies [1382]	Tendring has government targets - meeting them is what matters. I cant see evidence of an evaluation of housing needs [redacted] in Wrabness or a plan suitable to meet those needs. There is a considerable number of single older people living in 3 bed - houses - were they consulted about downsizing to a new build? Housing developments have included 'so called' affordable houses - very slow to sell - too expensive for the target group of 25-40s paying extortionate rents in the the insecure private rented sector (at risk of S21 evictions)	Comment	The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan. With regard to housing for older residents, Policy LP2 states the Council will support the development of bungalows, retirement complexes, extra care housing, independent living, and other forms of residential accommodation which will meet the needs of older residents. The types of housing developed are informed by the Strategic Housing Market Assessment (SHMA), which outlines housing need through evidence-based methodologies.
1391	4253	Mrs Laurence Dewey [1391]	Although I am aware some new housing is needed, I can't accept that our small communities should get absorbed into a major development comprising 4000 new homes, defacing the nature of our rural area. It is fundamentally out of scale with the surrounding area. Moreover, the proposed plan	Comment	Concerns with regard to the increase in housing numbers and local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national

			does not explain how this scheme will benefit Clacton on Sea for instance "making it a vibrant town everyone will want to live in". There is no obvious correlation between a scheme of this magnitude and the sudden reversal of fortune and regeneration of a costal town.		planning guidance so that the District is not vulnerable to speculative development.
822	4503	Rachel Fletcher [822]	Garden villages on this scale need to be treated differently from the more modest developments proposed with early and demonstratable commitment to engagement of affected communities. Very disappointed that there were no public engagement events or attempts to communicate directly with residents in Balls green, Frating Green or Hare Green and nothing in Frating or Great Bromley. This must change if the proposals go forward.	Comment	The Council understands the Garden Community and Garden Villages may have substantial impacts on the local community. The Tendring Colchester Borders Garden Community Draft Plan has been through its own consultation process from 14 March – 25 April 2022 as part of the statutory plan making process under the Town and Country Planning (Local Planning) Regulation 2012. Please find more information about this consultation here. In addition to this consultation process, the Garden Community has its own Development Plan Document, which contains policies setting out how the new community will be designed, developed, and delivered. The Hare Green and Horsley Cross Garden Villages will be subject to their own DPDs containing individual policies with regard to the location of each development. More generally, however, individuals are able to make comments on planning applications through the Council's Planning Public Access website. More information can be found here. Concerns with regard to the consultation process are noted. The intent of this document is to display how representations are considered and how they influence changes to the Local Plan. The Council aims to encourage as much participation as possible from all stakeholders by hosting in person events and giving respondents multiple ways (paper, email, or online) to respond to the Local Plan consultations. The Council will continue to engage with the public where appropriate.
1510	13817	Julie and Trevor Cottee [1510]	Housing objectives. How will a big developer provide specialist accommodation within this potential development for the needs of the disabled and the aging population. Recent builds have all been houses with no bungalows or purpose-built disabled accommodation. A very nominal effort has been made.	Comment	The Council supports and understands the need for specialist accommodation in the District with regard to the aging population. Policy LP3 states that, *"on housing developments of 10 or more dwellings, 10% of market housing should be to Building Regulations Part M4(2) 'adaptable and accessible' standard. For affordable homes, 95% Should be to Building Regulations Part M4(2) and 5% should be to Party M4(3) 'wheelchair-user' standards"* With regard to specialist housing, Policy LP10 states the Council will support the construction of high-quality care homes, extra-care housing and other forms of specialist accommodation. The Council's Strategic Housing Market Assessment uses evidence-based methodologies to inform on what types of housing are needed and where they are needed throughout the District. This includes assessments on the size of homes, housing tenure, and housing

					affordability. Please see the document linked above for more information.
1254	13863	Janet Fryatt [1254]	TOO MANY HOUSES ON OUR FARMLAND'S. TOO MANY CARS ETC! TO COPE WITH ON OUR ROADS, OVERCROWDING IN OUR AREA'S, NO DRAINAGE AND DANGER OF FLOODING. JUST BUILD US SOME, DOCTORS & DENTISTS. (HIGH PRIORITY)	Object	The Council acknowledges concerns about building on open and agricultural land. However, due to the rural character of the district and high national housing targets, it is inevitable that most development must take place on greenfield land. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure. There are also policies in place, such as Policy PPL1, which give guidance on how development proposals should provide the appropriate measures to respond to flood risk. The Council will continue to work with the Environment Agency and the relevant partners to mitigate flood risk, alongside these policies within the Local Plan. With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1259	14125	Robert and Susan Newton [1259]	There also seem to be a lot of houses being built in this area already, including a proposed estate for 400-600 new houses at Kirby-le-Soken. Is there really a need for them all, with no thought given to whether they will actually sell or who will live in them. More thought should be given to improving the existing roads and building more schools and GP surgeries before squeezing in many more houses.	Comment	Concerns with regard to local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1698	14147	Sharon Still [1698]	My comments relate to concerns about the impact of development on health, environment and local infrastructure. There is concern that construction will create dust and disturb pests, which could worsen existing respiratory conditions such as asthma. The site is also important for wildlife, including marsh harriers and other species, which would be	Object	The Council acknowledges concerns with regard to the environment and agrees that protections must be in place to ensure new development is sustainable.

			adversely affected. In addition, there are concerns about increased traffic and the lack of capacity in local doctors and schools to support further development. (CANNOT IDENTIFY SITE, SEE ATTACHMENT FOR MORE DETAIL)		Policy SPL3 outlines criteria that must be met by all new development and states that, *"during the construction phase, developers must comply with a 'considerate constructors' scheme' which employs reasonable measures and techniques to minimise and mitigate impacts and disturbance to neighbours and the existing wider community and any damage to public and private property."* In addition to the 'considerate constructors' scheme, SPL3 also requires that developments must not have unacceptable levels of pollution. With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1179	14151	Mrs Pamela Everson [1179]	Object - there has been huge growth in our area in recent years. This must be considered before any new planning approved. Infrastructure and wildlife concerns raised in detail in rep.	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so. Concerns with regard to local character and wildlife are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
1503	14325	Mr Carl Richardson [1503]	This objective, which emphasises the need to provide sufficient new homes in the period to 2042 in a variety of locations, sizes, types and tenures in order to meet the demands of a growing and ageing population, and to meet these needs in full, as required by the National Planning Policy Framework (NPPF, 2024), is supported as being positive and consistent with national policy.	Support	Noted.

Objective 1: Housing Delivery

Summary of Representations

General support for the objective was given from technical stakeholders, community representatives, and developers. Historic England reminds the Council that proposed sites must be justified in terms of their impact on the local environment. Developers suggested some minor changes to the objective, including a suggestion to add a note which clarifies sustainable development is more achievable through smaller sites adjoining existing settlements rather than standalone communities. Small wording suggestions were also made. Members of the public had greater concerns to the objective, stating a greater need for accommodations for older residents and a request for the Council to define “high quality”, “sustainable”, and “specialist accommodation.” Further representations voiced concerns for the local character of the District, the natural environment, and infrastructure capacity.

In response, the Council has updated the wording of the final sentence of Objective 1 to expand upon the idea of sustainable new communities to include extensions to existing communities. Although the Council acknowledges that development adjoining existing sustainable settlements can be more sustainable than the standalone communities, brand new communities planned in accordance with garden city principles and the appropriate infrastructure can be this concept is expanded upon in Chapter 3, paragraphs 3.40 to 3.66 and therefore does not need to be reiterated within the Objective. The Council has, however, included wording which supports development near to amenities, public transportation, and every-day facilities. The Council has also included a definition of ‘specialist accommodation’ in the glossary of the Local Plan.

Objective 2: Employment/Commercial

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
148	14459	Environment Agency (Environment Agency) [148]	We agree with the vision statement for the Tendring District and Objectives 1,2 and 3.	Comment	Noted.
Businesses, Landowners and Developers					
136	4336	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	Ditto	Support	Noted.
Community Representatives					
1110	3815	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We support the strategic objectives for Employment	Support	Noted.
258	4280	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	Objective 2 Employment/Commercial Strongly support	Support	Noted.
258	13597	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	Strongly Support	Support	Noted.
953	3461	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
Members of the Public					
597	3452	Miss Stacy Willis [597]	The economics poor in the Tendring area and they are diminishing and opportunities are lower than ever, we have no college at the Colne Community school anymore and less	Object	The Council acknowledges that there is social-economic deprivation within the District. Several policies in Chapter 6 of the Local Plan seek

			shops and business to take people on. Business rates are to high and so is Tax, which then promotes people to get into social housing and benefits, more houses are going to bring more crime kill wildlife and their home, it doesn't seem the the council cares about this at all. We need less people and less building full stop.		to address issues relating to shop closures, declining footfall, and unemployment. Additions to Chapter 6 of the updated Local Plan include Policy PP6a, which supports sustainable economic growth through extensions to existing employment sites in the countryside. Similarly, Policy PP7 has been updated to support additional allocations for employment sites. These employment sites will encourage job creation and support the local economy. The Council understands concerns with regard to new house building locally. However, the Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. Policies are in place to ensure these new developments are supported by the adequate infrastructure (see Chapters 9 and 10). In addition to this, Policies, such as Policies PPL3 and PPL4, have been retained in the Local Plan to protect the rural landscape and biodiversity within Tendring.
969	3571	Mr Scott Gilmour [969]	Ensuring a range of economic sectors are represented would enable residents of all abilities and skills to have ample opportunities. It is essential that these opportunities are close to homes and transit stops/active travel infrastructure so residents have the freedom to reach work with a plethora of options.	Support	Noted. These points are reflected in Objective 2 of the updated Local Plan.
981	3608	Ms Danielle Williams [981]	Development should be located where people can meet daily needs locally or minimise travel. Wrabness has no employment centre, limited services and minimal public transport frequency. Additional housing will increase commuting, school travel and service trips by car. In contrast, the Garden Villages are designed to integrate housing, jobs and infrastructure. Allocating housing in a village without employment opportunities undermines the Plan's sustainability objective and promotes car-dependent patterns of growth.	Object	Though Officers accept that housing developments in smaller rural villages are generally less sustainable than sites allocated within or around towns and villages, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. This approach also contributes to the Council meeting the expectation that at least 10% of the housing requirements should be accommodated on sites of one hectare or less, as set out in national planning policy.
987	3614	Mrs Erin Stokes [987]	I object to this proposal. While supporting employment is important, it promotes broad economic growth without clear limits or safeguards for infrastructure, landscape, and residential amenity. The allocation of additional employment land risks loss of countryside and increased traffic, particularly if sites are poorly located. Claims that this will reduce travel are unproven and lack firm transport commitments. There is insufficient evidence that projected growth sectors justify long-term land release to 2042. Economic development should be proportionate, evidence-based, and aligned with environmental capacity and community wellbeing.	Object	Whilst concerns with regard to infrastructure are noted, the Infrastructure Delivery Plan (IDP) sets out where infrastructure is needed and how it should be delivered. The Council has recently updated its IDP in support of the Regulation 19 version of the Local Plan. This will take into account additional housing allocations and employment sites within the Regulation 18 version of the Local Plan, ensuring that new houses are supported by the adequate infrastructure and facilities. Concerns with regard to the increase in housing numbers and local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government

					Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
988	3619	Mrs Carla Leonard-Wrigjt [988]	Beaumont - creating 20 houses in a rural isolated area will not minimise the need to travel unless all residents work from home, children are home educated & external services such as supermarket deliveries & health care services do house calls, this will increase traffic putting further strain on minimal local services, isolating people especially the vulnerable. This does not create growth this creates issues for new comers & established residence, people choose to live in a village based on their families heritage, lifestyle choice, financial status, mobility, healthcare needs. People choose villages to escape the sprawl of new houses	Object	Though the Council accepts that housing developments in smaller rural villages, such as Beaumont, are generally less sustainable than sites allocated within or around towns and villages, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. This approach also contributes to the Council meeting the expectation that at least 10% of the housing requirements should be accommodated on sites of one hectare or less, as set out in national planning policy. As Beaumont is designated as a Smaller Rural Settlement within the Local Plan, it is understood that the village has fewer job opportunities, local services, facilities, and other infrastructure in comparison to larger settlements in the District. To reflect this understanding, Beaumont has been allocated fewer homes relative to other parts of the District. Whilst we understand any amount of development can impact local character and the environment, these smaller allocations are needed in order to meet national housing targets. The Council will continue to work with infrastructure providers, such as Essex Highways, Anglian and Affinity Water, the NHS/ICB, and other relevant partners to ensure development is supported with the adequate services and facilities.
1032	3657	Ms Jacquie Wilkes [1032]	Also important to consider maintaining agricultural land for local food production	Support	Noted. Agricultural land is supported in Policy PP13, in that the Council may grant planning permission for development such as agricultural dwellings and buildings that are essential to support agriculture. The Council acknowledges concerns about building on fields and agricultural land. However, due to the rural character of the District and high national housing targets to meet, it is inevitable that most development must take place on greenfield land.
1030	3693	Mr Paul Lewis [1030]	Unlikely that many additional homes will be purchased by people who work locally, rather commuters working in the capital. More jobs would indeed be welcomed, especially in the sectors mentioned, but confirmed buy in from companies in those sectors need to be in place before proceeding.	Object	Concerns with regard to housing numbers are understood and noted. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. That being said, affordable homes, specialist accommodation, and other forms of housing which meet the needs of the local community are supported through the Local Plan (See Chapter 5 for more information). The Council's Strategic Housing Market Assessment uses evidence-based methodologies to inform on what types of

					housing are needed and where they are needed throughout the District. This includes assessments on the size of homes, housing tenure, and housing affordability. Please see the document linked above for more information.
1064	3762	Mrs Elizabeth Sadler [1064]	There are virtually NO employment opportunities in this area !! Agriculture and fishing industries stopped years ago;we have no factories and no High Street with thriving businesses; it is all secondhand and charity shops. People who move here to commute to work find that it is too expensive to travel out of the area ,so end up moving nearer to London. There is no finance in the area because we are basically a retired dependent community .	Comment	The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan.
752	3795	Mr Christopher Walpole [752]	This is complete really very hard to see whom and what employment opportunities will exist in the gateway between Harwich and Colchester , an area with growing unemployment and associated issues related to current over population within the area . Of course some businesses will chose to relocate to new development areas as occurs already but many are only relocations with very limited further employment opportunities, this does not account for the 7500 homes yet to commence on the Colchester / Tendring borders. Sustainability improvements are hard to envisage grade one farmland loss and natural wildlife habitats	Object	The Council acknowledges concerns about building on open space and agricultural land. However, due to the rural character of the district and high national housing targets, it is inevitable that most development must take place on greenfield land. The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan.
1107	3878	Mr Philippe Whyte [1107]	A very nice idea, but there is no future for business in this country, renewable energy is a Unicorn led pipedream	Comment	The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan.
616	3890	Mr Kevin Everitt [616]	I support the need for economic growth and to help local businesses grow, but believe this should be put in place first. Encourage business to the area and build the housing demand to meet that need.	Support	Whilst concerns with regard to the local economy are noted, there needs to be homes for employees in order for businesses to move to the District. The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan.
1352	4039	Mrs Paula Bland [1352]	Tendring is on the coast which comes with its own problems. Look at all coastal towns to identify the lack of employment opportunities and the poverty that comes with it. It would be great to see more employment but realistically what company, unless involved with shipping/transport, is going to relocate to a district which is bordered by the North Sea. There's no through input. Lack of past investment means we do not have the skill set in this area and why would those with skills chose to move to an area where salaries are depressed.	Comment	The Council acknowledges that there is social-economic deprivation within the District. Several policies in Chapter 6 of the Local Plan seek to address issues relating to shop closures, declining footfall, and unemployment. Additions to Chapter 6 of the updated Local Plan include Policy PP6a, which supports sustainable economic growth through extensions to existing employment sites in the countryside. Similarly, Policy PP7 has been updated to support additional allocations for employment sites. These employment sites will encourage job creation and support the local economy.
581	4051	Mrs Sally Webb [581]	The ageing population of the area does not sit well with the objectives of the policy. elderly people require care which is a lowly paid job and no in line with the prices of housing in this area.	Comment	The Local Plan reflects the Employment Land Review and seeks to make provision for a range of employment sites across the District on both a quantitative and qualitative basis. While the Council recognises the importance of smaller-scale and higher-value employment

					development, it also considers that a range of site types and uses is necessary to meet identified needs, support economic growth and provide choice and flexibility in the market. This is particularly important to meet the high growth 'policy on' scenario within the Employment Land Review. All allocations have been subject to a sustainability appraisal, together with environmental and landscape assessments.
1373	4202	Mrs cindy BROWNE [1373]	There are no job opportunities in great Oakley which would support home ownership all those living within the area would need to travel for work, this would increase pollution.	Comment	Though the Council accepts that housing developments in smaller rural villages, such as Great Oakley, are generally less sustainable than sites allocated within or around towns and villages, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. This approach also contributes to the Council meeting the expectation that at least 10% of the housing requirements should be accommodated on sites of one hectare or less, as set out in national planning policy. As Great Oakley is designated as a Smaller Rural Settlement within the Local Plan, it is understood that the village has fewer job opportunities, local services, facilities, and other infrastructure in comparison to larger settlements in the District. To reflect this understanding, Great Oakley has been allocated fewer homes relative to other parts of the District. Whilst we understand any amount of development can impact local character and the environment, these smaller allocations are needed in order to meet national housing targets. With regard to concerns with travel, the Local Plan promotes active travel networks in Policy CP1 and encourages applications to include proposals for safe, direct and attractive walking and cycling routes that link to existing networks.
1383	4225	Mrs Joanna Thornicroft [1383]	The proposal does not include any employment opportunities, and simply increases the need to travel to centres where there is employment	Comment	The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan.
1382	4232	Ms Tamasin Davies [1382]	Motherhood and Apple Pie - the plan is rich in its wish list but poor on how to move beyond wishing - how will conditions for growth and well paid jobs be achieved. 30 new houses in Wrabness means up to 60 additional cars. There are few work opportunities here - new home owners will be travelling almost certainly by car to jobs in surrounding local towns or to London. - I doubt many of the people working in 'projected' renewable energy, care and assisted living will be able to afford a mortgage on the new houses.	Comment	The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan. The Local Plan reflects findings of the Employment Land Review, as well as the Strategic Housing Market Assessment, to understand the needs of the District. Please see the above-linked documents for more information.
1391	4254	Mrs Laurence Dewey [1391]	The proposed plan does not explain how the building of 4000 homes should attract a thriving industry. It is well-known that similar large-scale developments, in Mid to South Essex, previously, have had little impact on major new industries moving in to the area.	Comment	The Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East

			The fact is that London remains the city where people commute to in order to find a wide range of employment opportunities and higher paid jobs. Such large scale housing developments end up being soulless dormitory towns and the job created are the entry level :retail and hospitality.		to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan. Whilst the Council understand concerns around the target, it should be noted that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. To meet this target, the Council has chosen an approach that consists of both smaller and larger housing allocations.
529	4494	Mr Geoff Kurnatowski [529]	Tendring has higher unemployment than the rest of Essex. There are few jobs in the area and many people travel by car out of the area for employment. The A120 from Harwich to Colchester is extremely busy with people travelling AWAY from Harwich towards the colchester area and beyond each morning, and travelling back in the late afternoon/evening. Housing developments should be concentrated in areas where jobs ARE available. The issue of travelling out of the area for work is only going to get worse as more businesses demand that employees return to the office following the homeworking covid years.	Comment	The Council understands concerns with regard to new house building locally. However, the Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. To meet this target, the Council has chosen an approach that consists of both smaller and larger housing allocations. It is understood that the smaller allocations are often not located in areas which have many job opportunities. However, these allocations are essential to meeting the Council's short-term housing targets. Chapter 6 of the Local Plan addresses concerns with regard to unemployment and economic deprivation in rural areas and the District more widely. Additions to Chapter 6 of the updated Local Plan include Policy PP6a, which supports sustainable economic growth through extensions to existing employment sites in the countryside. Similarly, Policy PP7 has been updated to support additional allocations for employment sites. These employment sites will encourage job creation and support the local economy.
1510	13818	Julie and Trevor Cottee [1510]	How will the potential development [SAH2] reduce the need to travel for work? How will this provide employment apart from the trades connected with the build. How will this provide conditions for economic growth?	Comment	These concerns are noted. The development in Walton will be supported by the promotion of shops and leisure attractions, which will bring new economic vitality to the area and town centre. In line with Policy PP14, Walton-on-the-Naze is identified as a priority area for regeneration, which will bring about new opportunities for jobs and retail growth. This is supported by Policy PP15, which outlines the restoration of Walton Mere. With these improvements locally, those who live in Walton will not have to travel as far to reach employment and retail opportunities. Please see Chapter 6 for more information.
1495	14182	Martine Ward [1495]	Commercial expansion within village boundaries is placing increasing pressure on nearby residential areas. In Elmstead, the petrol station sits directly inside the village, meaning any intensification of activity has an immediate impact on the surrounding community. The installation of larger pumps seems to have already begun, even though demolition and the main construction phase have not yet started. Despite this, residents	Comment	Concerns with regard to local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local

			are already expressing strong concern about the scale of the redevelopment and the risks associated with placing a high-intensity commercial site in such close proximity to homes and pedestrians. The location of this petrol station on a high-speed corridor further increases safety concerns. A previous near-miss incident involving a vehicle entering the site highlights the vulnerability of this stretch of road. With larger pumps, increased traffic movements, and the introduction of a fast-food outlet, the potential for collisions and serious incidents rises significantly. The combination of high-speed traffic and a busy commercial forecourt within a village setting creates risks that cannot be ignored. These impacts form part of the wider cumulative pressure affecting Tendring. As more developments progress, commercial intensification risks eroding residential amenity, increasing safety hazards, and contributing to the loss of rural character. The Neighbourhood Plan must ensure that commercial growth is managed responsibly, with clear policies that protect residents from excessive noise, traffic, and safety risks. Future development should not be allowed to compromise the wellbeing or security of communities living in close proximity to these sites.		Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. Regarding construction concerns, Policy SPL3 outlines criteria that must be met by all new development and states that, *"during the construction phase, developers must comply with a 'considerate constructors' scheme' which employs reasonable measures and techniques to minimise and mitigate impacts and disturbance to neighbours and the existing wider community and any damage to public and private property."* In addition to the 'considerate constructors' scheme, SPL3 also requires that developments must not have unacceptable levels of pollution. The Council these understands concerns and will continue to work with developers to ensure construction is sensitive to the local community.

Objective 2: Employment/Commercial

Summary of Representations

Objective 2 received general support from technical stakeholders, businesses/landowners/developers, and community representatives. Members of the public expressed concerns with regard to the poor economic opportunities in Tendring, with an emphasis on high business rates, few job opportunities, a lack of public transportation, and an aging population. Many argued that the new development would increase the need to travel whilst failing to provide a diverse range of economic opportunities locally. Comments were also made which criticise the Plan for proposing development on greenfield and agricultural land.

In response, the Council would like to reiterate that many policies in Chapter 6: Prosperous Places of the Local Plan seek to address concerns with regard to the socio-economic conditions throughout the District. Based on the representations submitted for Objective 2, there are no changes needed to the text.

Objective 3: Town Centre Development

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
148	14460	Environment Agency (Environment Agency) [148]	We agree with the vision statement for the Tendring District and Objectives 1,2 and 3.	Comment	Noted.
Businesses, Landowners and Developers					
136	4349	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	As previously stated for objective 1.	Support	Noted.
Community Representatives					
953	3462	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
Members of the Public					
597	3453	Miss Stacy Willis [597]	With how Tendring council handled to closing of the Brightlingsea sports centre I see all your councillors as being useless, as you seem to have enough money to waste on Clacton and Jaywick where until society changes antisocial behaviour and vandalism diminish this will alway continue to be at its highest due to the demography of residents in the area. The town centre will be non existent in the future and our towns and cities overrun with non british nationals. I am glad my grandparents are now dead due to the mess of the country and our local councillors.	Object	The Council seeks to improve environmental, economic, and social outcomes for residents across the District. This is reflected through the Vision of the Local Plan as well as the policies throughout the document. Please see Chapter 6 for more information.
580	3569	Mrs Caroline Mitchell [580]	Will parking be considered with new development? We are finding that parking locally is restricted, for example in the Coop car park in Manningtree there is now only 2 hours. Harwich can also become very busy and difficult to find parking.	Comment	Concerns with regard to parking are noted. The Local Plan has included guidance on parking through several policies to address this issue. Policy SPL3, criteria k, states that all new developments must provide *"appropriately sized and well-designed private amenity space that meets residents' needs and reflects the dwelling size and local character, together with adequate waste and recycling storage, and vehicle and cycle parking (including electric vehicle provision) in accordance with the latest EPOA Parking Guidance"*

					Policy LP4 supports well-designed parking provision as well, and, similarly, Policy LP11 supports adequate parking for proposals involving HMOs. The Garden Villages will each have their own parking approaches. Apart from policies within the Local Plan, the Council has updated its Infrastructure Delivery Plan, which will provide data on where infrastructure, such as parking, is required throughout the District.
969	3572	Mr Scott Gilmour [969]	Town centres are essential to the health of the district at large. As the town itself grows, I would not object to major changes occurring, presuming it aims to improve well being of residents. Such as large constructions that may border on altering the existing character. Especially if it allows more residents to walk, wheel, cycle, take transit etc within the town centre. Furthermore this could be a way of mediating greenfield development, which many residents are concerned with.	Comment	Support for town centre development is noted.
987	3615	Mrs Erin Stokes [987]	I object to this proposal. While supporting town centres is important, the policy is vague and growth-focused without clear safeguards for heritage, independent businesses, and local character. “Enhanced growth” and “appropriate uses” are undefined and could permit overdevelopment or unsuitable uses that undermine valued features. There is no firm commitment to managing traffic, parking pressures, or the impact on nearby residential areas. The approach appears reactive to competition rather than rooted in a clear, locally distinctive vision that prioritises community needs over expansion.	Object	It should be noted that, whilst the objective is vague in its wording, there are several policies in Chapter 6 of the Local Plan which support its overarching goals.
1032	3658	Ms Jacquie Wilkes [1032]	Current practice seems contrary to this, for example out of town developments have destroyed town centres and caused congestion . Local services essential to maintain character of individual towns and limit the need to drive	Object	Though the Council accepts that housing developments in smaller rural villages are generally less sustainable than sites allocated within or around towns and villages, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government’s ambitious housing targets. This approach also contributes to the Council meeting the expectation that at least 10% of the housing requirements should be accommodated on sites of one hectare or less, as set out in national planning policy. The Council agrees that local services are essential in supporting active travel in developments and to contribute to local place making. This is reflected in how the Garden Villages are set to be developed, aiming to provide all the required services and facilities locally so that residents do not have to travel far for every-day needs. Policy HP2 sets out the Council’s intent to work with the development industry and key partners to deliver and maintain a range of new community facilities across the District.
1030	3695	Mr Paul Lewis [1030]	This is badly needed to improve the well being of all Tendring residents.	Support	Noted.
1064	3763	Mrs Elizabeth Sadler [1064]	There is no opportunity for growth and businesses because most people in this area are RETIRED. There are no available retail shops ,only supermarkets. The nearest retail area is in Colchester some miles away. There can be NO competition for trade because there is NO trade and nowhere for people to enjoy shopping. It is very highly unlikely that anyone is going to invest in the area because there is no capable working force.	Comment	The Council is working to help give younger people a fairer chance living and working in the area through the provision of affordable housing in combination with an increase in employment sites, an education and skills hub, and town centre improvements. The Council also seeks to improve business and retail throughout the District through policies outlined in Chapter 6, Prosperous Places,

					which focus on town centre improvements, employment sites, and retail growth. Together, these policies seek to improve economic outcomes across the District for all demographics.
1148	3862	Mr David Green [1148]	Brightlingsea town centre is reasonably successful but with limitations. The proposed new housing is likely to be for people who work out of town so the benefit to the town will be limited. Even with the recent developments the turn over of shops is significant so increasing population will not see major benefit to the town. The detrimental effect will far outweigh any perceived benefit due to increased pressure on essential services. The changes in shopping habits to out of town or on line will mean that town traders will not gain much if at all.	Object	Officers have provisionally suggested that development in Brightlingsea (SAH4), be removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, it is suggested that two smaller sites are included within the urban area of Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. However, the Council will continue to work with the relevant infrastructure providers and partners to ensure development is supported with the adequate facilities and services.
1107	3879	Mr Philippe Whyte [1107]	Just looking at Connaught Avenue in Frinton, which is supposed to have protected shop fronts, this policies are either never carried out or not enforced. I hope I am wrong.	Comment	Additional planning guidance, including conservation area appraisals and shopfront design guides, sit alongside the Local Plan. Although these documents are not being considered directly through the Local Plan Review, the Council will seek to secure the highest level of design, wherever possible.
616	3891	Mr Kevin Everitt [616]	The local towns are dying as shopping areas, they need investment and more controls in place to help business to stay and develop, building more houses will only encourage more vape, barbers, nailbars and takeways without proper controls in place and encouragement for real business opportunities.	Comment	The Council agrees that town centres need to become more diverse in their offer. Policies in the Local Plan aim to embrace more leisure-based activities, support a vibrant evening economy, and use the internet as a promotional tool. Chapter 6 of the Local Plan sets out policies which address retail, leisure, and office development in greater detail.
1352	4038	Mrs Paula Bland [1352]	We are all dismayed at the demise of the town centre but reality is that shopping on line/out of town retail parks have taken over and that apart from personal services such as cafes, hairdressers, barbers and nail bars there is no need to visit a town centre. Any shops that do try to open are doomed for failure due to lack of real footfall. Clacton town centre is so grubby and poorly maintained why would one want to go there? Parking is excellent as is the sea front. Clacton needs cleaning and not just when the Prime Minister visits!	Comment	Noted. The Council agrees that the maintenance of town centres is very important. Matters such as the upkeep of pavements and footpaths, litter collection and the condition of vacant units play an important role in supporting the attractiveness and vitality of town centres.
581	4050	Mrs Sally Webb [581]	Unless high street rates are able to be lowered there will only be the chairty shops left apart from cafes and barber shops	Comment	The Council agrees that town centres need to become more diverse in their offer. Policies in the Local Plan aim to embrace more leisure-based activities, support a vibrant evening economy, and use the internet as a promotional tool. Chapter 6 of the Local Plan sets out policies which address retail, leisure, and office development in greater detail.

1383	4226	Mrs Joanna Thornicroft [1383]	Totally support appropriate development when facilities also exist	Support	Noted. With regard to infrastructure, it is noted that strained services are a concern to members of the public. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. Further to that, the Council will continue to work with infrastructure provider s, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers throughout the development process.
1382	4235	Ms Tamasin Davies [1382]	Promoting the vitality and viability of town centres is a challenge everywhere - Tendring expresses a worthy aim here - there is a danger that the housing part of the plan may create dormer estates with residents driving elsewhere for activities, entertainment and socialisation.	Comment	Though the Council accepts that housing developments in smaller rural villages are generally less sustainable than sites allocated within or around towns and villages, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. This approach also contributes to the Council meeting the expectation that at least 10% of the housing requirements should be accommodated on sites of one hectare or less, as set out in national planning policy. The Council is supporting active travel through policies such as Policy CP1, which encourages planning applications to include proposals for safe, direct, and attracting walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
1391	4255	Mrs Laurence Dewey [1391]	The number one characteristic of living in rural communities is precisely to be closer to the natural world and away from huge retail parks, not to be overwhelmed by huge amount of retail activity. Most people choose to settle in rural communities as a way of life, to be away from the hustle bustle of towns and shops. Colchester, Clacton-on-Sea and medium size towns like Manningtree, provide all the retail and leisure provision needed. The creation of an entirely new town is excessive and will seriously alter the character of the area.	Comment	Concerns with regard to local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. Officers continue to advise that, without the introduction of the Garden Villages, it will be questionable if Tendring can realistically meet housing targets set by the Government. The Council will be working with Essex County Council, National Highways, and other stakeholders to carry out the necessary phase of transport modelling and updates to the Infrastructure Delivery Plan to inform final judgements.
1510	13820	Julie and Trevor Cottee [1510]	How will this development [SAH2] promote retail and other appropriate and adaptive uses?	Comment	Please see Chapter 6 for more information on retail policies and town centre development. Though SAH2 may not directly contribute to economic objectives, the housing allocation does contribute to overall housing targets set by the Government.

Objective 3: Town Centre Development

Summary of Representations

Objective 3 received general support from technical stakeholders and businesses/landowners/developers. Members of the public commented on the poor economics throughout the District, particularly in regard to Clacton and Jaywick. Concerns with regard to parking and traffic were also stated, highlighting the difficulty of navigating town centres with the use of a car. Some respondents stated that additional development within town centres lack safeguards to heritage, independent business, infrastructure and local character, potentially impacting those who live locally. Additional comments stated the need for a more diverse town centre, with a greater diversity in shops and services. However, those in support of the objective emphasised the ability for town centre improvements to limit the need to travel by car, as those living locally would be able to walk or cycle to essential shops and facilities.

In response, the Council has noted all concerns and comments with regard to town centre development. More detailed policies with regard to town centre improvements can be found in Chapter 6: Prosperous Places of the Local Plan. Based on representations submitted for Objective 3, there are changes required to the text or content.

Objective 4: Infrastructure Provision

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
791	3706	Sport England (Mr Roy Warren, Planning Manager) [791]	Support is offered for this objective as this would support the promotion of active travel opportunities in new development which in turn would encourage physical activity. However, it is requested that the scope of the objective is extended to beyond Public Health as a range of partners will be involved in achieving this objective. This is exemplified by the Essex Local Delivery Pilot initiatives in Tendring district that are focused on encouraging active lifestyles which involve a range of partners including the NHS, Active Essex and the local voluntary sector as well as the local authorities (including ECC Public Health).	Comment	These suggestions are noted and have been taken forward in the updated Local Plan.
1654	6670	Natural England (Jonathan Burt) [1654]	We note that the plan's overall vision and objectives are broadly aligned with natural-environment goals, particularly the inclusion of Green and Blue Infrastructure in Objective 4.	Support	Noted.
6	13452	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	We support the inclusion of flood risk management infrastructure and to ensure adequate capacity in the foul water sewerage infrastructure (which should address both our WRCs and networks).	Support	Noted. The Council will continue to work with partners, such as the Environment Agency, Affinity Water, and Anglian Water, to ensure adequate capacity at facilities is secured alongside development.
823	13583	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Special Education Needs and Disabilities (SEND) Provision ECC has a statutory responsibility to plan for and deliver special education needs and disabilities (SEND) facilities. Special needs may be met in a mainstream school, a specially resourced or enhanced provision within a mainstream school or in a special school depending upon the level of need. If the new development results in additional children in this area, then ECC will be required to provide a special need provision to 1.3% of the population. 2.1% of the population should be able to have their SEND needs met in a mainstream school, as outlined in section 5.2 of the ECC Developers' Guide to Infrastructure Contributions (Developers' Guide). This identified total outstanding LP new development requirement of 7,400 houses could result in SEND requirements for 78 pupils requiring an EHCP in mainstream school and a further 48 requiring a special school placement, which would be significant enough to warrant new provision within a mainstream school or the expansion of an SEN school within the location. As set out in the Developers' Guide, DfE guidance 'Securing developer contributions for education' (November 2023) recommends that developer contributions for special or alternative school places are set at four times the cost of mainstream places which is consistent with the space standards in DfE Building Bulletin 104. Add bullets to require: Safeguarding and delivery of LCWIP corridors; bus priority/Rapid Transit-ready corridors and mobility hubs	Comment	Although these specific statistics and responsibilities relating to SEND Provision are not referenced within the Vision of the Local Plan, this representation has been shared with our consultants preparing the Infrastructure Delivery Plan, and will be considered accordingly. LCWIP corridors, bus priority/rapid transit-ready corridors, and mobility hubs are addressed in Chapter 8 of the Local Plan and, therefore, it is not necessary to include these topics within Objective 4.

			ECC welcomes the Vision's commitment to green and blue infrastructure, a landscape-led approach, urban greening, biodiversity net gain and nature recovery. We also support Objectives 4 and 8, which seeks to deliver an integrated and connected multifunctional green and blue infrastructure network aligned with the Essex Local Nature Recovery Strategy and delivery biodiversity net gains.		
48	14369	Essex Police [48]	Chapter 2 – Vision & Objectives Objective 4: Infrastructure Provision (Page 20, paragraph 2.7) Insert a new paragraph at the end as follows; "To ensure there is adequate police, fire & rescue and ambulance infrastructure & facilities capacity, & where additional capacity is required in the form of new or upgraded infrastructure/ facilities, to ensure this is provided in a phased & timely way in connection with new development"	Object	These suggestions have been noted and have been taken forward in the updated Local Plan.
148	14461	Environment Agency (Environment Agency) [148]	In Objective 4 we note and support the Council's identification of the need to consider flood risk management requirements both now, and in future, taking into account the impacts of climate change and the potential for adaption where necessary. We hope that the Council will use CIL and Section 106 agreements to support partnership funding requirements for future flood defence infrastructure and improvements, where the sustainability of those developments will be reliant on that infrastructure over their lifetimes.	Comment	Whilst these comments are noted, funding that is a part of S106 cannot mitigate existing issues in the District. Therefore, this is unlikely to be taken forward. Please see Chapter 7 for more information on flood mitigations.
Businesses, Landowners and Developers					
136	4353	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	ditto comments for Objective 1.	Support	Noted.
Community Representatives					
953	3463	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
258	13596	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	The garden villages make good use of the main routes into the district; Additionally, the Hare Green garden village potentially will create a new road connection to Harwich.	Support	Noted.
1110	3816	Lawford Parish Council (Cllr Giancarlo Guglielmi, County,	We support the strategic objectives Infrastructure Provision and it is vital that these are delivered either before or in tandem with development proposals.	Support	Noted.

		District, and Parish Councillor) [1110]			
270	14560	Little Bentley PC (Dawn Sauka, Clerk) [270]	The proposals fail to meet basic tests of economic and environmental sustainability. Tendring's most deprived coastal communities, particularly Clacton, are being overlooked despite strong evidence supporting housing-led regeneration in these areas. Instead, housing growth is being diverted to speculative new settlements in open countryside, disconnected from existing communities, jobs, services and infrastructure. This represents a missed opportunity to address long-standing poverty, poor health outcomes and economic decline. Environmentally, creating new settlements with no existing services or sustainable transport would lead to car-dependent dormitory towns, which is fundamentally inconsistent with the principles of sustainable development.		The Council is aware of the range of Nationally Significant Infrastructure Projects (NSIPs) affecting the District, all of which are at different stages of development. It recognises that this is a dynamic and evolving situation, with projects such as the Norwich to Tilbury transmission line, North Falls, Five Estuaries and the Tarchon Interconnector progressing through pre Development Consent Order (DCO) and DCO stages and forming part of nationally important infrastructure delivery. The Council will continue to balance the need to meet Government requirements for housing, employment and supporting infrastructure with the requirements and potential impacts of these NSIPs. It is actively engaging with project promoters and relevant stakeholders to ensure a coordinated and constructive approach. The Local Plan is intended to be sufficiently flexible to respond to the progression of NSIPs. Site allocations, including those referenced in the representation, are capable of coming forward alongside nationally significant infrastructure, taking into account the stage of the relevant DCO process. More detailed matters relating to site-specific impacts and interactions will be addressed through subsequent Development Plan Documents (DPDs), the development management process, and, where relevant, the DCO regime. This approach ensures that the Plan remains effective, deliverable, and consistent with national policy, while retaining the ability to respond to the evolving NSIP programme.
Members of the Public					
969	3573	Mr Scott Gilmour [969]	It is great that sustainable and active travel opportunities are promoted in the objective. Cycle lanes/Wide shared paths are essential to providing choice, especially with an aging population that may need to use mobility scooters. Houten's urban design is incredibly unique and demonstrates how a place that prioritises people could look. To make efficient use of existing transport infrastructure, building around rail stations should be prioritised due to the spare capacity available. It would also compliment the strong post covid growth of the rail network in Tendring.	Support	Noted. The Council agrees that residents should have access to multiple modes of travel. Policy CP1 of the Local Plan outlines that all applications for major developments should include proposals for "safe, direct and attractive walking and cycling routes that link to existing networks". The Council agrees that growth should be near transportation hubs, such as railways, road networks, and public transportation. The Settlement Hierarchy set out in policy SPL1 outlines the growth strategy for the District, focusing development in areas which are more sustainable. However, some growth is not located in such areas due to the change in housing targets set by the Government. Although the Council has prioritised growth in sustainable areas, some developments must take place within villages with fewer job and retail opportunities, less infrastructure, and greater environmental constraints.

987	3616	Mrs Erin Stokes [987]	I object to this proposal. While the aims are positive, they rely on broad intentions rather than firm, enforceable commitments. There is no guarantee that transport, sewerage, flood defences, healthcare, or broadband will be delivered before or alongside development. Phasing is mentioned but not clearly defined or secured. The policy risks growth proceeding ahead of infrastructure capacity, placing pressure on existing communities and sensitive environments. Stronger safeguards and binding delivery mechanisms are required to ensure infrastructure truly leads, rather than follows, development.	Object	To address concerns relating to infrastructure phasing, the Council has carefully considered infrastructure capacity alongside the requirement to plan positively for growth in accordance with national policy. It is recognised that there are existing pressures on infrastructure, and the Council has identified a very significant funding gap associated with addressing historic deficits. However, seeking to fully resolve these issues prior to accommodating any further development would not be realistic in practice and would be likely to significantly constrain growth, with wider social and economic consequences. Decisions of that nature are more appropriately addressed at a national government and strategic funding level. Ultimately, the Council has a duty to positively plan for future growth having regard to evidence and the governments new method for calculating housing need. The planning system is designed to secure infrastructure improvements alongside development, particularly through larger-scale, plan-led allocations, but also through smaller schemes via developer contributions and planning obligations. The Council's approach, as reflected in the Plan and supporting Infrastructure Delivery Plan, is to take a balanced and coordinated view—ensuring that growth supports the delivery of new and improved infrastructure, rather than preventing development altogether.
988	3620	Mrs Carla Leonard-Wrigjt [988]	Beaumont - the proposed area for development already does not have mains sewage this regularly goes wrong with a new alarm system fitted recently, there is also no gas, and without generators if electricity fails. Internet service upgrades do not compensate for face to face interaction, putting more people in an isolated area will not enhance village way of life but create an even greater dependency on external support. How does destroying the landscape on top of a beautiful hill support the local nature recovery plan? How would drainage services be addressed? Subsidence?	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council is has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so. The Council acknowledges concerns about landscape character. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. With regard to flood risk and drainage, there are policies in place throughout the Local Plan which promote Sustainable Drainage Systems alongside developments. With reference to Policy PPL1, all development must include the appropriate measures to respond to the risk of flooding on and/or off site. Developments proposed within the Flood Zone involving sites of 1ha or more must be accompanied by a Flood Risk Assessment, which outlines risk and often requires Sustainable Drainage plans for the project. Further details with regard to how sustainable drainage systems and planned and implemented are dealt with by the Development Management team at TDC. The Council also acknowledges the importance of community facilities for the social health of the District. Policy HP2 states the Council will work with the development industry and key partners to deliver and maintain a variety of community facilities. In addition to this policy,

					policies aiming at town centre and village centre improvements will encourage residents to enjoy local public spaces. Please see Chapter 6 of the Local Plan for more information.
989	3629	Mr Lewis Leonard-Wright [989]	Beaumont - the proposed area for development already does not have mains sewage this regularly goes wrong with a new alarm system fitted recently, there is also no gas, and without generators if electricity fails. Internet service upgrades do not compensate for face to face interaction, putting more people in an isolated area will not enhance village way of life but create an even greater dependency on external support. How does destroying the landscape on top of a beautiful hill support the local nature recovery plan? How would drainage services be addressed? And Subsidence?	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council is currently updating its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so. The Council acknowledges concerns about landscape character. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. With regard to flood risk and drainage, there are policies in place throughout the Local Plan which promote Sustainable Drainage Systems alongside developments. With reference to Policy PPL1, all development must include the appropriate measures to respond to the risk of flooding on and/or off site. Developments proposed within the Flood Zone involving sites of 1ha or more must be accompanied by a Flood Risk Assessment, which outlines risk and often requires Sustainable Drainage plans for the project. Further details with regard to how sustainable drainage systems and planned and implemented are dealt with by the Development Management team at TDC. The Council also acknowledges the importance of community facilities for the social health of the District. Policy HP2 states the Council will work with the development industry and key partners to deliver and maintain a variety of community facilities. In addition to this policy, policies aiming at town centre and village centre improvements will encourage residents to enjoy local public spaces.
1032	3659	Ms Jacquie Wilkes [1032]	Flood defences and sewage also need to consider existing housing and plans for upgrading these are essential. Small towns don’t always have good transport links and local services required. For example the loss of a sports centre in Brightlingsea impacts on people’s health as it is not practical to travel to Clacton with poor and lengthy transport links	Comment	Planning can only mitigate against those issues caused by applications themselves, rather than existing matters. Therefore, it is unlikely this comment will be taken forward. Whilst concerns with regard to transport links are noted, the Local Plan includes wording which supports active travel and connected places. Policy CP1 of the Local Plan outlines that all applications for major developments should include proposals for “safe, direct and attractive walking and cycling routes that link to existing networks”. Similarly, the Settlement Hierarchy set out in Policy SPL1 prioritises locations with existing access to public transport and amenities and identifies locations where new settlements can also be developed at a

					scale where growth can be supported by infrastructure and employment opportunities.
580	3662	Mrs Caroline Mitchell [580]	There are many good points within this document but there is little detail about how the council will achieve the things prefaced with: ' To ensure...' for example how will the council '...ensure that new growth brings opportunities'.	Comment	Whilst it is understood the objective lacks detail about how infrastructure and opportunities will be secured through development, this can be better understood throughout policies in Chapter 6 of the Local Plan, as well as additional documents, such as the Infrastructure Delivery Plan which are part of the Local Plan's Evidence Base.
1034	3663	Mr Dean Garwood [1034]	When planning applications are made to TDC, there should be a requirement at the initial stage to include provision within them for flood and sewerage management, and any additional requirements identified should be paid for by the developer. Flooding in the Kirby Cross, Kirby le Soken and Walton areas is already a serious issue, and the council will be more than aware of the recent issue with sewerage problems in Walton. Continuing to build on Green soak away areas, and overloading the existing Sewerage system will only exacerbate these ongoing problems.	Object	With reference to Policy PPL1, all development must include the appropriate measures to respond to the risk of flooding on and/or off site. Developments proposed within the Flood Zone involving sites of 1ha or more must be accompanied by a Flood Risk Assessment, which outlines risk and often requires Sustainable Drainage plans for the project. Further details with regard to how sustainable drainage systems and planned and implemented are dealt with by the Development Management team at TDC.
1047	3684	Mr Connor Morris [1047]	The roads into and within Brightlingsea aren't for to take in any more traffic, they are more often than not in a state of disrepair as it is, with the council generally taking a long time to address even the most severe potholes etc.	Object	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. Despite this change, the Council will continue to work with infrastructure providers, such as Essex Highways, to ensure that the necessary infrastructure is provided alongside development.
1030	3696	Mr Paul Lewis [1030]	Bus services badly in need of improvement Broadband access needed to full market Limit amount of development to protect nature Flood risk management to be a priority for new developments Foul water drainage already at limits in existing communities	Support	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
526	3735	Mr kevin millar [526]	Residents in general feel the need for new houses and understand the governments thoughts behind this but without the infrastructure in place this will make current residents standard of living poorer. Current transport links are not suitable to allow these houses to be build. The A133 from Weeley must be made into a 2 lane carriage way or the entire district east of this point will come to a halt, affected growth and the tourist industries. This along with doctors, dentists, schools, power supplies, water supplies and police officers should be in place before building commences as per government guidance.	Comment	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will also continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.

1064	3764	Mrs Elizabeth Sadler [1064]	The infrastructure in this area is appalling and has prevented people from moving to the area. The two main roads are pot holed, narrow and with poor surfaces. As we are on a peninsula ,what traffic comes in it has to return the same way and this is a HUGE problem ,particularly during fine weather when thousands arrive for the beach; there is gridlock and there are no toilet facilities in the town. We are mostly on flood plain and I remember in the 50's flooding came through the backwaters ,swept through the town and cut off the Naze.	Comment	With regard to infrastructure, it is noted that strained services are a concern. The Council has recently updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will also continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
752	3796	Mr Christopher Walpole [752]	The current infrastructure is woefully inadequate , the key road route being the A12 is grossly overcrowded and with not further plans to improve the route any planned further development is really complete madness , the other main link road being the A120 is becoming more and more congested due to current housing developments , in its current state it is hard to envisage is coping with 7500 additional properties let alone huge developments at Frating , Weeley , Harwich and Horsley cross . Alternative transport links by bus or rail are also poor with parking issues already saturated	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council will also continue to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1148	3863	Mr David Green [1148]	One road in that is already, at times, saturated. An increase of potentially 6-700 cars will only make matters much worse. The safety aspects of the main site by the church must be considered as any increase will double the danger. Brightlingsea has significant natures resources but the scheme will remove more of our wonderful natural surroundings. Pollution will increase, red list birds will be more at risk and other wildlife also will suffer. Our water and sewage systems are stretched and unlikely to be improved to cope.	Object	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. The Council will continue to work with the relevant infrastructure providers, such as Essex Highways and Anglian Water, to ensure the adequate infrastructure is delivered alongside the development.
1107	3880	Mr Philippe Whyte [1107]	This suspiciously sounds like "15 Minute Cities". There is no way you are going to be able to fulfil this. Also the building on fields will increase flood risks.	Object	The Council recognises concerns about the loss of agricultural land and the preference for development on brownfield sites. However, Tendring has a very limited supply of previously developed land, much of which has already been brought forward for development. As a result, and in order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this land is classified as best and most versatile agricultural land. With regard to flood risk and drainage, there are policies in place throughout the Local Plan which promote Sustainable Drainage Systems alongside developments. With reference to Policy PPL1, all development must include the appropriate measures to respond to the risk of flooding on and/or off site. Developments proposed within the Flood Zone involving sites of 1ha or more must be accompanied by a Flood Risk Assessment, which outlines risk and often requires Sustainable Drainage plans for the project.

616	3892	Mr Kevin Everitt [616]	Regardless of the need and good ideas around transport infrastructure if you look at all previous developments that would have included this within the planning, most people continue to drive everywhere, any development will only add to the traffice issues.	Comment	The Council acknowledges the Local Plan has limitations with regard to residents' travel choices and behaviour. However, there are policies in place to encourage residents to transition from car dependent travel to active travel methods. One example is the inclusion of Policy CP1 within the Local Plan, which outlines that all applications for major developments should include proposals for "safe, direct and attractive walking and cycling routes that link to existing networks". Garden Villages will also seek to provide suitable active travel routes, alongside rapid public transport systems and connections. With these provisions in place, residents will have increased transportation options which differ from car-dependent transportation.
1315	3929	Mrs Kellie Tynan [1315]	The infrastructure of the road into and out of Brightlingsea is poor. At peak times you can wait in traffic to enter the roundabout at thorrington cross for over 20 minutes. How will this improve with extra cars joining from new houses this could be an additional 600 cars. When work is being done on the road traffic queued all the way from Thorrington Cross to Victoria Place. The 1 road in and out cannot cope. The town is just not built for growing.	Comment	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. The Council will continue to work with the relevant infrastructure providers, such as Essex Highways, to ensure the adequate infrastructure is delivered alongside the development.
1350	4006	Prof Mark Lowdell [1350]	What provisions are retained by TDC (and its successsor) to prevent these developments if the developers are unable/unwilling to "enhance the existing services, facilities and infrastructure"? I understand this plan retains no control within the local authority to prevent development on the basis of inadequate road/rail infrastructure and paucity of healthcare, schools and other resources.	Comment	Policies within this local plan seek to secure relevant developer contributions towards infrastructure delivery in accordance with the Infrastructure Delivery Plan, and associated Evidence Base. Developers will be required to enter into legal agreements, in order to ensure appropriate infrastructure is provided at the right time, and these provisions will remain in place following Local Government Reorganisation.
1352	4037	Mrs Paula Bland [1352]	In the rural areas there is very limited public transport which is being cut all the time. Granted part of this is due to lack of use but it won't be used if it isn't available regularly at prices that compete with the cost of running/parking a vehicle (remember Tendring offers free parking after 11am to encourage us to use our towns). There will have to be a massive increase in buses and the routes that they take to even start to encourage residents to use them. How about a direct service to Colchester Business Park that uses the A120?	Comment	The Council also acknowledges concerns surrounding transportation and infrastructure, particularly as it relates to the Garden Villages. Transport modelling and the Infrastructure Delivery Plan have been updated in support of the Regulation 19 version of the Local Plan. These documents will provide the evidence base to transport-based decisions in the District. In the interim, the Council will continue to work with Essex Highways and the relevant infrastructure providers to ensure developments are supported with adequate infrastructure provisions.
581	4048	Mrs Sally Webb [581]	The infrastructure in Tendring is already stressed with no prospect of enhancement. If the extra housing allowance is required it should have the infrastructure first before a spade is put in the ground for building.	Comment	To address concerns relating to infrastructure phasing, the Council has carefully considered infrastructure capacity alongside the requirement to plan positively for growth in accordance with national policy. It is recognised that there are existing pressures on infrastructure, and the

					Council has identified a very significant funding gap associated with addressing historic deficits. However, seeking to fully resolve these issues prior to accommodating any further development would not be realistic in practice and would be likely to significantly constrain growth, with wider social and economic consequences. Decisions of that nature are more appropriately addressed at a national government and strategic funding level.
1373	4203	Mrs cindy BROWNE [1373]	The increase of the planning envelope of Great Oakley would mean that the land available for food production was diminished. Which would deplete food security. If the local plan is agreed this would deplete the hedge rows in the area which would impact on the local wildlife. The increase in light pollution would impact on bat population.	Object	The Council acknowledges concerns regarding rural character. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure.
1376	4209	Mrs Anja Newman [1376]	Current infrastructure already doesn't support existing housing. There is no integrated transport system. Wix/Bradfield residents cannot get either to Manningtree or Thorpe by bus so must drive, further adding to the traffic burden. This makes it increasingly dangerous for cyclists and pedestrians. New houses must have transport links - else non-drivers are disadvantaged. Sewage can currently not be adequately treated in the volumes required. Discharges, not just during storm events are common. Additional housing will only make this situation worse and further pollute our waterways.	Comment	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so. The Council agrees that transport connections and active travel options are important. The Local Plan aims to promote active travel through its policies. One example is the inclusion of Policy CP1 within the Local Plan, which outlines that all applications for major developments should include proposals for “safe, direct and attractive walking and cycling routes that link to existing networks”. Garden Villages will also seek to provide suitable active travel routes, alongside rapid public transport systems and connections. With these provisions in place, residents will have increased transportation options which differ from car-dependent transportation.
1382	4236	Ms Tamasin Davies [1382]	In Wrabness there is no bus service. Trains run hourly to Manningtree and Harwich. Residents will rely on private cars for most journeys - the plan says that Harwich and Mann Sec schools are accessible by train but the stations are a long way from the schools. Primary and nurseries are only accessible by car. The nearest doctor is several miles away and it is not feasible that sick people will travel to the doctors by rail. There is little local employment. Overall the increase in traffic on the narrow lanes and increase in emissions	Comment	The Council acknowledges the need for greater travel options across the District. Policy CP1 has been updated to encourage planning applications to include proposals for safe, direct, and attracting walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council’s emerging LTP4), complement these policies and emphasise the need for active

					travel networks to link town centres, railway stations, schools, and green spaces. The Council will continue to work with the relevant infrastructure providers, such as Essex Highways, to ensure that the adequate infrastructure is provided alongside development to support communities. With regard to employment, the Local Plan seeks to encourage job creation through the allocation of employment land and the promotion of sites such as Freeport East to boost local industries. Specific policies to support these objectives are outlined in Chapter 6 of the Local Plan.
1391	4257	Mrs Laurence Dewey [1391]	Local B roads are already subjected to congestion at peak times. A roads are congested from 5 am until 8pm. There is no clear, credible evidence that the proposed infrastructure would minimize the impact of additional traffic. The "Sustainable" and "active travel opportunities" are not concrete examples of improvement. Longer journey times, reduced road safety and decline of the quality of life are the unavoidable results of 4000 new homes built in the area. Who will or would be accountable if the reality does not match the promises listed in the plan in terms of "water sewerage" or "general upgrades"?	Comment	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so. Transport modelling has been updated, which collects and analyses data as it relates to roads and traffic congestion. Similarly, the Infrastructure Delivery Plan has been updated in support of the Regulation 19 version of the Local Plan, pinpointing where key infrastructure improvements are needed in the District. In the interim, the Council will continue to work with Essex Highways and the relevant infrastructure providers to ensure developments are supported with adequate infrastructure provisions.
1417	4370	Mr reginald tricker [1417]	The text refers to "sustainable and active travel opportunities are promoted in all new development" but this should also emphasise off-site improvements (for walking and cycling, not just for cars/highways), particularly as the current transport network is lacking and just looking internally within new developments will not generate the necessary modal choice opportunities. Providing in a "timely way" should be incorporate an aspiration to be "ahead of development" as this otherwise this is very vague and subjective and liable to lead to late delivery.	Comment	Whilst these concerns are noted, the Local Plan includes wording which supports active travel and connected places. Policy CP1 of the Local Plan outlines that all applications for major developments should include proposals for “safe, direct and attractive walking and cycling routes that link to existing networks”. Similarly, the Settlement Hierarchy set out in Policy SPL1 prioritises locations with existing access to public transport and amenities and identifies locations where new settlements can also be developed at a scale where growth can be supported by infrastructure and employment opportunities. To address concerns relating to infrastructure phasing, the Council has carefully considered infrastructure capacity alongside the requirement to plan positively for growth in accordance with national policy. It is recognised that there are existing pressures on infrastructure, and the Council has identified a very significant funding gap associated with addressing historic deficits. However, seeking to fully resolve these issues prior to accommodating any further development would not be

					realistic in practice and would be likely to significantly constrain growth, with wider social and economic consequences. Decisions of that nature are more appropriately addressed at a national government and strategic funding level. Ultimately, the Council has a duty to positively plan for future growth having regard to evidence and the government new method for calculating housing need. The planning system is designed to secure infrastructure improvements alongside development, particularly through larger-scale, plan-led allocations, but also through smaller schemes via developer contributions and planning obligations. The Council's approach, as reflected in the Plan and supporting Infrastructure Delivery Plan, is to take a balanced and coordinated view—ensuring that growth supports the delivery of new and improved infrastructure, rather than preventing development altogether.
1407	4387	Mr Richard Allan [1407]	The traffic congestion due to having only one access road to the town will have a detrimental effect on the town.	Object	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. The Council will continue to work with the relevant infrastructure providers, such as Essex Highways, to ensure the adequate infrastructure is delivered alongside the development.
571	4403	Mrs Sian Savage [571]	The Neighbourhood Plan for Brightlingsea would only support new development in the town if it meets the priorities of the local residents (affordable homes, homes for an ageing population, sustainable in relation to infrastructure and design). Cycle routes and transport links need to be considered in relation to any new development to ensure that there is safe, environmentally friendly and sustainable links between new development, the town centre and the waterfront areas. There are also flood risks associated with new development in the town due to the island like topography of the area.	Comment	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. Affordable homes, specialist accommodation, and other forms of housing which meet the needs of the local community are supported through the Local Plan (See Chapter 5 for more information). The Council's Strategic Housing Market Assessment uses evidence-based methodologies to inform on what types of housing are needed and where they are needed throughout the District. This includes assessments on the size of homes, housing tenure, and housing

					affordability. Please see the document linked above for more information. Sustainability is also promoted through the Local Plan in Chapter 3 and Chapter 7. Please see the relevant chapter for more detail on how policies support biodiversity, sustainable development, flood risk mitigation, and the historic environment. Further to those Chapters, the Local Plan also encourages active travel networks within new developments. Policy CP1 outlines that all applications for major developments should include proposals for "safe, direct and attractive walking and cycling routes that link to existing networks".
529	4504	Mr Geoff Kurnatowski [529]	Tendring is an area with many rural villages. Many of these villages, such as Wrabness, have narrow, winding country roads which are often quite dangerous to walk or cycle along because of the speed at which traffic proceeds, including around blind corners. In the last 10 years in Wrabness there have been many cases of cars running off the road and ending up in hedges and fields. More housing in these villages will make the problem even worse. The only way for Wrabness primary age pupils to attend schools is by car. The public transport network is very poor.	Comment	Concerns with regard to road safety are noted. Whilst the Council acknowledges many roads, particularly those in rural villages, are narrow and winding, the Local Plan seeks to provide safer connecting routes throughout the District. Policy SPL3 sets out that all new development must ensure access to the site is safe and practicable, Similarly, Policy HP1 states that developments are required to prioritise walking, wheeling, cycling, and access to public transport, in line with Policy CP1. This criteria ensures that residents have safe and efficient transport networks and access to active travel methods.
1510	13821	Julie and Trevor Cottee [1510]	If the aim is to be able to walk or cycle everywhere, how is this aim going to be achievable with shops 2-4 miles away. There are no cycle paths, the road is a busy congested B -road, constantly busy with heavy traffic 18 hours per day. Heavy lorries, buses. Coaches and emergency transport speed along Thorpe Road. Summer- time brings queues that spread from Frinton gates to the edge of Kirby cross. Transport infrastructure can only mean buses will be rerouted to the new potential development. Sewage systems currently do not cope with the current amount of homes in Thorpe Road, many needing their own pumping stations, how will extra homes putting extra capacity on the foul water system be managed? How will our water quality be safeguarded?	Comment	The Council supports both active travel as well as public transportation. It is understood that residents may not want to walk or cycle long distances to get to every-day services. Policy CP1 and Policy HP1 both encourage new developments to prioritise active travel networks and public transportation to tackle climate change as well as to give residents safer and healthier travel choices. The Council acknowledges concerns surrounding transportation and infrastructure. Transport modelling and the Infrastructure Delivery Plan (IDP) have recently been updated in support of the Regulation 19 version of the Local Plan. These studies will better inform development and the infrastructure required to support an increase in house building. In the interim, the Council will continue to work with Essex Highways and the relevant infrastructure providers to ensure developments are supported with adequate infrastructure provisions. The Council will also be working with the relevant infrastructure providers to address concerns relating to sewage. The updated IDP will help in understanding capacity at water facilities throughout the District, as well.

1498	14190	Lee Smith [1498]	Tendring is currently facing the largest infrastructure proposals in its history: National Grid, Five Estuaries, North Falls and Tarchon are all proposing massive new developments in the form of substations, pylons, underground cabling, access roads and compounds. The scale and impact of these proposals is unprecedented. Any Local Plan review undertaken before the outcomes of these Nationally Significant Infrastructure Projects are known is inherently flawed. It cannot meaningfully assess cumulative impacts, infrastructure capacity, landscape harm or spatial strategy. Proceeding now risks producing a Local Plan that is unsound on the grounds of prematurity, inadequate evidence, and failure to consider reasonable alternatives.	Comment	The Council is aware of the range of Nationally Significant Infrastructure Projects (NSIPs) affecting the District, all of which are at different stages of development. It recognises that this is a dynamic and evolving situation, with projects such as the Norwich to Tilbury transmission line, North Falls, Five Estuaries and the Tarchon Interconnector progressing through pre-Development Consent Order (DCO) and DCO stages and forming part of nationally important infrastructure delivery. The Council will continue to balance the need to meet Government requirements for housing, employment and supporting infrastructure with the requirements and potential impacts of these NSIPs. It is actively engaging with project promoters and relevant stakeholders to ensure a coordinated and constructive approach. The Local Plan is intended to be sufficiently flexible to respond to the progression of NSIPs. Site allocations, including those referenced in the representation, are capable of coming forward alongside nationally significant infrastructure, taking into account the stage of the relevant DCO process. More detailed matters relating to site-specific impacts and interactions will be addressed through subsequent Development Plan Documents (DPDs), the development management process, and, where relevant, the DCO regime. This approach ensures that the Plan remains effective, deliverable, and consistent with national policy, while retaining the ability to respond to the evolving NSIP programme.
1457	14532	Mrs Fiona Gee [1457]	I am concerned that in the rush to comply with government demands for housing, that the knock on effects on wildlife, infrastructure, green spaces , heritage buildings (which will suffer with more traffic on the roads) and safety, have not been duly considered and planned for , to mitigate the detrimental effects.	Comment	Concerns with regard to local character and the local environment are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. That being said, the Local Plan contains policies within Chapter 7 to protect local wildlife, green space, and heritage. With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.

Objective 4: Infrastructure Provision

Summary of Representations

Several representations submitted for Objective 4 had suggestions for the wording and content of the text. Sport England suggested the objective go beyond the scope of Public Health to include a range of partners that contribute towards infrastructure aspirations. Essex County Council made suggestions to include bullet points which require the safeguarding and delivery of LCWIP corridors, bus priority/rapid transit-ready corridors, and mobility hubs. Essex Police suggested additions to the objective which would highlight the need for infrastructure to support police, fire, & rescue services. General support for the Objective was given by businesses/landowners/developers, as well as community representatives. Members of the public had greater objections to Objective 4. Representations outlined concerns with regard to infrastructure phasing, capacity, and binding delivery mechanisms. Others expressed dismay over the local landscape and the potential increase in flood risk due to development on greenfield land. A representation was also made which highlighted the scale and impact of Nationally Significant Infrastructure Projects (NSIPs) planned for in the District and argued the Local Plan should not go forward until the outcome of such proposals is assessed. More generally, members of the public stated infrastructure facilities are already in need of improvements and worry that increased development could lead to greater capacity issues.

In response, Objective 4 has been amended to include specific reference to the safeguarding of existing transport infrastructure. Though text does not explicitly reference police, fire & rescue services, these services are included under the term of ‘infrastructure 'within Objective 4. Wording is retained which stresses the importance of adequate infrastructure phasing and delivery to support development.

Objective 5: Education and Health

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
349	4286	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	This is a very encouraging statement and the ICB is very supportive of the intentions of the local plan. The ICB will continue to work with Tendring District Council to promote healthier and active lifestyles and to begin to implement the NHS 10-Year Plan. Working with emergency services should include provision of sufficient infrastructure for those emergency services, supported by s106 funding.	Support	Support for Objective 5 is noted. The Council will continue working with the ICB to promote healthy, vibrant communities throughout the District. The Council has updated its Infrastructure Delivery Plan, which will include up-to-date data on what infrastructure will be required to support emergency services in the District. This will include data on what emergency services and facilities to support such facilities are needed.
166	6798	Essex Fire (Essex Fire) [166]	As populations increase, including households with school aged children, further youth engagement in localities is required to establish risk awareness to help prevent fires and other incidents, including emergencies, which helps to build safer communities	Comment	The Council agrees that youth engagement to establish risk awareness and prevent fires is important in localities. The Council will continue to work with Essex Fire and emergency services to promote these programmes.
Businesses, Landowners and Developers					
136	4354	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	ditto for Objective 1	Support	Noted.
Community Representatives					
799	3807	Frating Parish Council (Cllr Paula Bland) [799]	All existing local primary schools are over subscribed. There is no existing primary or secondary school within walking/cycling distance of the proposed development which WILL result in parents using private cars to take their children to school. While there is an intention to build schools these must be part of the initial infrastructure and not an afterthought. There is only the one hospital serving all the residents of Tendring and Colchester, which is already under resourced and over subscribed. Access to the hospital is difficult with lack of parking.	Comment	The Council acknowledges concerns regarding education provision in the District. The Council is actively working with partners at Essex County Council to ensure that the adequate infrastructure can be provided alongside development. This will be informed by the updated Infrastructure Delivery Plan, which will use an evidence-based methodology to inform decisions with regard to infrastructure provision.
791	3706	Sport England (Mr Roy Warren, Planning Manager) [791]	Specific support is offered for strategic objective 4 as this would support the promotion of active travel opportunities in new development which in turn would encourage physical activity. Promoting and encouraging healthy lifestyles through developments and planning is welcomed in Objective 5 as this would accord with Government policy in paragraph 96(c) of the NPPF and Sport England's 'Uniting the Movement' Strategy https://www.sportengland.org/about-us/uniting-movement. However, it is requested that the scope of the objective is extended to beyond Public Health as a range of partners will be involved in achieving this objective. This is exemplified by the Essex Local Delivery Pilot initiatives in Tendring district that are focused on encouraging active lifestyles which involve a range of partners including the NHS, Active Essex and the local voluntary sector as well as the local authorities (including ECC Public Health).	Comment	These suggestions are noted and will be taken forward in the updated Local Plan.
953	3464	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The

					suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
Members of the Public					
580	3570	Mrs Caroline Mitchell [580]	This looks to be a positive approach.	Support	Noted.
988	3621	Mrs Carla Leonard-Wrigjt [988]	Beaumont - destroying the landscape and peoples views from their homes does not support to create peoples emotional wellbeing or mental health, these ill thought out decisions on the location which gravelly affect people's day to day life do not support integration of new houses, they do not compensate home owners for the devaluation of their properties. They go against village lifestyle choices and why people chose to buy their home. This creates unsettlement and upheaval with locals wishing to leave and then the difficulty of selling their homes at a reduced cost!	Object	This representation is noted. The Council understands that these developments can have significant impacts on residents and the local area. However, the Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
1032	3660	Ms Jacquie Wilkes [1032]	With bigger towns proposed there is a need for more localised policing and leisure services	Comment	The Council has updated its Infrastructure Delivery Plan, which will provide data with regard to the infrastructure needed to support development. This includes data concerning police and leisure services. The Council will continue to work with the relevant partners on these matters.
1034	3664	Mr Dean Garwood [1034]	TDC planning seem to ignore the issues concerning the lack of adequate Doctor and Dentist availability in the Clacton, Frinton and Walton districts when considering planning for endless home building in these areas. I remember the application at Willow Farm in Halstead Road, Kirby Cross which included the provision of a new Doctors Surgery and a Community Centre. Once approval was granted, the developer dropped those elements of their plan and adjusted it to add yet more housing. Gary Guiver claims that there was no NHS appetite for the Surgery, I'd like to see the evidence of the Tender process.	Object	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1047	3685	Mr Connor Morris [1047]	Unless you’re funding a new doctors and building a new school, there’s simply not enough support for the families moving in to the proposed houses.	Object	Concerns regarding GP services and education locally are noted. The Council is currently working with partners at the ICB/NHS and Essex County Council to ensure the adequate medical needs are planned for and met in the District. In addition to this, the Council has updated its Infrastructure Delivery Plan, which will inform the Council on the types of infrastructure needed to support new development.
1030	3697	Mr Paul Lewis [1030]	Fully support this proposal for education and health, especially if it ultimately leads to new opportunities for local people.	Support	Noted.
1059	3726	Mr Matthew Sutton [1059]	I support this objective but object to the gap between aspiration and delivery. The Frinton-on-Sea, Walton and Kirby Cross area has absorbed a decade of residential growth with no new GP surgery opened. A further 420 dwellings are proposed at Kirby Cross. No specific healthcare commitment exists for this area equivalent to those made for Clacton and Harwich. Site policies refer only generically to contributions that "may include education provision" - non-binding language. Objective 5 must be backed by location-specific, upfront infrastructure commitments, not post-permission negotiation.	Object	Concerns regarding GP services and education locally are noted. The Council is currently working with partners at the ICB/NHS and Essex County Council to ensure the adequate medical needs are planned for and met in the District. In addition to this, the Council has updated its Infrastructure Delivery Plan, which will inform the Council on the types of infrastructure needed to support new development. Whilst Objective 5 does not include specific policy wording, greater detail with regard to health services can be found in Chapter 4 of the Local Plan.
1064	3765	Mrs Elizabeth Sadler [1064]	There are NO school places in the town . There is only ONE overworked and oversubscribed GP surgery,where appointments are like gold dust. There are NO NHS dentists . Promises about more medical facilities have been made in the past ,but were unfulfilled. Where houses were built ,they manage to always build just	Comment	Concerns regarding GP services and education locally are noted. The Council is currently working with partners at the ICB/NHS and Essex County Council to ensure the adequate medical needs are planned for and met in the District. In addition to this, the Council has updated its Infrastructure

			under the number required for another surgery. DON'T make promise you can't fulfill !!!		Delivery Plan, which will inform the Council on the types of infrastructure needed to support new development.
752	3797	Mr Christopher Walpole [752]	Both Colchester and Clacton hospitals are unable to currently cope with current population levels with deteriating services experienced in recent years at both sites , the planned population levels would require another hospital to be built as it is likely Colchester and Clacton health facilities would experience a complete meltdown . Schools in the area area already experiencing maximum capacity scenarios , certainly further education facilities would be required in order to cope with what is likely to be a huge increase in school age children in the area but planned as part of the initial infrastructure planning process	Object	Concerns regarding GP services and education locally are noted. The Council is currently working with partners at the ICB/NHS and Essex County Council to ensure the adequate medical needs are planned for and met in the District. In addition to this, the Council has updated its Infrastructure Delivery Plan, which will inform the Council on the types of infrastructure needed to support new development.
1148	3864	Mr David Green [1148]	Our surgery in Brightlingsea just about copes most of the time with a fairly good service. Our pharmacy struggles to maintain a good service and with many people using on line services their viability is in doubt. Requests for a second pharmacy were refused so this influx will place too much pressure on existing services. Similarly with education. The regular flow of buses and cars bringing children into town coupled with new residents will only be detrimental to the town. Police in town are virtually invisible so a large increase in population is likely to result in more crime.	Object	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would also decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. However, the Council will continue to work with the relevant partners and infrastructure providers to ensure educational and emergency service needs are met.
1107	3882	Mr Philippe Whyte [1107]	This would be very nice if you can do it, I doubt you will be able to, for instance, magic up a busload of GPs	Comment	Concerns regarding GP services locally are noted. The Council is currently working with partners at the ICB/NHS to ensure the adequate medical needs are met in the District.
616	3893	Mr Kevin Everitt [616]	For Weeley, build the new school on the Rose Thorpe road site and close the old school. use this site for development as part of a proper plan including the Gutteridge Hall Lane area with proper homes and services. For Health, developers buying off any responsibility does not increase NHS services in the area, proper planing with the NHS is required, we have insufficient Doctors and Dentist covering Weeley & Weeley Heath.	Comment	Concerns regarding GP services and education locally are noted. The Council is currently working with partners at the ICB/NHS and Essex County Council to ensure the adequate medical needs are planned for and met in the District. In addition to this, the Council has updated its Infrastructure Delivery Plan, which will inform the Council on the types of infrastructure needed to support new development.
1315	3930	Mrs Kellie Tynan [1315]	With one doctors surgery and one pharmacy in Brightlingsea it can be very difficult to get an appointment at the local surgery. Given the demographics of the town the surgery has to support a lot of elderly people there is just not enough capacity to meet the needs of all. Building new homes will mean the likeliness of getting an appointment will become even more scarce. The pharmacy work really hard but again the volume of people that need to collect prescriptions can mean you have to wait more than 30 minutes to be seen and collect	Object	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would also decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment.

					However, the Council will continue to work with the relevant partners and infrastructure providers to ensure medical needs are met.
1352	4036	Mrs Paula Bland [1352]	Clacton Hospital is just for outpatient services and some in care for the elderly. Colchester Hospital which is the closest A&E, maternity unit, cancer unit etc etc is over run with patients and severely underfunded. Access to it is a nightmare as is parking. There is no room onsite for expansion. The city of Colchester is expanding at a rate of knots and Colchester Hospital is totally under resourced to cope with the level of building that central government demand of us.	Comment	Concerns regarding GP services locally are noted. The Council is currently working with partners at the ICB/NHS to ensure the adequate medical needs are met in the District.
581	4047	Mrs Sally Webb [581]	The hospital provision for Tendring has diminished over the years and so one is very reliant on Colchester Hospital - which cannot cope with the existing demand. No new monies have been allocated to Essex Police - see their latest statement which accompanied the Household Rates Accounts, ambulances cannot cope as they have to queue to at hospitals to deliver patients, if they have to queue with patients they will not be able to respond better without funding and flow rates in hospitals.	Comment	The Council is working with Essex County Council, the NHS/ICB, and the relevant partners to ensure development is supporting with the adequate infrastructure. The Infrastructure Delivery Plan has been updated, which will provide data on where infrastructure is needed and what types of facilities are required to support development.
1376	4210	Mrs Anja Newman [1376]	GPs & NHS dentists are already full. Whilst some schools have a few spaces, many parents need to drive their children to school as they do not live close enough to walk and/or there is no bus. Again, adding to traffic burden.	Comment	The Council is working with Essex County Council and the relevant partners to ensure development is supporting with the adequate infrastructure. The Infrastructure Delivery Plan has been updated to provide data on where infrastructure is needed and what types of facilities are required. In response to concerns of routes to schools, Policy CP1 encourages planning applications to include proposals for safe, direct, and attracting walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces. Please see Chapter 8 of the Local Plan for more information.
1383	4227	Mrs Joanna Thornicroft [1383]	The proposed development in Wrabness is not supported by sustainable travel opportunities. There is no bus route. The trains run sporadically. And you take your life in your hands if you cycle the country roads. There is no proposal to bring back a bus route in the proposals, and I would think that would be compulsory as otherwise this is just a negative climate impact proposal	Comment	Policy CP1 encourages planning applications to include proposals for safe, direct, and attracting walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces. Please see Chapter 8 of the Local Plan for more information.
1391	4258	Mrs Laurence Dewey [1391]	It goes without saying that new services such as new schools and additional medical provision would be essential. Who would be accountable if these were not delivered to match the additional population ? The report does not mention this.	Comment	Concerns with regard to health and education infrastructure are noted. The Council has recently updated its Infrastructure Delivery Plan (IDP), a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as the NHS/ICB, Essex County Council and the relevant infrastructure providers to ensure growth is supported. Policies within this local plan seek to secure relevant developer contributions towards infrastructure delivery in accordance with the Infrastructure Delivery Plan, and associated Evidence Base. Developers will be required to enter into legal agreements, in order to ensure

					appropriate infrastructure is provided at the right time, and these provisions will remain in place following Local Government Reorganisation.
1214	4340	Mr John Beasley [1214]	Objection to SAH4. I find adding to the already strained medical facilities in Brightlingsea with another possible 300 dwellings very frustrating without making significant capacity to it. The Colne medical centre, (the only GP practice for nearly 9000 residents) cope really well, but getting an appointment can take over a week. This is by no means the fault of the staff or the practice itself but testament to capacity issues. So too is true of the boots pharmacy (the only one in the town). Collecting a pre ordered prescription can mean waiting around for some 40 minutes.	Comment	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. However, the Council will continue to work with the relevant partners and infrastructure providers to ensure educational and medical needs are met.
571	4407	Mrs Sian Savage [571]	Adequate consideration should be given to the capacity of the Local GP surgery and the chemist in Brightlingsea in relation to new development. Plans to increase GP and chemist capacity in the town should be put in place with the introduction of new homes. Concerns about pressure on local GP surgery and chemist featured highly in the findings of the Neighbourhood Plan community consultation.	Comment	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. However, the Council will continue to work with the relevant partners and infrastructure providers to ensure educational and medical needs are met.
1510	13822	Julie and Trevor Cottee [1510]	Aim to provide good quality education plans. How will this be provided with the current primary and senior schools overflowing?	Comment	The Council is working with Essex County Council and the relevant partners to ensure development is supporting with the adequate infrastructure. The Infrastructure Delivery Plan has been updated to provide data on where infrastructure is needed and what types of facilities are required.

Objective 5: Education and Health

Summary of Representations

General support for Objective 5 was given by technical stakeholders and businesses/landowners/developers. The Suffolk and North East Essex ICB (NHS) suggested the text reference the infrastructure needed to support emergency services as well as the developer contributions to support the funding of such facilities. Essex fire emphasised the need for youth engagement to establish risk awareness to prevent fires and other incidents. Community representatives and members of the public mainly voiced concerns with regard to the capacity of health and educational services and staff. Many representations stressed the need for upfront infrastructure commitments to support development and to ensure population growth is met with the adequate infrastructure.

In response, Objective 5 has been updated to reference the NHS and neighbouring local authorities as partners to collaborate with to promote and encourage healthy lifestyles. The Council continues the acknowledge the importance of engagement with emergency services within the Objective's wording. For more information on how the Council intends to address health concerns in the District, please see Chapter 4 of the Local Plan.

Objective 6: Sustainability

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
1654	6675	Natural England (Jonathan Burt) [1654]	Support the emphasis in Section 6.53 and Strategic Policies PP6 and PP7 on regenerating suitable brownfield sites, provided they are not of high environmental value. Recommend adding a requirement to prioritise brownfield or low-value sites and protect best and most versatile agricultural land within Objective 6 (Sustainability).	Support	This suggestion is noted and has been taken forward in the updated Local Plan.
166	14527	Essex Fire (Essex Fire) [166]	In addition, in order to support the creation of strong, healthy and vibrant places, and achieve sustainable development, it is necessary for an appropriate level of community safety, cohesion and engagement to be provided, including Prevention and Protection activities in line with the ECFRS Community Risk Management Plan 2025-2030.	Comment	The Council agrees that community safety, cohesion, and engagement are important; this is reflected in Objective 5 of the Local Plan.
Businesses, Landowners and Developers					
136	4356	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	ditto for Objective 1	Support	Noted.
Community Representatives					
258	13595	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	'Locate development to satisfy their needs for employment, shopping education and other services. Which minimise the need to travel'. We wish to add a strong comment on sustainability with regards to the fact, most traffic from the Town Council area must pass through Thorpe-le-Soken high street. Collectively sites SAH2, SAH3, SAH11, MSA2, MSA32, MSA13, MSA14, MSA18, MSA17 all add some 860 properties to the east of Thorpe le Soken High Street. Thorpe-le-Soken has serious traffic capacity issues, acknowledged by the planning inspectorate, and to accommodate this level of expansion would need alternative routes developed to solve that overcapacity issue. This council believes that without this capacity issue being addressed the housing allocation may result in danger to other road users and will cause increasingly long queues through Thorpe badly affecting businesses in Frinton, Walton, the Kirbys and Great Holland particularly in summer months when the tourist season is at its peak. Regarding sustainability, Tourist businesses to the east of Thorpe-le-Soken are increasingly being hampered by traffic being throttled in Thorpe high street. The Town Council area relies on tourism, particularly during the summer months for their income. Without this income the area will stagnate and die. A by-pass or alternative route around Thorpe-le-Soken is increasingly necessary now (hence refusal by planning inspectorate of a development off station road in Thorpe) but	Support	Concerns with regard to transport and traffic are acknowledged by the Council. The Council is working with Essex Highways and other relevant partners to ensure the adequate transportation is planned for alongside developments near Thorpe-le-Soken. The Council is also in the process of updating its transport modelling, which will provide data to support transport planning throughout the District. Other policies are in place to support alternative modes of travel, such as public transportation, walking and cycling, in Chapter 8 of the Local Plan. The Council understands the importance of providing adequate transport provisions for both local residents and tourists locally and, therefore, seeks to address concerns through the above policies and actions. It is acknowledged that smaller allocations do not have sustainable transportation plans imbedded in a DPD, such as Garden Villages do. However, the Council will continue to promote sustainable/active travel throughout the District and within existing settlements.

			with 860 houses being planned to the east of Thorpe high street unacceptable congestion will occur. Consideration of an alternative route around the village is seen as a prerequisite to making both the proposed and future development to the east sustainable. Large – scale planned communities offer the best opportunity to incorporate sustainable transport hubs and infrastructure which will significantly cut the volume of new traffic creation compared to dispersed smaller developments		
799	3808	Frating Parish Council (Cllr Paula Bland) [799]	This will be a new garden community where is no existing employment, shopping, education, and other services locally including any public transport. Without building these facilities into the community from the outset the residents will rely on the private car.	Comment	The Garden Community and Garden Villages will all have DPDs which will plan public transportation from the outset of development. TCBGC's rapid transit system is already underway, and modelling for public transportation in the Garden Villages is being updated through the Council's transport modelling. The Council will continue to work with Essex County Council and other relevant partners to ensure that plans for public transportation are carried out alongside the development within larger allocations.
953	3465	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
Members of the Public					
969	3574	Mr Scott Gilmour [969]	Due to the lack of space to increase road capacity within urban areas in Tendring, maximising opportunities for active and sustainable travel is highly desirable. As the population grows, if nothing is done there will inevitably be increased congestion, not only causing inconvenience for new residents, but bring pollution and noise to existing ones. Small things are possible, such as improving quality of bus stops, implementing bus gates and integrating public transport schedules and fares. Widening and converting paths into shared use, allowing contraflow bike lanes etc. expands the options for active travel and will gradually create a comprehensive network.	Support	Support for this objective is noted. The Council agrees that public transportation and active travel are important to implement throughout the District. Policy CP1 encourages planning applications to include proposals for safe, direct, and attracting walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces. Please see Chapter 8 of the Local Plan for greater detail.
988	3622	Mrs Carla Leonard-Wrigjt [988]	Beaumont - 20 houses in a rural isolated village location on top of a hill on an incredibly busy road with minimal transport services - will not minimalise the use of cars! It will increase greatly and already overwhelmed country road! It will not satisfy their need for employment unless working from home, online shopping, home education or online learning - people will be more isolated with greater need to travel!	Object	Concerns relating to public transportation and sustainability are noted. Though the Council accepts that housing developments in smaller rural villages are generally less sustainable than sites allocated within or around towns and villages, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. This approach also contributes to the Council meeting the expectation that at least 10% of the housing requirements should be accommodated on sites of one hectare or less, as set out in national planning policy. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging

					LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
989	3630	Mr Lewis Leonard-Wright [989]	Beaumont - 20 houses in a rural isolated village location on top of a hill on an incredibly busy road with minimal transport services - will not minimise the use of cars! It will increase greatly and already overwhelmed country road! It will not satisfy their need for employment unless working from home, online shopping, home education or online learning - people will be more isolated with greater need to travel! Even to access the train station a car is needed due to bus timetables!	Object	Concerns relating to public transportation and sustainability are noted. Though the Council accepts that housing developments in smaller rural villages are generally less sustainable than sites allocated within or around towns and villages, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. This approach also contributes to the Council meeting the expectation that at least 10% of the housing requirements should be accommodated on sites of one hectare or less, as set out in national planning policy. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
580	3673	Mrs Caroline Mitchell [580]	Modern life will inevitably mean people will need to travel to access employment, services and social passtimes. Local roads (many already in poor state of repair) will inevitably be under pressure, meaning surrounding towns and villages like Manningtree and Bradfield will suffer as people use local roads as cut thorughs and access. What measures will be taken to address this.	Comment	Concerns with regard to traffic congestion and road safety are acknowledged. The Council understands that there is a need to adequately plan infrastructure to accommodate the additional development in the District. The Infrastructure Delivery Plan (IDP) and transport modelling have recently been updated to give guidance as to where roads and facilities are needed to support an increase in housing and population. The Local Plan also supports alternative methods of travel, such as public transportation and active travel. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
1030	3698	Mr Paul Lewis [1030]	Sustainability. As I have previously mentioned I do not believe the majority of properties being proposed would be purchased by people that work locally. They would be commuter homes for workers in the capital or other major towns such as Ipswich for example. This means already congested road and rail links at busy times will only get worse. I concur that education, retail, employment and other services will be needed but somehow no mention of new leisure facilities or dedicated community services are mentioned.	Object	Concerns with regard to traffic congestion and road safety are acknowledged. The Council understands that there is a need to adequately plan infrastructure to accommodate the additional development in the District. The Infrastructure Delivery Plan (IDP) and transport modelling have recently been updated to give guidance as to where roads and facilities are needed to support an increase in housing and population. The Local Plan also supports alternative methods of travel, such as public transportation and active travel. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and

					emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces. The terms “facilities” and “leisure” have been added to the first paragraph of Objective 6 to reflect the suggestion.
1064	3766	Mrs Elizabeth Sadler [1064]	There are very few opportunities for employment because there are very few retail shops and no businesses or industry; it is a poor area full of people on benefit and wanting social housing . They CAN'T afford to buy houses ;those sort of people just don't come here ;they go to Dorset/Somerset/Sussex /Kent. BUILD THE HOUSES THERE ;NO ONE CAN AFFORD THEM HERE. People have been moved here from London boroughs and sadly they arrive with all their problems. Drug dealing has become an issue. Buses are unreliable and infrequent.	Comment	Concerns with regard to the increase in housing numbers and local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Local Plan also supports alternative methods of travel, such as public transportation and active travel. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council’s emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces. The Council will continue to work with the relevant partners, such as Essex Highways, to ensure that roads and other forms of infrastructure are secured alongside housing.
1148	3865	Mr David Green [1148]	One road in and out! Unreliable bus services mean that most people use cars for work, shopping and recreation. This will not improve after several hundred people move in but will get much worse. Try leaving the town by road in the mornings or coming home in the evening. Very few of the new influx will stay in town for work o pressure on our one road will escalate. Any accident or breakdown paralyses the town. Dont make it worse!	Object	Concerns with regard to the increase in housing numbers and local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Local Plan also supports alternative methods of travel, such as public transportation and active travel. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council’s emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces. The Council will continue to work with the relevant partners, such as Essex Highways, to ensure that roads and other forms of infrastructure are secured alongside housing.

1107	3883	Mr Philippe Whyte [1107]	15 minute city, imprisoning people in their immediate locality	Object	The Council seeks to create sustainable developments with the adequate facilities and services to support residents. It is important to note the Council is not promoting 15-minute cities within the Local Plan.
616	3894	Mr Kevin Everitt [616]	To provide opportunities for the local populace to enjoy improved shopping, education and other services, you must start with the existing deprived and run down areas and invest in them directly.	Comment	The Council has targeted regeneration schemes in the more deprived areas of the District, such as Jaywick Sands. In general, the Local Plan aims to support and diversify the economy across the district while maintaining a broad balance between homes and jobs. Please see Policies PP6 and PP7 for more information.
1351	4003	Tom Moat [1351]	Active travel and public transport are important but specific mention of ambitious targets for sustainable building materials and heating infrastructure should be made here if not included elsewhere.	Comment	The Council agrees that sustainable construction is important and has included policy on related topics within Policy SPL3.
1352	4035	Mrs Paula Bland [1352]	With the demise of the town centre, this will mean more out of town retail parks with the same stores as can be found across the country (nothing different or imaginative). Residents do not and will not use public transport to reach these. It's unrealistic to think that anyone will do their weekly shop or buy their new garden furniture/plants etc using public transport. With shift work and a considerable amount of part time working hours the public transport will have to be significantly improved and I state again that these services must be in place from the start.	Comment	The Council acknowledges the Local Plan has limitations with regard to residents' travel choices and behaviour. However, there are policies in place to encourage residents to transition from car dependent travel to active travel methods. One example is the inclusion of Policy CP1 within the Local Plan, which outlines that all applications for major developments should include proposals for "safe, direct and attractive walking and cycling routes that link to existing networks". Garden Villages will also seek to provide suitable active travel routes, alongside rapid public transport systems and connections. With these provisions in place, residents will have increased transportation options which differ from car-dependent transportation. With regard to town centre improvements, the Local Plan aims to support and diversify the economy across the district while maintaining a broad balance between homes and jobs. Please see Policies PP6 and PP7 for more information.
581	4060	Mrs Sally Webb [581]	Horsley cross garden village site is totally unsuitable, it will add pressure to an already crowded road, it will disrupt travel from Lawford on the A137 where more housing is already planned. Mistley developments are already causing traffic to run through Bradfield to get onto the A137 which will result in massive extra traffic. Housing at Horsley Cross will need access to Manningtree station, already the car parking is full at 8.30am; there are no busses which service the station at this moment in time to take over 1300 passengers to london daily. Horsley Cross is not viable.	Comment	Concerns with regard to the Horsley Cross development are understood, particularly as it relates to transport. The Council has updated its Infrastructure Delivery Plan and its transport modelling, which will better inform on where infrastructure, such as roads and transportation, is needed and what types are required to support growth in the District. The Council will continue to work with the relevant partners, such as Essex Highways, to ensure that roads and other forms of infrastructure are secured alongside housing.
1376	4212	Mrs Anja Newman [1376]	Rural bus services insufficient to support minimising car travel. Student bus passes to get to the Colchester sixth form college is £170/month or using the price cap (2ways x £3 x 5days/week) £30/week. Option for cost effective rapid transit along A120 with bike parks to get to the park & ride?	Comment	The Council is working to improve public transportation through the District. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces. The Council has also updated its Infrastructure Delivery Plan and its transport modelling, which will better inform on where infrastructure, such as roads and transportation, is needed and what types are required to

					support growth in the District. The Council will continue to work with the relevant infrastructure providers, such as Essex Highways, to ensure that roads and other infrastructure types are delivered alongside housing.
1383	4229	Mrs Joanna Thornicroft [1383]	Totally disagree with the proposal at Wrabness. There are no schools, no GP services and no employment opportunities. Combined with a limited train service to a handful of locations. You will hit planning target but miss everything else around sustainability and employment. In addition it will have a negative affect in wildlife in an area that is specifically recognised with AONB and SSSI status. You absolutely maximise the need for travel whilst building in this small rural community	Object	Concerns regarding GP services and education locally are noted. The Council is currently working with partners at the ICB/NHS and Essex County Council to ensure the adequate medical needs are planned for and met in the District. In addition to this, the Council has updated Infrastructure Delivery Plan, which will inform on where infrastructure is needed and what types of facilities needed to be delivered alongside development. The Council is working to improve public transportation through the District as well. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces. With regard to the local environment, the Local Plan includes policies, such as PPL4, which protect biodiversity and the rural landscape in Tendring. Please see Chapter 7 for more detail.
1382	4237	Ms Tamasin Davies [1382]	A worthy aim to minimise travel by car - but in Wrabness there is little opportunity for employment, no school or doctor and a little shop run by volunteers. Residents will use cars for all of these things as there is no bus service. Trains run only once an hour to Manningtree (with a long walk to the town centre) and Harwich where the supermarkets are a long walk from any of the stations.	Comment	Concerns relating to public transportation and sustainability are noted. Though Officers accept that housing developments in smaller rural villages are generally less sustainable than sites allocated within or around towns and villages, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. This approach also contributes to the Council meeting the expectation that at least 10% of the housing requirements should be accommodated on sites of one hectare or less, as set out in national planning policy. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
1391	4259	Mrs Laurence Dewey [1391]	Not having to travel far for work and having access to adequate public transport would be a major achievement. Looking at the reality of most people's' life, it seems mainly utopia.	Support	Support is noted. The Council is working to support active travel and public transportation methods in the District. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.

					The Council will also continue to work with the relevant infrastructure providers and partners to ensure that development is supported by the adequate transportation methods.
529	4478	Mr Geoff Kurnatowski [529]	The plans for new housing in some of the villages will cause problems for the small local schools, many of which are already nearly full. The plans for new housing in Wrabness, Wix and Bradfield will be particularly problematic. Both schools are already over subscribed, and consequently parents will need to travel some distance by car to find alternatives.	Comment	Concerns regarding education locally are noted. The Council is currently working with partners at the ICB/NHS and Essex County Council to ensure the adequate medical needs are planned for and met in the District. In addition to this, the Council has updated its Infrastructure Delivery Plan, which will inform on where infrastructure is needed alongside development. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
1510	13823	Julie and Trevor Cottee [1510]	The aim is it that services will be provided locally and or in locations which minimise the need to travel as modes of transport will be provided to maximise opportunities for active and sustainable travel and minimise car travel. How ever is this going to work?	Comment	The Local Plan seeks to support development with active travel and public transportation methods, so that residents have multiple options for movement within the District. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
1150	14385	Luke Tyrrell [1150]	Sustainability. Local funds.	Comment	Noted.

Objective 6: Sustainability

Summary of Representations

Overarching support for Objective 6 is given by technical stakeholders, businesses/landowners/developers, and community representatives. Natural England suggested the text include a requirement to prioritise brownfield sites. Essex Fire noted that sustainable development must be met with the appropriate level of community safety, cohesion and engagement in line with the ECFRS Community Risk management Plan 2025-2030. Though Frinton & Walton Town Council noted support for the objective, they comment that the additional development in the area will lead to overall capacity issues, and therefore, will hinder tourism opportunities which benefit the local economy. Frating Parish Council argues that the Garden Communities will result in car dependence if not met with the adequate facilities locally. Members of the public had greater objections to Objective 6. Many emphasise the need for active travel routes and public transportation locally. Other respondents noted concerns with regard to traffic and infrastructure capacity following the proposed development. One representation suggested a reference to new leisure facilities and community services within the objective. Other concerns include housing affordability, unemployment, environmental consequences, and viability.

In response, the objective has been updated to include references to brownfield and agricultural land. Additional wording with regard to sustainable design has been added to the end of the objective. 'Leisure' has been added to the beginning of Objective 6. It should be noted that community safety, cohesion, and engagement are topics addressed in Objective 5. Active travel continues to be included within the text, as well as infrastructure facilities and services.

Objective 7: The Historic Environment

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
358	13557	Historic England (Andrew Marsh, Historic Environment Planning Adviser) [358]	In preparation of the forthcoming Local Plan review, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups. Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.	Comment	Noted. The Council will continue to work with the relevant partners when relevant to heritage matters.
Businesses, Landowners and Developers					
136	4358	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	ditto as before	Support	Noted.
Community Representatives					
953	3466	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
799	3809	Frating Parish Council (Cllr Paula Bland) [799]	We are all small independent villages. This development will urbanise the area and create a 'new town'. While there are no historic buildings the area consists of grade 1 and 2 agricultural land much of which will be lost at a time when the country needs to be able to feed the population. This is in addition to the land that will be lost with the development of the electricity sub station at Little Bromley and the trenches being dug for the power cables coming in from the North Sea.	Comment	The Council acknowledges concerns about landscape character. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure.
1110	3818	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and	We support the strategic objectives for the Historic Environment, and we will be recommending the inclusion of Lawford Tye Field, between School Lane Playing Field and Grange Road, where in her reasons for dismissing an Appeal the Planning Inspector gave some weight to the importance of a Scheduled Ancient Monument (SAM) on site	Support	The comments here are noted and it is considered that further protection of this site could be allowed by the Council by the designation of Safeguarded Open Space. It is recognised that the space is used informally as public open space and the land adjacent is also protected by this same designation.

		Parish Councillor) [1110]			
Members of the Public					
970	3559	Ms Bonnie Green [970]	Re the proposed build at Kirby cross towards Kirby Le Soken. My house was built in 1500- 1550, the council has built and built around it over the years, it's now almost lost in a sea of new builds, which has caused massive increase in traffic on the road. My windows and walls rattle with trucks through the night. Another 4000- 600 dwellings 2 minutes from my homes will be unbearable. My little house is drowning and so are others nearby. Our community is almost lost and any historic aspects are being overshadowed and hidden, the historic environment GONE.	Object	This representation is noted. The Council understands that these developments may have significant impacts on residents locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the historic environment. The Local Plan retains policies with regard to the historic environment, which can be found in Chapter 7.
969	3575	Mr Scott Gilmour [969]	Conserving and enhancing the historic environment is a great objective. There are plenty of areas that would benefit from enhancement. So long as harm is restricted, development that seeks to alter relevant views and setting in a beneficial or complimentary way should be encouraged if it benefits other objectives. For example, surface car parks within the historical town centres could be converted into mixed use commercial and residential properties, built to reflect the surrounding architecture and allow more residents to live in the heart of those towns, close to transit with the ability to walk to amenities.	Support	Support for this objective is noted. The Council supports the construction of car parks which are well designed, in line with the Essex Design Guide Parking Standards. Chapter 7 sets out policy with regard to development within Conservation Areas, and policy SPL3 outlines design practices which balance the conservation of local character with practical matters.
988	3617	Mrs Carla Leonard-Wrigjt [988]	Beaumont - name meaning beautiful hill, to erect 20 houses destroying the landscape, wildlife's natural inhabitat and the unspoilt views of an established community of more than the 20 intended homes affecting over 100 year old properties on top of the hill on an already very busy road, destroys the village landscape, effects residence emotional and mental wellbeing, triggers established residence to move, effects their house prices and breaks down already close knit community. This proposal would not encourage integration but division. People have moved to this location for the country position and views and this would be destroyed!	Object	This representation is noted. The Council understands that these developments may have significant impacts on residents locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the historic environment. The Local Plan retains policies with regard to the historic environment, which can be found in Chapter 7.
989	3631	Mr Lewis Leonard-Wright [989]	Beaumont To erect 20 houses destroying the landscape, wildlife's natural habitat and unspoilt views of an established village community impacts a significant amount of residence then the benefit of 20 intended homes directly affecting over 100 year old properties on top of a hill on a very busy road, destroys the village landscape, effects residence emotional and mental wellbeing, triggers established residence to move, effects their house prices and breaks down already close knit community. This proposal would not encourage integration but division. People have moved to this location for the country position and views and this would be destroyed!	Object	This representation is noted. The Council understands that these developments may have significant impacts on residents locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the historic environment. The Local Plan retains policies with regard to the historic environment, which can be found in Chapter 7.
988	3634	Mrs Carla Leonard-Wrigjt [988]	Beaumont has a unique village Character and Design: The proposed development does not respect the village's rural character. It is important to protect its heritage and identity and sustain its agricultural economy. Until recently, this plot of land has been used to produce crop. In addition, the	Object	The Council acknowledges concerns about landscape character. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple

			proposed site is within close proximity to historic sites and listed buildings. The Environmental Impact: Loss of green spaces will have an adverse impact on habitats for protected species		factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure. Please see Chapter 7 for more information.
989	3635	Mr Lewis Leonard-Wright [989]	Beaumonts charming village Character and Design: The proposed development does not respect the village's rural character. It is important to protect its heritage and identity and sustain its agricultural economy. Until recently, this plot of land has been used to produce crop. In addition, the proposed site is within close proximity to historic sites and listed buildings. The Environmental Impact: Loss of green spaces will have an adverse impact on habitats for protected species.	Object	The Council acknowledges concerns with regard to landscape character. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure.
1034	3665	Mr Dean Garwood [1034]	TDC Planning dept. now seem to completely disregard this aspect of their policy. The current proposals, SAH2 - 420 dwellings to the rear of Thorpe Road, and MSA17 & MSA18 - 30 dwellings in Kirby le Soken all on Green Belt land, do absolutely nothing to 'conserve or enhance Tendring District's historic environment' or the settings, landscapes and views. What these plans will do is to effectively promote the coalescence of local villages, close up the Green Belt and destroy their rural settings.	Object	This representation is noted. The Council understands that these developments may have significant impacts on residents and the historic environment locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the historic environment. The Local Plan retains policies with regard to the historic environment, which can be found in Chapter 7.
1030	3699	Mr Paul Lewis [1030]	Fully support this part of the proposal.	Support	Noted.
1066	3746	Mr Gavin Tuff-Lacey [1066]	Listed buildings are maintained as huge expense to their owners for the good of the nation. The setting of these buildings should be preserved as much as the buildings themselves.	Support	Noted. The Local Plan has policies which protect the historic environment as well as listed buildings. Please see Chapter 7 for more information, as well as Policy PPL8 and Policy PPL9.
1064	3767	Mrs Elizabeth Sadler [1064]	Nothing is going to be enhanced by 200 houses being built behind my back garden which will destroy the wonderful view that convinced me to buy my house. The whole environment will be compromised and destroyed.	Comment	This representation is noted. The Council understands that these developments may have significant impacts on residents and the historic environment locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the historic environment. The Local Plan retains policies with regard to the historic environment, which can be found in Chapter 7.
752	3798	Mr Christopher Walpole [752]	Any historic environment would be very much lost with the planned development , looking at the historic woodlands and hedgerows in the Frating / Hare green area this would in fact be likely catastrophic to local wildlife as the loss of farmland and woodland along with top grade farmland loss the historic impact in the area would be catastrophic for our already struggling wildlife particularly our wild birdlife in the area which as already struggling with recent developments.	Object	This representation is noted. The Council understands that these developments may have significant impacts on residents and the historic environment locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The

			We would certainly exceed the tipping point for our much loved historic environment which would be obliterated by further mass developments		Council is, therefore, working to balance such housing targets with the preservation of the historic environment. The Local Plan retains policies with regard to the historic environment, which can be found in Chapter 7.
1148	3866	Mr David Green [1148]	the plan will not do this	Support	Please see policies in Chapter 7 of the Local Plan for more information on how the historic environment will be preserved locally.
1107	3884	Mr Philippe Whyte [1107]	Please do this, though the track record so far has been very bad.	Support	Noted.
616	3895	Mr Kevin Everitt [616]	How will conserving and enhancing landscapes be achieved when the plan is to build over so much of it?	Support	The Council understands that these developments may have significant impacts on residents and the historic environment locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the historic environment. The Local Plan retains policies with regard to the historic environment, which can be found in Chapter 7.
1352	4034	Mrs Paula Bland [1352]	It is imperative that we preserve the heritage that we have.	Comment	Noted. This is supported by the Local Plan within Chapter 7.
581	4063	Mrs Sally Webb [581]	Historic areas need to be protected and overcrowding does nothing for that.	Comment	Noted. The Council understands that these developments may have significant impacts on residents and the historic environment locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the historic environment. The Local Plan retains policies with regard to the historic environment, which can be found in Chapter 7.
1391	4260	Mrs Laurence Dewey [1391]	I hope this would be achieved in a sensitive manner and with common sense.	Support	Noted. Please see policies which address the historic environment in Chapter 7 of the Local Plan.

Objective 7: Historic Environment

Summary of Representations

Objective 7 was met with a mix of support and objections. Historic England encouraged the Council to draw on the knowledge of local conservation officers, the county archaeologist, and local heritage groups during the Local Pan review. Frating Parish Council argued that the proposed development, as well as the planned Nationally Significant Infrastructure Project (NSIP), in Little Bromley will urbanise the local area and will result in agricultural land being lost. Lawford Parish Council supported the objective, but recommended the inclusion of Lawford Tye Field within areas protected by the Local Plan. Members of the public expressed concerns with regard to the historic environment and local character. Some respondents argue the increase in housing numbers is disproportionate to the local character of the area and stated such changes to the District's villages would negatively impact residents' emotional and mental wellbeing, bring down house prices, impact the environment and break down communities. Other representations express general support for the Objective, agreeing that listed buildings and historic sites should be preserved.

In response, Objective 7 has been updated to include reference to the two National Landscapes in the District. The Council will continue to engage with the relevant stakeholders for all heritage matters and consult Historic England where necessary. This objective outline's the Local Plan's ambition to conserve and enhance the historic environment which many residents have expressed concern over.

Objective 8: Biodiveristy and blue and green infrastructure

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
926	3839	National Landscape Office (Beverley McClean, National Landscape Planning Officer) [926]	There is no Objective for Designated Landscapes /Areas of Outstanding Natural Beauty in the Objectives for the Plan Section therefore, I have had to make this comment under the Protected Places Biodiversity objective. As parts of the Dedham Vale and Suffolk & Essex Coast & Heaths National Landscapes fall withing Tendring District, a Strategic objective covering National Landscapes should be included in the Local Plan. Failing to do this could make it more difficult to demonstrate how as a Relevant Authority, Tendring Council has sought to meet its Section 85 duty.	Object	This objection is noted. The Council has updated the Local Plan to include specific reference to the National Landscapes in Objective 7: The Historic Environment.
826	14495	Essex Wildlife Trust (Annie Gordon) [826]	The plan does not include a standalone strategic Green Infrastructure (GI) and Nature Recovery policy. NPPF paragraph 192 requires plans to identify, map, and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of designated sites, wildlife corridors and stepping stones, and areas identified by national and local partnerships for habitat management, enhancement, restoration, or creation. While GI requirements are embedded within PPL4, PPL4a, PPL1 (flood risk), and individual allocation policies, there is no spatial framework that brings these elements together as a coherent whole. The absence of a GI network map — identifying strategic GI corridors, the existing LoWS network, ancient woodland, priority habitats, LNRS strategic opportunity areas, and the connections between them — means that the plan cannot demonstrate compliance with NPPF paragraph 192(a). It also means that decision-makers and developers lack the spatial context to assess whether individual proposals enhance or undermine the ecological network. We strongly recommend that the plan be accompanied by a GI and Nature Recovery strategy and map, and that a strategic policy be introduced that sets out the spatial priorities for GI delivery linked to the LNRS.	Comment	The Council refers to the Essex Green Infrastructure Strategy, and thus, it is not considered necessary to develop another strategic GI policy for Tendring, more specifically.
Businesses, Landowners and Developers					
136	4361	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	ditto as before	Support	Noted.
Community Representatives					
1110	3819	Lawford Parish Council (Cllr Giancarlo	We support the objectives for Biodiversity and Green and Blue Infrastructure, and as for our previous comments we will be suggesting the inclusion of protecting that Lawford Tye Field between School Lane playing field and Grange road, where in her reason for dismissing an Appeal the Planning Inspector gave great weight European Protected Sites	Support	The comments here are noted and it is considered that further protection of this site could be allowed by the Council by the designation of Safeguarded Open Space. It is recognised that the

		Guglielmi, County, District, and Parish Councillor) [1110]	as the main reason for Dismissal because the site lies within the Zone of Influence of the Stour and Orwell Estuaries SPA/Ramsar sites, and increased recreation from residents would likely harm protected bird habitats.		space is used informally as public open space and the land adjacent is also protected by this same designation.
953	3467	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
Members of the Public					
970	3558	Ms Bonnie Green [970]	The proposed build at Kirby Cross leading to Thorpe Le Soken, will obliterate the wildlife, including Owls, bats, deer, rabbits, foxes etc. Any type of managed 'space' you put in will not cater to wildlife, any building on this last stretch of land untouched by housing in the last 5 yrs, including Finches park and Thorpe road, will finish it off. The Council are considering biodiversity at all , nor the community, which has endured in excess of 500 houses built in the last 5 years. The area will no longer be a desirable place to live.	Object	Concerns with regard to local wildlife is noted. The Council understands that these developments may have significant impacts on local ecosystems. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the local environment. The Local Plan retains policies with regard to the environment, which can be found in Chapter 7.
969	3576	Mr Scott Gilmour [969]	It is essential for green and blue infrastructure to proliferate in urban spaces where possible. Not only to provide resilience to climate change but nurture wildlife. Sheffield is a brilliant example of inspiration with their 'Grey to Green' scheme. A similar scheme could be pursued with the removal of unnecessary parking spaces, the construction of shared/cycle infrastructure and what not. As active travel and wildlife both benefit from reduced pollution and quiet areas that are less disturbed by vehicles.	Support	Support for green and blue infrastructure is noted. The Council agrees with this idea and has kept policies which promote blue and green infrastructure in the Local Plan. Please see policies PPL4, PPL4a, and Chapter 7 more widely for more information. The Council also supports active travel. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces.
988	3623	Mrs Carla Leonard-Wrigjt [988]	Beaumont - 20 new houses obstructing and destroying countryside views does not enhance the quality of natural beauty or support biodiversity. People chose this location for its countryside and unspoilt views the properties which this will directly affect have been there over 100 years. Built and bought for the beautiful unspoilt location. The road when moving here was a big compromise due to how busy and dangerous it already is...but the rural village was why we chose the area to avoid the rat race and the onslaught of new house builds, this proposal would destroy a beautiful village.	Object	Concerns with regard to local wildlife are noted. The Council understands that these developments may have significant impacts on local ecosystems. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the

					local environment. The Local Plan retains policies with regard to the environment, which can be found in Chapter 7.
1030	3700	Mr Paul Lewis [1030]	Any developments that go ahead should have green and blue infrastructure as a core component. Green open space is most desirable which begs the question why would we build on it in the first place. Any development that goes ahead should have a blue infrastructure plan that helps minimise flood risk and encourages nature at its heart.	Support	This is noted. With reference to Policy PPL1, all development must include the appropriate measures to respond to the risk of flooding on and/or off site. Developments proposed within the Flood Zone involving sites of 1ha or more must be accompanied by a Flood Risk Assessment, which outlines risk and often requires Sustainable Drainage plans for the project. Further details with regard to how sustainable drainage systems and planned and implemented are dealt with by the Development Management team at TDC.
1064	3768	Mrs Elizabeth Sadler [1064]	My house backs onto the most beautiful fields with views of backwaters and Felixtowe harbour,with glorious sunsets in the Summer months.; this will be totally obliterated by 200 houses . The land is designated as a "protected environmental area" ,and there is a sign post declaring it. I see barn owls,kestrels,deer,hares,curlews,pheasants, and bats ;to name but a few ;all will have their habitats destroyed if this horrific building takes place. Many varieties of birds nest in the hedges. Swallows and swifts fill the skies in Summer.	Comment	Concern with regard to local wildlife is noted. The Council understands that these developments may have significant impacts on local ecosystems. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the local environment. The Local Plan retains policies with regard to the environment, which can be found in Chapter 7.
1113	3788	Mr Keith Smithard [1113]	Building over fields, specify Mears Meadow, the last open field in Frinton within the gates, does not sustain wildlife or local ecology. There are bats living in the field who use the insects, supported by the biodiversity within it to feed. It will mean this family of bats are lost. It is home to deer, pheasants and kestrels ,as well as many other species, field mice and hedgehogs. Squeezing in 40 houses where there not needed seems crazy and wreck less.	Object	Concern with regard to local wildlife is noted. The Council understands that these developments may have significant impacts on local ecosystems. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the local environment. The Local Plan retains policies with regard to the environment, which can be found in Chapter 7.
752	3799	Mr Christopher Walpole [752]	looking at the Frating / Hare green proposals it is absolutely ridiculous to consider that such large developments are able to improve diversity , even the BNG targets of 10 % increase in biodiversity are very questionable and in fact it is likely most are very exaggerated . The real facts are habitats lost are not replaceable and in most cases promised habitats do not materialise with examples of bird boxes , hedgehog passageways along with wildlife friendly ponds commonly do not form part of the final development , i do not envisage we will not experience huge biodiversity loss	Object	Concern with regard to local wildlife is noted. The Council understands that these developments may have significant impacts on local ecosystems. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the local environment. The Local Plan retains policies with regard to the environment, which can be found in Chapter 7.
1148	3867	Mr David Green [1148]	The increase in pollution in particular will not achieve this objective.	Support	Whilst these concerns are noted, pollution is addressed in Chapters 7 and 8 of the Local Plan. Environmental protections alongside active

					travel schemes will mitigate increased pollution as a result of development.
1107	3886	Mr Philippe Whyte [1107]	The housing paln along with the subsequent increase in population from outside the area will do the opposite of the objectives of this policy.	Comment	Concern with regard to local wildlife is noted. The Council understands that these developments may have significant impacts on local ecosystems. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the local environment. The Local Plan retains policies with regard to the environment, which can be found in Chapter 7.
616	3896	Mr Kevin Everitt [616]	Any new development must have sufficient spaces around it clearly separating existing buildings/properties to include wildlife corridors in the form of thick hedging, trees and ditches to allow wildlife to move freely.	Support	Whilst these comments are noted, these points are found with other policies in the Local Plan, and as the Plan should be read as a whole, that will be addressed in due course. These detailed points will also be considered at the application stage, outside of the Local Plan Process.
1351	4005	Tom Moat [1351]	I support this but measures need to be included that protect the management of these spaces in perpetuity, that are driven by nature and for nature, and that ensure Council representatives are trained in monitoring the ecological health of these newly created spaces and hold developers to account if they don't function ecologically as planned.	Support	Whilst these comments are noted, these points are considered within PPL4 and PPL4a, which consider biodiversity net gain and habitat creation.
1352	4033	Mrs Paula Bland [1352]	We already have this. It's called farm land, open countryside, country parks and the seaside. The local plan is not creating this. It is removing what we have and enjoy.	Comment	The Council recognises concerns about the loss of agricultural land and the preference for development on brownfield sites. However, Tendring has a very limited supply of previously developed land, much of which has already been brought forward for development. As a result, and in order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this land is classified as best and most versatile agricultural land, which limits the ability to avoid such impacts. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure.
581	4067	Mrs Sally Webb [581]	Building on productive farm land is not helping biodiversity; nor is the pollution which will be present with overcrowding the area with houses. The sewage works at Manningtree is not able to cope with the existing housing; where are the plans to increase its capacity; it is land locked and discharging into the river when it can.	Comment	The Council recognises concerns about the loss of agricultural land and the preference for development on brownfield sites. However, Tendring has a very limited supply of previously developed land, much of which has already been brought forward for development. As a result, and in order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this

					land is classified as best and most versatile agricultural land, which limits the ability to avoid such impacts. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure. The Council will continue to work with the relevant infrastructure providers to ensure that adequate sewage facilities are provided locally. Currently, the Council has updated the Infrastructure Delivery Plan, which will provide information with regard to where infrastructure is needed to support development.
1383	4230	Mrs Joanna Thornicroft [1383]	The proposal at Wrabness does the opposite of this. The light pollution, noise pollution and increase in pets which are often bird predators on the edge of an RSPB reserve seems bizarre, and poorly considered. There will be a zero gain in biodiversity and geodiversity. What survey have been conducted to understand the impact on this protected area? I cannot see any	Object	The Council recognises concerns about the loss of agricultural land and the preference for development on brownfield sites. However, Tendring has a very limited supply of previously developed land, much of which has already been brought forward for development. As a result, and in order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this land is classified as best and most versatile agricultural land, which limits the ability to avoid such impacts. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure.
1382	4241	Ms Tamasin Davies [1382]	Wrabness is close to the SSI. Residential developments so close to the estuary will mean increased pressure - in particular dog walking, dogs running loose disturb birds, wildlife disturbance due to noise and lights, fragmentation the corridors of habitat wildlife currently travels. Given the scale of the development relative to the size of the existing population, there is a real risk of disturbance by many new residents who running, walking or cycling but disturbing natural habitats. I cant see evidence of the ecological impact having been assessed or proposals to mitigate or avoid the adverse effects on wildlife and nature	Comment	Concern with regard to local wildlife is noted. The Council understands that these developments may have significant impacts on local ecosystems. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the local environment. The Local Plan retains policies with regard to the environment, which can be found in Chapter 7. The Council also refers to the Essex Coast Recreational Disturbance Avoidance Mitigation Strategy (RAMS), which uses developer contributions to mitigate against disturbance to local wildlife.

1391	4261	Mrs Laurence Dewey [1391]	I would love to see to see biodiversity preserved and promoted. Building 4000 new homes seems the antithesis of protecting biodiversity.. It would disrupt and destruct wildlife habitat, undermine local ecosystems and contradict broader environmental and climate objectives. Besides, the loss of agricultural land is irreversible. How can the nation be sustainable if it destroys its productive agricultural capacity?	Comment	The Council recognises concerns about the loss of agricultural land and the preference for development on brownfield sites. However, Tendring has a very limited supply of previously developed land, much of which has already been brought forward for development. As a result, and in order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this land is classified as best and most versatile agricultural land, which limits the ability to avoid such impacts. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure.

Objective 8: Biodiversity and blue and green infrastructure

Summary of Representations

Many suggestions were given for Objective 8. The National Landscape Office suggested a new objective be created which specifically covers the two National Landscapes present in the District. Essex Wildlife Trust recommended the Council have a standalone strategic Green Infrastructure and Natural Recovery policy which would include a GI network map identifying GI corridors, the existing LoWS network, ancient woodland, priority habitats, LNRS strategic opportunity areas, and the connections between them. Lawford Parish Council suggested protections of Lawford Tye Field to be included within the Local Plan. Members of the public both supported and objected to the objective. Many argued that the new developments will destroy the local wildlife, increase pollution, and negatively impact biodiversity in the District. One respondent suggested a 'grey to green' scheme, which would remove unnecessary parking spaces to be replaced with active travel infrastructure and greenery. Another respondent suggested that all new development should have sufficient space to encourage ecological networks between buildings and developments. It was also recommended the Council has representatives trained in monitoring ecological health in order to protect the management of green spaces in perpetuity. Other concerns were given with regard to sewage, the evidence base, and agricultural capacity.

In response, there are no changes required for Objective 8. Greater detail on the Local Plan's approach to biodiversity and green and blue infrastructure can be found in Chapter 7 of the Local Plan.

Objective 9: Water and Flood Risk

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
349	4287	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	With the recently updated flood risk models clearly demonstrating that flooding is going to be more prominent in the future, this is very important. Flooding significantly affects residents physical and mental health in both the short and long term and this is likely to be more common in the future. Community hubs should not be built in Flood Zone areas 2 and 3 (if it can be avoided) as they are often used as places of refuge during emergencies.	Comment	These comments are noted.
6	13453	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water continues to support this objective and consider SuDS to be an essential component of all new housing and employment development to manage surface water run-off and flood risk, but also as part of an integrated water management approach. We agree that coastal change is also an important matter to address in terms of managing development within the Coastal Protection Belt. We would wish to see reference to water efficient development under this objective to address the sustainable use of water resources, as the east of England is an area identified as being in serious water stress. The Shared Standards for Water Efficiency in Local Plans?(published in June 2025) set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery.	Support	These comments are noted. Objective 9 has been updated to encourage water efficient design. Further considerations to water efficient design can be found within Policy PPL5.
148	14462	Environment Agency (Environment Agency) [148]	We are pleased to see the inclusion of coastal change within Objective 9. We feel that the objective could be enhanced to include an aspiration to maximise opportunities provided by new development along with improvements in green and other infrastructure to reduce the causes and impacts of flooding as this aligns well with policy aspirations in para 172(c) of the National Planning Policy Framework (NPPF). The objective could also be enhanced by including an aspiration to safeguard land from development that is likely to be required for current or future flood risk management or that is vulnerable to coastal erosion. further, Objective 9: Water and Flood Risk (or a further objective) should incorporate the specific requirement to protect water as a resource, including groundwater resources.	Comment	These comments are noted. Objective 9 has been updated to encourage water efficient design and to encourage the sustainable use of water resources.
Businesses, Landowners and Developers					
136	4362	Andrew Martin-Planning Limited (Mr Andrew	ditto as before	Support	Noted.

		Martin, Director) [136]			
Community Representatives					
953	3468	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
799	3811	Frating Parish Council (Cllr Paula Bland) [799]	All agencies are already aware of the issues in Frating and Great Bromley with surface water flooding and the sewerage system unable to cope for much of the time and particularly in times of heavy downpours of rain resulting in properties being flooded with surface water and sewage. Any development will be over an underground lake which is a Groundwater Protection Zone.	Comment	The Council acknowledges concerns with regard to flood risk and sewage. There are also policies in place, such as Policy PPL1, which give guidance on how development proposals should provide the appropriate measures to respond to flood risk. The Council will continue to work with the Environment Agency and the relevant partners to mitigate flood risk, alongside these policies within the Local Plan.
Members of the Public					
969	3577	Mr Scott Gilmour [969]	As the planet continues to warm, mediating the consequences of climate change is essential, this has been demonstrated by the record rainfall the UK is experiencing. To reduce the risk of inundation, there will need to be ample space reserved for SuDS and other greenery. Car orientated infrastructure has historically been a large barrier to this, with car parks dominating large swathes of land and roads carving through fields. There is hopefully a solution that accommodates the travel needs of all residents without sacrificing the valuable space needed for flood prevention.	Support	The Council acknowledges that flood risk mitigation is required for developments on greenfield land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape. Whilst the Council acknowledges car parks can have negative effects on fields and floodplains, the Local Plan seeks to balance the need for car park provision with adequate requirements for Sustainable Drainage Systems and other forms of flood risk mitigation. The Council encourages active travel in the Local Plan. Policy CP1 outlines that all applications for major developments should include proposals for “safe, direct and attractive walking and cycling routes that link to existing networks”.
988	3624	Mrs Carla Leonard-Wrigjt [988]	Beaumont - although hills do not specifically flood, the large volume of water creates a lot of issues if inadequate drainage is in place. Farm land supports drainage. When buying our house the surveyor advised that land locally had subsidence issues, this is not a suitable area for development.	Object	The Council acknowledges that flood risk mitigation is required for developments on greenfield land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for

					more detail with regard to biodiversity, water conservation, and the rural landscape.
989	3633	Mr Lewis Leonard-Wright [989]	Beaumont - although hills do not specifically flood, the large volume of water creates a lot of issues if inadequate drainage is in place. Farm land supports drainage. When buying our house the surveyor advised that land locally had subsidence issues, this is not a suitable area for development.	Object	The Council acknowledges that flood risk mitigation is required for developments on greenfield land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape.
1030	3701	Mr Paul Lewis [1030]	Fully support this proposal. Special consideration should be given to coastal erosion which should already be a priority.	Support	Support for this objective is noted. The Local Plan prioritises coastal protection in Policy PPL2, and specifically prioritises the protection of the Naze at Walton from coastal erosion. The Council understand that coastal erosion could have detrimental effects at the Naze, where the local Water Recycling Centre is located. The Council will continue to take guidance from the Essex and South Suffolk Shoreline Management Plan, and will continue to work with the Environment Agency, Essex County Council, other District Councils, the Marine Management Organisation and the relevant stakeholders to protect the coast.
1064	3770	Mrs Elizabeth Sadler [1064]	The land behind my house is FLOOD PLAIN but no one seems to bother about it as long as houses are built. The water will come in again during flooding; it always comes in from around the backwaters .and then out to sea; most of the town is designated as flood plain. NO MATTER WHAT YOU DO you can't keep the sea out, and with climate change, this makes flooding of the area far more likely.	Comment	The Council acknowledges that flood risk mitigation is required for developments on greenfield land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape.
752	3800	Mr Christopher Walpole [752]	The area of Frating is an area already prone to regular flooding due to the current overdevelopment of the area related to the current sewage and water infrastructure we have in place, the area has a very high water table . For further development we do not have sufficient provision or both water and the waste water/ sewage is already under immense pressure, Loss of further farmland will also increase the risk of local flooding with further loss of natural soakaways will likely be very apparent, considerable infrastructure development would be necessary.	Object	The Council acknowledges concerns about developments on fields. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. With that being said, the Council acknowledges that flood risk mitigation is required for developments on such land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape. The Council will continue to work with the Environment Agency and other relevant infrastructure providers to ensure developments mitigate flood risks.

1148	3868	Mr David Green [1148]	Brightingsea's coastal heritage is valuable. While supporting the need for flood defences it must be done to help preserve the salt marsh and associated wildlife in particular.	Comment	This representation is noted. The Local Plan prioritises coastal protection in Policy PPL2. Please see Chapter 7 of the Local Plan for greater detail. The Council will continue to take guidance from the Essex and South Suffolk Shoreline Management Plan, and will continue to work with the Environment Agency, Essex County Council, other District Councils, the Marine Management Organisation and the relevant stakeholders to protect the coast.
1107	3887	Mr Philippe Whyte [1107]	The plan, building on fields, increasing the local population etc. will do the opposite of this.	Comment	The Council acknowledges concerns about developments on fields. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. With that being said, the Council acknowledges that flood risk mitigation is required for developments on such land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape. The Council will continue to work with the Environment Agency and other relevant infrastructure providers to ensure developments mitigate flood risks.
1351	4007	Tom Moat [1351]	Flooding is an important consideration. Specific mention should be made to prioritise natural flood management principles above built infrastructure. Also, when considering water, we should be ambitious in insisting on rainwater harvesting infrastructure for all newly built properties. We also need to consider shade as a necessary commodity in the face of rising temperatures. Tree species should be considered to assist in this.	Comment	Concern with regard to flood risk are understood. PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape. The Council refers to the Essex Design Guide, which provides guidance on shade and plant types. Please see the link for more detail.
1352	4032	Mrs Paula Bland [1352]	The village of Frating, and others around us, already have a significant risk of flooding, which hasn't been addressed during the building that has already taken place despite strong representations by the Parish Council and ongoing talks with Anglian Water. Address these problems before building more homes, commercial units, roads etc. We are sitting on an underground lake. Where is the water supposed to go?	Comment	The Council acknowledges concerns about developments on fields. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. With that being said, the Council acknowledges that flood risk mitigation is required for developments on such land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue

					infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape. The Council will continue to work with the Environment Agency and other relevant infrastructure providers to ensure developments mitigate flood risks.
581	4072	Mrs Sally Webb [581]	There should be no developments on flood plains. There is no natural water to be extracted in the peninsula.	Comment	The Council acknowledges concerns about developments on fields. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. With that being said, the Council acknowledges that flood risk mitigation is required for developments on such land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape. The Council will continue to work with the Environment Agency and other relevant infrastructure providers to ensure developments mitigate flood risks.
1373	4204	Mrs cindy BROWNE [1373]	There would be no risk of flooding The area is an area of reduced rain fall and in an area where food is produced which often requires frequent watering due to drought conditions.	Comment	The Council acknowledges concerns about building on open and agricultural land. However, due to the rural character of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure. With that being said, the Council acknowledges that flood risk mitigation is required for developments on such land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape. The Council will continue to work with the Environment Agency and other relevant infrastructure providers to ensure developments mitigate flood risks.

1376	4213	Mrs Anja Newman [1376]	Don't build on flood plains or water meadows.	Comment	The Council acknowledges concerns about building on open and agricultural land. However, due to the rural character of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure. With that being said, the Council acknowledges that flood risk mitigation is required for developments on such land. Policy PPL5 sets out how new development should include Sustainable Drainage Systems (SuDS) to reduce flood risk and enhance green and blue infrastructure. Applicants should explain and justify the reasons for not using SuDS if not included in development proposals. Please see Chapter 7 for more detail with regard to biodiversity, water conservation, and the rural landscape. The Council will continue to work with the Environment Agency and other relevant infrastructure providers to ensure developments mitigate flood risks.
1383	4231	Mrs Joanna Thornicroft [1383]	I support any effort particularly around erosion. The coastline around Wrabness has been particularly effected	Support	Noted.
1391	4262	Mrs Laurence Dewey [1391]	This must be taken into consideration.	Comment	Noted.

Objective 9: Water and Flood Risk

Summary of Representations

Many technical stakeholders made suggestions to Objective 9. The Suffolk and North East Essex ICB (NHS) recommended that community hubs should not be built in Flood Zone areas 2 and 3, as these spaces are often used as places of refuge during emergencies. Anglian Water and the Environment Agency suggested a reference to water efficient development under the objective. The Environment Agency suggested that the objective should include an aspiration to improve green and other infrastructure to reduce the causes and impacts of flooding alongside new development. The Environment Agency also suggests including an aspiration to safeguard land which is currently a flood risk or may require flood risk management in the future from development. This also includes land which is vulnerable to coastal erosion. Frating Parish Council stated that any development in Frating and Great Bromley will be over an underground lake, which would be within a Groundwater Protection Zone. Some members of the public expressed support for the objective, agreeing that mitigating the consequences of climate change, coastal erosion and flood risk are imperative to consider when proposing development. One respondent mentioned that natural flood management principles should be specifically mentioned in the objective, and that rainwater harvesting infrastructure and shade should be considered for all newly built properties. Others stated that no development should take place in flood zones.

In response, Objective 9 has been updated to include reference to water-efficient development and the sustainable use of water resources. Coastal change and flood risk mitigation continue to be a part of the objective. More specific policies with regard to sustainable design can be found in Chapter 3 of the Local Plan, whilst policies with regard to flooding and climate change can be found in Chapter 7.

Objective 10: Tourism Promotion

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
Community Representatives					
799	3812	Frating Parish Council (Cllr Paula Bland) [799]	This development will urbanise the gateway to Tendring. Increased congestion and reduced accessibility could have a negative impact on tourism, upon which the district is heavily reliant. As with previous proposals, the Clacton - Harwich link road is presented as a key benefit. Yet if this road is not delivered in full, traffic in an area already heavily congested at peak times and throughout the summer months will deteriorate further, potentially reaching gridlock.	Comment	The Council understands that these developments may have significant impacts on residents locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the natural landscape and historic environment which attracts much of the tourism to the District. The Council has updated its transport modelling, as well as the Infrastructure Delivery Plan, to have a better understanding of the infrastructure required to support new development. In the interim, the Council will continue to work with Essex Highways and other relevant partners.
953	3469	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified
Members of the Public					
969	3578	Mr Scott Gilmour [969]	Creating a more inviting environment for tourism is a great objective. Not only would it facilitate job growth, attracting more visitors to travel locally is a great way to stimulate more investment and prevent additional emissions from aviation. Likewise, improving public transport such as more frequent train and bus services would encourage more tourists to visit by more environmentally friendly modes of transport and avoid generating additional vehicle traffic that occurs during the busy months. Also amending and expanding when timetables start and end would give tourists better peace of mind for how long they can visit.	Support	Noted.
1030	3702	Mr Paul Lewis [1030]	Support this proposal with reservations. I am acutely aware that some of the homes being proposed could in fact end up as second or holiday homes, especially the more affordable options. A local tax should be implemented on such properties either new or existing to create funds for enhanced tourism.	Support	The Council acknowledges concerns surrounding the increase in housing numbers. Whilst the suggestion for a tax on second homes is noted, this is outside the remit of the Local Plan.
1064	3771	Mrs Elizabeth Sadler [1064]	This planned housing will DESTROY THE ENVIRONMENT and NOT enhance it ; therefore it will have a negative affect on tourism. If you flood the housing sector with socially deprived London Borough	Comment	The Council understands that these developments may have significant impacts on residents locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views

			overflow ,it will most certainly destroy any sort of tourism we may have in the future. No none wants to be in an area where there are children/young people running riot and drug dealers on the seafront. Sadly we already have single mothers with problem children in some of the new housing ; we caught them riding bikes inside the local church (which is open each day)		these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the natural landscape and historic environment which attracts much of the tourism to the District.
752	3801	Mr Christopher Walpole [752]	Tourism promotion is one area which is very hard to envisage improved and one which will be enhanced by further development as this will only dramatically increase the road congestion we are experiencing thus deterring further visitors to the area of Clacton on Sea . Certainly significant development in the Clacton and Jaywick area is required along with funding for these improvements , however the areas are so badly run down it is most unlikely current funding plans would do much more than scratch the surface , employment opportunities are very limited with improvements not very likely in the short-term	Object	The Council understands that these developments may have significant impacts on residents locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the natural landscape and historic environment which attracts much of the tourism to the District. With regard to economic deprivation in the District, The Council has targeted regeneration schemes in the more deprived areas of the District, such as Jaywick Sands. In general, the Local Plan aims to support and diversify the economy across the District while maintaining a broad balance between homes and jobs. Please see Policies PP6 and PP7 for more information.
1148	3869	Mr David Green [1148]	While appreciating the benefits of tourism in Brightlingsea I fail to see how increasing the population by 100s and making access via our main road will bring any tourism benefits.	Support	The larger housing allocation in Brightlingsea (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, two smaller sites have been included within the urban area of Brightlingsea. This change has brought about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment. The Council understands that these developments may have significant impacts on residents locally. However, it is important to note that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the natural landscape and historic environment which attracts much of the tourism to the District.
1107	3888	Mr Philippe Whyte [1107]	This would be good	Support	Noted.
1352	4031	Mrs Paula Bland [1352]	Tendring already relies on tourism for much of its income. Without significant improvement to the road net work and junctions the already bad road congestion will only get worse resulting in tourists being put off coming to the area and a loss of revenue. As a resident I don't leave my home on good weather days; I have no intention of sitting in a car park on the A120 or A133 trying to get to the coast.	Comment	Concerns with regard to traffic congestion are acknowledged. The Council understands that there is a need to adequately plan infrastructure to accommodate the addition development in the District. The Infrastructure Delivery Plan (IDP) and transport modelling have recently been updated to give guidance as to where roads and facilities are needed to support an increase in housing and population. The Local Plan also supports alternative methods of travel, such as public transportation and active travel. Policy CP1 encourages planning applications to include proposals for safe, direct, and attractive walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise

					the need for active travel networks to link town centres, railway stations, schools, and green spaces. The Council will continue to work with Essex Highways and the relevant partners to provide adequate road infrastructure alongside development.
581	4074	Mrs Sally Webb [581]	Tourists have always been welcomed and there is scope for development; but once again infrastructure is required in advance of that development	Support	With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council also continues to work with infrastructure providers, such as National Highways, Essex County Council, the NHS/ICB, Anglian Water, Affinity Water, and the relevant infrastructure providers in doing so.
1391	4263	Mrs Laurence Dewey [1391]	We do not need 4000 new homes to support tourism in the area. An intelligent use of existing assets and heritage is required. Just one example, Colchester Roman wall could be enhanced be made into a really attractive sight.	Comment	The Council understands that these developments may have significant impacts on residents locally. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government housing targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the natural landscape and historic environment which attracts much of the tourism to the District. The comments around heritage assets are noted. The Council is in the process of preparing a list of non-designated heritage assets. Whilst nominations for this project have already been submitted to the Council, a final round of consultation will take place in late 2026. More information can be found on the Council's website. With that being said, the Colchester Roman Wall falls outside the District's boundary and, thus, cannot be considered within the Local Plan.

Objective 10: Tourism Promotion

Summary of Representations

No technical stakeholders or businesses/developers/landowners commented on Objective 10. Frating Parish Council argued that development will urbanise Tendring, creating increased congestion and having negative impacts on tourism. Some members of the public were supportive of the objective, agreeing that the District should be a more inviting environment for tourism. One respondent discusses how greater tourism in the District can stimulate more investment and job growth locally. Other members of the public support the objective, but with reservations. Some concerns mentioned within representations include traffic congestion, second/holiday homes, environmental deterioration, and infrastructure capacity. One respondent mentioned the use of historic assets to attract visitors.

In response, no change is required to Objective 10. More information with regard to the Local Plan's tourism strategy can be found in Chapter 6.

Objective 11: Climate Change

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
148	14463	Environment Agency (Environment Agency) [148]	We support the strategic objective on Water and Climate Change, given Tendring's coastal location and increasing flood risks. It is essential that the latest climate change data informs the Plan, and we emphasise the need to update the SFRA to reflect current modelling and support the Sequential Approach. The existing SFRA is outdated and does not include recent climate or flood modelling data. We support the 8m fluvial buffer and recommend wider buffers for tidal defences, along with recognising permitting requirements for development within 16m of such defences.	Support	Support is noted. The SFRA has been updated and will support the Reg19 version of the Local Pan.
Businesses, Landowners and Developers					
136	4398	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	Refer to previous comments on Objective 1	Support	Noted.
Community Representatives					
953	3470	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
799	3813	Frating Parish Council (Cllr Paula Bland) [799]	Building the proposed number of houses and the commercial development can only increase carbon emissions and will not mitigate the effects of climate change.	Comment	Concerns regarding the emissions produced by construction and development are noted. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The Council is, therefore, working to balance such housing targets with the preservation of the historic environment. The Local Plan retains policies which protect the environment, which can be found in Chapter 7. Though the Council acknowledges construction and development will add to carbon emissions in the District, Policies are set out in the Local Plan, which promote Carbon Net Zero in Homes and Buildings (PPL10a), as well as Embodied Carbon and Circular Economy in Homes and Buildings (Policy PPL10b). In addition to these policies, new renewable energy installations will help the District transition from fossil fuels to clean energy sources. Please see Chapter 7 for more information.
Members of the Public					
969	3579	Mr Scott Gilmour [969]	Ensuring new developments produce as little of an impact on the climate as possible is desirable. Especially on an island nation	Support	This representation is noted. The Council agrees that developments should be sensitive to the natural environment and climate change.

			threatened by rising sea levels and worsening weather. Integrating blue and green design elements and reducing the amount of asphalt and concrete covering the new developments will hopefully minimise the impact on the climate. Providing an array of housing that are more dense in nature, along with solar panels and heat pumps already included would additional aid to satisfy housing requirements while keeping carbon emissions low.		Policy PPL4 states all new development must be designed to include new green and blue infrastructure and protect and enhance existing green and blue infrastructure locally. Policy LP3 addresses housing density and standards with regard to factors like green and blue infrastructure, housing mix, and healthy home principles (as set out by National Guidance). Other policies throughout the Local Plan contain wording which supports sustainability, local wildlife, and climate change mitigation. Please see Chapter 3 and Chapter 7 of the Local Plan for further information.
988	3625	Mrs Carla Leonard-Wrigjt [988]	Beaumont - the impact of 20 new houses in a rural area will not reduce carbon emissions. The need to drive will not be reduced, the road will become busier to support the new houses and as the road is a major route will continue to get more busy with all of the proposed new houses across the district. Safeguarding the countryside and minimalising developments in rural isolated areas is key to protecting our heritage and lifestyle choices. People will become more isolated and dependent on WiFi, this does not integrate communities.	Object	The Council acknowledges concerns about landscape character. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council is also updating its transport modelling, which will provide insights as to where additional transport infrastructure is required in the District. In the meantime, the Council will continue to work with infrastructure providers, such as National Highways, and Essex County Council to ensure growth is supported. The Local Plan also has several policies which support communities locally. Policy HP2 states that the Council will work with the development industry, as well as key partners, to deliver a range of new community facilities and enhance existing facilities. Please see Chapter 4 of the Local Plan for more information.
989	3632	Mr Lewis Leonard-Wright [989]	Beaumont - the impact of 20 new houses in a rural area will not reduce carbon emissions. The need to drive will not be reduced, the road will become busier to support the new houses and as the road is a major route will continue to get more busy with all of the proposed new houses across the district. Safeguarding the countryside and minimalising developments in rural isolated areas is key to protecting our heritage and lifestyle choices. People will become more isolated and dependent on WiFi, this does not integrate communities.	Object	The Council acknowledges concerns about landscape character. However, due to the rural nature of the District and high national housing targets, it is inevitable that most development must take place on greenfield land. With regard to infrastructure, it is noted that strained services are a concern. The Council has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council is also updating its transport modelling, which will provide insights as to where additional transport infrastructure is required in the District. In the meantime, the Council will continue to work with infrastructure providers, such as National Highways, and Essex County Council to ensure growth is supported. The Local Plan also has several policies which support communities locally. Policy HP2 states that the Council will work with the development industry, as well as key partners, to deliver a range of new community facilities and enhance existing facilities. Please see Chapter 4 of the Local Plan for more information.
1032	3661	Ms Jacquie Wilkes [1032]	The how this will be done needs further consideration considering the needs of rural communities	Comment	The Council acknowledges that approaches to climate change mitigation may need to be altered with regard to urban/rural differences. Provision of Electric Vehicle charging infrastructure is governed by Building Regulations, rather than the Local Plan. However, the Plan maintains in Policy CP1 that new development proposals must be sustainable in

			More car chargers needed, improved public transport and accessible foot paths.		terms of transport and accessibilities, with opportunities for sustainable modes of transport and walking and cycling routes. Please see Chapter 8 for further information on sustainable transportation.
1030	3703	Mr Paul Lewis [1030]	Fully support any proposals to mitigate the effects of climate change. I would say that major developments undertaken in the district will be adding to carbon emissions in a very large number.	Support	Though the Council acknowledges construction and development will add to carbon emissions in the District, Policies are set out in the Local Plan, which promote Carbon Net Zero in Homes and Buildings (PPL10a), as well as Embodied Carbon and Circular Economy in Homes and Buildings (Policy PPL10b). In addition to these policies, new renewable energy installations will help the District transition from fossil fuels to clean energy sources. Please see Chapter 7 for more information.
1064	3772	Mrs Elizabeth Sadler [1064]	Well this is an impossible task !! No one around here can afford expensive cars with low carbon emission rates,and no one will be able to afford houses that are adapted with various expensive gadgets to mitigate carbon emissions. Developers will be left with houses on their hands as at "Samphire Meadow" ,or they will be sold off to London Boroughs as I have previously mentioned ; something that you have engineered since the end of WW2 ,when the East End was sent to the East Coast and all the on-going problems of the infamous Jaywick were begun !!!	Comment	The Council acknowledges that not all residents can afford electric vehicles. Rather, the Local Plan's policies ensure that residents have greater choice in their method of travel. Policy CP1 encourages planning applications to include proposals for safe, direct, and attracting walking and cycling routes that link to existing networks. Both the North East Essex Implementation Plan and the Tendring Coast Implementation Plan (as part of Essex County Council's emerging LTP4), complement these policies and emphasise the need for active travel networks to link town centres, railway stations, schools, and green spaces. Concerns with regard to affordable housing are noted. Objective 1 sets out the need for the sufficient variety of housing, with regard to affordability and other variables. The appropriate variety of housing affordability and type is set out in the latest Strategic Housing Market Assessment (SHMA), which uses evidence-based methodologies to inform its outputs.
1113	3789	Mr Keith Smithard [1113]	Squeezing more houses within the gates, by building on green space will increase pollution, kill the species that live there and increase traffic.	Object	The Council acknowledges concerns about landscape character. However, due to the rural character of the district and high national housing targets, it is inevitable that most development must take place on greenfield land. The Council seeks to promote active travel routes throughout the District (see Policy CP1) and has set out policies, such as PPL3 and PPL4, which protect and conserve the natural environment. Please see Chapter 7 for more information.
752	3802	Mr Christopher Walpole [752]	Climate change in terms the impact we will experience with huge land disturbance will only increase the carbon release into the atmosphere dramatically , along with the impact of significant population increases the impact will only be negative , increases in vehicle emission's along with the normal population increase impacts it is very difficult to envisage any positive impact related to global warming . Any further commercial growth would also increase the local impact to global warming , increased traffic volumes on already very congested routes leading to more congestion and hence higher CO2 issues	Object	Though the Council acknowledges construction and development will add to carbon emissions in the District, Policies are set out in the Local Plan, which promote Carbon Net Zero in Homes and Buildings (PPL10a), as well as Embodied Carbon and Circular Economy in Homes and Buildings (Policy PPL10b). In addition to these policies, new renewable energy installations will help the District transition from fossil fuels to clean energy sources. Please see Chapter 7 for more information. With regard to traffic and congested roads, it is noted that strained services are a concern. The has updated its Infrastructure Delivery Plan, a document which will help in planning where infrastructure facilities and services should be placed to support development. The Council is also updating its transport modelling, which will provide insights as to where additional transport infrastructure is required in the District. In the

					meantime, the Council will continue to work with infrastructure providers, such as National Highways, and Essex County Council to ensure growth is supported.
1148	3870	Mr David Green [1148]	There seams to be a conflict of interest here in trying to reduce carbon emissions while encouraging roughly 600 new cars to add to the current car population. Some will be electric cars but current trends are not encouraging. There are no charging stations in town. Building techniques have improved but there will be an increase in pollution. Increased flow of delivery cans will also add to emissions. If the plan is implemented the lookout for Brightlinsea is not going to be cleaner air and reduced emissions.	Support	Though the Council acknowledges construction and development will add to carbon emissions in the District, Policies are set out in the Local Plan, which promote Carbon Net Zero in Homes and Buildings (PPL10a), as well as Embodied Carbon and Circular Economy in Homes and Buildings (Policy PPL10b). In addition to these policies, new renewable energy installations will help the District transition from fossil fuels to clean energy sources. Please see Chapter 7 for more information. Provision of Electric Vehicle charging infrastructure is governed by Building Regulations, rather than the Local Plan. However, the Plan maintains in Policy CP1 that new development proposals must be sustainable in terms of transport and accessibilities, with opportunities for sustainable modes of transport and walking and cycling routes. Please see Chapter 8 for further information on sustainable transportation.
1107	3889	Mr Philippe Whyte [1107]	15 minute city again. Carbon is the life of the planet, trees "breathe" carbon.	Object	The Council seeks to create sustainable developments with the adequate facilities and services to support residents. It is important to note the Council is not promoting 15-minute cities within the Local Plan.
616	3897	Mr Kevin Everitt [616]	Every development will increase carbon emissions with the increase use of vehicles. every new home must include solar panels and battery storage as a minimum requirement.	Comment	Though the Council acknowledges construction and development will add to carbon emissions in the District, Policies are set out in the Local Plan, which promote Carbon Net Zero in Homes and Buildings (PPL10a), as well as Embodied Carbon and Circular Economy in Homes and Buildings (Policy PPL10b). In addition to these policies, new renewable energy installations will help the District transition from fossil fuels to clean energy sources. Please see Chapter 7 for more information.
1315	3931	Mrs Kellie Tynan [1315]	The public transport provision is ok. But the 87 first bus can be very unreliable, it often doesn't turn up or runs late. The service is also slow and we need something more rapid. It is quicker and cheaper to drive into Colchester. Cyclist safety is not great it could be an option to ride a bike to alresford railway station but the road does not feel safe and there is not a secure place to leave a bike at alresford station.	Object	This representation is noted. The Council is currently updating its transport modelling to inform on where transportation infrastructure is required to support development. The Council will also continue to work with the relevant infrastructure providers and partners, such as Essex Highways, to secure the delivery of the necessary roads, public transportation, junctions and other projects.
1351	4008	Tom Moat [1351]	Be bold and include specific actions here.	Support	More specific actions with regard to climate change can be found in Chapters 3 and 7, and within each chapter are policies which address topics relating to carbon, water conservation, biodiversity and other issues relating to Objective 11.
1352	4030	Mrs Paula Bland [1352]	In my opinion this is unrealistic. Concreting over the agricultural land will do nothing to achieve this. Building more homes equals many more car journeys (that's reality) and EV are not the answer. There's still the manufacturing process, the generating of electricity and the disposal of the batteries none of which is 'green'.	Comment	The Council recognises concerns about the loss of agricultural land and the preference for development on brownfield sites. However, Tendring has a very limited supply of previously developed land, much of which has already been brought forward for development. As a result, and in order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this land is classified as best and most versatile agricultural land, which limits the ability to avoid such impacts.

					The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure.
581	4076	Mrs Sally Webb [581]	All new housing should be built to be as self sufficient as possible.	Support	Policy PPL10a sets out measures taken in homes and buildings to become more self-sufficient through operational energy and renewable energy sources. Please see Chapter 7 for more information.
1391	4264	Mrs Laurence Dewey [1391]	This needs to be tackled with common sense and long-term vision.	Comment	Noted. These policies are backed by the Council's Evidence Base found here.
529	4486	Mr Geoff Kurnatowski [529]	Construction is an industry with high carbon emissions. The cement industry alone produces about 8% of global carbon dioxide emissions. The brick industry is also a major source of carbon emissions. Materials for construction are often transported large distances producing large carbon dioxide emissions. Soil is a carbon "sink", but during construction the soil will be removed, causing oxidation of the organic matter and releasing more carbon dioxide. The removal of vegetation, and the reduced area of land for plant growth also has a negative impact on the environment and decreases the assimilation of carbon by plants.	Comment	These comments are noted. The Council acknowledges concerns with regard to the environment and agrees that protections must be in place to ensure new development is sustainable. Policy SPL3 outlines criteria that must be met by all new development and states that, *"during the construction phase, developers must comply with a 'considerate constructors' scheme' which employs reasonable measures and techniques to minimise and mitigate impacts and disturbance to neighbours and the existing wider community and any damage to public and private property."* In addition to the 'considerate constructors' scheme, SPL3 also requires that developments must not have unacceptable levels of pollution, and that the development, as well as its design, must respect or enhance the existing site features of landscape, ecological, heritage and amenity value.

Objective 11: Climate Change

Summary of Representations

Representations for Objective 11 were a mix of support, objections, and comments. The Environment Agency highlighted the Council's need to update the existing Strategic Flood Risk Assessment (SFRA). Frating Parish Council argued the proposed number of houses and commercial development will only increase carbon emissions, rather than mitigate the effects of climate change. Some members of the public echoed these concerns and argued the increase in traffic as well as the loss of greenfield land will contribute to worsened environmental outcomes. Some respondents showed support for Objective 11, agreeing that mitigating climate change is needed alongside the proposed developments. One respondent suggested considerations for climate-conscious development, such as blue and green design, decreasing the usage of asphalt and concreate in new builds, densifying development, and renewable energy installations. Other concerns noted throughout representations included wildlife deterioration, community integration, public transportation, affordable housing, traffic, and sustainable construction.

In response, no changes are required for Objective 11.

CHAPTER 3: SUSTAINABLE PLACES

Policy SPL1a: Presumption in Favour of Sustainable Development

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
823	13513	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Para 3.16 & 3.17 It is unclear which school types the figures in paragraph 3.16 relate to e.g. state mainstream, SEND and/or private? Whilst the figures in paragraph 3.17 match those in the May 2024 forecasts, they are mis-characterised as showing a rising trend. These figures do not include the impact of the proposals set out in the emerging Local Plan, but the primary figures dip mid period and secondary figures show decline. This should be updated in the Regulation 19 Plan and ECC can advise appropriate wording. Section 3, Para 3.27 p 27 It should be clarified that the reference to 'Hold the Line' relates to the preferred policy for Clacton and Holland on Sea in the Essex and South Suffolk Shoreline Management Plan (SMP) (2010). Section 3, Para 3.34 p 28 It is worth including mention that the Five Estuaries and North Falls Offshore Wind Farms will both be onshoring in Tendring District, between Frinton and Holland-on-Sea.	Comment	Noted. Paragraphs 3.16 and 3.17 have been updated to take account of figures within 'The Essex School Organisation Service's 10 Year Plan for Essex School Places 2026-2035 published in January 2026'.
1710	13620	National Grid (Kevin Roeton, Senior Consents Manager (Onshore Planning)) [1710]	In reviewing the Tendring Local Plan Regulation 18 Consultation we note that the Norwich to Tilbury Project is referenced in paragraph 3.35 of the consultation document, and it is beneficial to note that the Project has been considered in the development of the Local Plan. The Norwich to Tilbury Project will interact with the proposed draft allocation of two Local Green Spaces at 'Harwich Road Allotments' and 'Fishing Lake north of Colchester Road', and the rolling forward of an existing employment allocation at Crown Business Centre, Old Ipswich Road. We would offer our observations as follows and would welcome the opportunity to discuss further the interaction between the Norwich to Tilbury Project and the proposed allocations. Overhead electricity lines can be successfully co-located with development provided that the statutory safety clearances are maintained in accordance with the Electricity Safety, Quality and Continuity Regulations 2002. National Grid has produced its Design Guidelines for development near high voltage overhead lines, which set out these statutory safety clearances and provide detailed guidance for developers on how successful co-location can be achieved in practice. Accordingly, National Grid does not consider that the Norwich to Tilbury Project would adversely affect the delivery of the proposed site allocations, subject to the future development of those sites having full regard to this guidance. In this context, National Grid recommends that the policies relevant to these allocations explicitly reference the need to comply with both the Electricity Safety, Quality and Continuity Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage	Comment	Whilst these comments are noted, it is considered that there is not certainty in timing or delivery of the mentioned project. This therefore has the potential to create a Policy void where sites are not protected in the meantime.

			Overhead Power Lines, in order to facilitate successful development, should the Norwich to Tilbury Project Development Consent Order be granted.		
Businesses, Landowners and Developers					
136	4399	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	This Policy is totally consistent with the NPPF and is therefore supported.	Support	This is noted and the support is welcomed.
1638	4418	Lichfields (Amy Jones, Planner) [1638]	It is expected given preparation timescales for the LP that the Council will need to have regard to the draft NPPF to ensure that there is not inconsistency that would render the policies out of date. It is clear from draft NPPF that Government is seeking to limit the number of DM policies in LPs that go beyond national standards and which place significant burdens on applicants and Officers. There are policies that need to be re-drafted/deleted to avoid inconsistencies to ensure the council can take a positive and proactive approach in line with Policy SPL1a.	Support	Whilst these comments are noted, the Local Plan will be examined against the December 2024 version of the NPPF, rather than the updated version. Therefore, no further changes are needed to the policy to be in line with the most recently published NPPF.
1439	13869	Catesby Estates [1439]	Catesby support Draft Policy SPL1a as it aligns with the presumption in favour of sustainable development set out in the NPPF. The policy appropriately confirms that the Council will work proactively with applicants to find solutions so that development proposals can be approved where possible. This approach will help ensure that the Local Plan is positively prepared and consistent with national policy, while providing a clear and supportive framework for decision-making that facilitates sustainable development and timely delivery of growth.	Support	This is noted and the support is welcomed.
1643	14207	Bradfield Fruit Farm (Johnny Piper) [1643]	Our representation strongly relies on Policy SPL1a (Presumption in Favour of Sustainable Development), arguing that land at and adjacent to Bradfield Fruit Farm is the most sustainable and deliverable site in Bradfield. It states the site performs better environmentally, socially, and economically than the alternative Rose site, citing walkability, reduced carbon emissions, brownfield characteristics, efficient land use, and immediate deliverability. The representation contends that excluding the Fruit Farm conflicts with SPL1a and national policy, risks an unsound plan, and fails to prioritise genuinely sustainable development as required.	Support	We have reviewed and considered this representation, but the site was discounted as it was not keeping with the existing form of the settlement and would present an incongruous extension into the countryside.
1659	14289	Colne Medical Centre (Louise Weston, Assistant Practice Manager) [1659]	Furthermore, the proposal is inconsistent with NHS England guidance on sustainable primary care provision. The NHS Long Term Plan commits to improving access to primary care while reducing workforce pressures, yet this development would materially worsen both. The Core20PLUS5 framework also seeks to reduce health inequalities; however, increased delays in accessing GP services, medication, and emergency care would disproportionately disadvantage vulnerable populations within our community. In addition to the pressures on general practice, there are wider healthcare infrastructure concerns. Brightlingsea is served by a single, small pharmacy that is we are already struggling to meet the needs of the existing population. Patients frequently experience delays of up to a week for medications due to limited storage capacity and staffing constraints. The pharmacy premises cannot be expanded, and increased demand would likely exacerbate these issues, forcing more patients to travel outside the area for essential medicines.	Comment	Noted. The Council has decided that development in Brightlingsea (SAH4) be removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, it is suggested that two smaller sites are included within the urban area of Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea.
53	14372	M Scott Properties Ltd [53]	The presumption in favour of sustainable development clearly aligns with national policy and is therefore supported.	Support	This is noted and the support is welcomed.

982	14415	Turley (Claire Newbury, Associate Director) [982]	Policy SPL1a: Presumption in favour of sustainable development sets out a commitment that the Council will always work proactively with applicants to find solutions to secure development that improves the economic, social and environmental conditions of the area, which Catesby welcomes. In this respect, Catesby would welcome the Council's engagement in bringing forward the Plains Farm site, for sustainable development which Catesby believes meets all the relevant criteria.	Comment	This site has already been the subject of a previously refused planning application. Colchester City Council would be a key consultee in determining any future application because the site is more closely related to the urban area of Colchester than to any defined settlement in Tendring.
Community Representatives					
953	3471	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1110	3820	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We agree with the PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT, as long as it does not create harm to existing communities, especially in the Lawford area where we have seen a considerable housing growth, and it is vital to allocate the most appropriate sites that will deliver as much sustainability as possible.	Support	Noted.
244	13642	Ardleigh Parish Council (Ardleigh Parish) [244]	Ardleigh Parish Council recognises the need for a Local Plan that supports sustainable growth across Tendring District. This must balance economic development, housing needs, environmental protection, and infrastructure capacity. However, the Parish Council has significant concerns regarding the scale, location, and cumulative impact of proposed developments, particularly those affecting Ardleigh and its surrounding landscape.	Comment	Whilst these comments are noted, it is unclear what the emerging Local Plan can do to address these existing issues.
Members of the Public					
969	3580	Mr Scott Gilmour [969]	Good to approve developments that comply with the Plan. However depending on the context, there could be room for improvement/ Especially around frequent bus corridors and train stations. Doing this would further justify other investment that would benefit all residents through infrastructure upgrades and increasing transit frequency.	Support	The emerging Local Plan already recognises the benefits that good rail links can make to new development. Indeed, the Garden Village at Weeley and the large-scale development at Dovercourt both benefit form close proximity to railway stations.
976	3585	Ms Marianna White [976]	Building 300 homes in Brightlingsea is exactly against the policy and would be an unsustainable development in remote and poorly accessible locations. More houses, more traffic on the one road in/out would lead to detrimental air pollution, damage and cost of repair to the road, too many people for the resources available school, Dr, Pharmacist, Dentist etc. Plus access to work?!	Object	Noted. The Council has decided that development in Brightlingsea (SAH4) be removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, it is suggested that two smaller sites are included within the urban area of Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea.

1048	3687	Mrs Patricia Brooks [1048]	The overriding momentum is to build more houses - despite objections and comments from ECC Highways and residents. Policy must address local concerns before more housing are built.The roads and general infrastructure (school places,Dr's,dentists etc) are insufficient to support a larger local population. The aim to"minimise need to travel" ??- our friends moved [redacted] 2 years ago and cannot register with an NHS dentist here -5 year waiting list,so go back to Romford for the dentist. Current roads are frequently grid locked at peak times,even getting to and from rail stations is difficult.	Object	Concerns with regard to the housing numbers are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. With that being said, the Council has updated its Infrastructure Delivery Plan (IDP) and transport modelling to understand where facilities and services, such as roads and surgeries, are needed to support new development. The Council will continue to work with Essex Highways and the NHS/ICB to ensure these upgrades are delivered alongside growth.
752	3803	Mr Christopher Walpole [752]	The planned developments of three further garden suburbs on top of current development is really not sustainable in an area which is already greatly impacted by current developments , the huge development of 7500 homes in the area is going to be very difficult of manage in terms of sustainability and indeed it is likely to tip the scales considerably to an acute non sustainable scenario ' These government driven plans have been very badly thought through with a scattergun type approach as areas like Colchester and Tendring will with current plans struggle to reach any reasonable sustainable outcomes	Object	Though concerns with regard to local character surrounding the Garden Villages are noted, these are pivotal in the Council's ability to meet housing targets set by the Government. The Council is recommending the Local Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved. Garden Villages will have their own DPDs setting out the long-term vision for these settlements. This includes policies which will address active travel methods and the environment. Other policies in Chapter 7 of the Local Plan will mitigate adverse development impacts.
616	3915	Mr Kevin Everitt [616]	Development of MSA24 and MSA25 will not improve the economic, social and environmental conditions in the area. These developments are contrary to the designation of Weeley Heath being a smaller rural settlement as recognised by Tendring council and the Secretary of State when previous applications for MSA24 have been refused and rejected on appeal. Weeley Heath still retains the smaller rural settlement consideration under the new plan.	Object	Concerns with regard to the housing numbers are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development. The majority of settlements within Tendring will see some level of growth and it is considered that the growth in Weeley Heath is proportionate to the size of the settlement.
1350	4009	Prof Mark Lowdell [1350]	The definition of "sustainable development" does not include sustainability of roads/rail infrastructure at levels commensurate with the increased activity.	Object	Whilst not specifically addressed in Policy SPL1a, sustainable road and rail infrastructure is discussed in Chapter 8 of the Local Plan. These policies are supplemented by transport modelling, which will inform on the necessary upgrades to rail and road infrastructure required to support development.
1352	4029	Mrs Paula Bland [1352]	Let's hope that you can achieve this as without it our lives will be impossible.	Comment	Noted.

581	4079	Mrs Sally Webb [581]	There is no room for expansion in Tendring, it is understood that the Council have to make this provision, but it is not appropriate to push housing on an already saturated area.	Object	Concerns with regard to local character are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
1385	4233	Mrs Monica Kurnatowska [1385]	Many of the sites do not meet the sustainable development objective. For example Wrabness is not a sustainable site given lack of local employment, no bus service, infrequent train service and absence of key services in the villable etc leading to increased car dependency. Allocating 30 dwellings in a settlement without core services does not align with the Plan's objective of reducing reliance on car travel and siting development in places where essential services can be accessed on foot. Growth should instead be focused on existing towns designed to provide infrastructure	Comment	Due to the increase in housing targets set by Central Government, the Council is required to identify sufficient sites to accommodate the mandatory increase in housing provision. Where this growth will proportionately occur is set out in Strategic Policy SPL1: Managing Growth, where your concerns regarding key services, traffic, transportation, employment and infrastructure are considered. It is inevitable that new infrastructure will be required to support these developments and the communities they will serve. Developers will be expected to contribute towards the provision of necessary infrastructure. This will include contributions towards both on-site infrastructure and strategic off-site infrastructure improvements. Such contributions will be secured through Section 106 agreements under the Town and Country Planning Act 1990 (as amended) and/or through the Community Infrastructure Levy (CIL), where applicable.
529	4247	Mr Geoff Kurnatowski [529]	Many of the sites do not meet the sustainable development objective. For example Wrabness is not a sustainable site given lack of local employment, no bus service, infrequent train service and absence of key services in the village etc leading to increased car dependency. Allocating 30 dwellings in a settlement without core services does not align with the Plan's objective of reducing reliance on car travel and siting development in places where essential services can be accessed on foot. Growth should instead be focused on existing towns designed to provide infrastructure	Object	Though Officers accept that housing developments in smaller rural villages, such as Wrabness, are generally less sustainable than sites allocated within or around Strategic Urban Settlements, Smaller Urban Settlements and Rural Service Centres, the Council has chosen to take an approach that includes a variety of sites in different locations to meet the Government's ambitious housing targets. As the Council understands there are fewer job opportunities, infrastructure facilities, and services in Wrabness, this particular smaller rural settlement has been allocated fewer homes relative to other settlements within the hierarchy.
1391	4266	Mrs Laurence Dewey [1391]	4000 new homes cannot be qualified as "sustainable". It is overwhelming, more than doubling the size of existing settled communities.	Comment	Concerns with regard to the housing numbers are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
571	4415	Mrs Sian Savage [571]	The Neighbourhood Plan for Brightlingsea only supports affordable housing, housing for an ageing population and sustainable, eco-friendly housing as evidenced in the Housing Needs Assessment.	Comment	The Brightlingsea Neighbourhood Plan has not been through public consultation, examination or adoption by the Council so can be given no weight at this stage.
1495	14180	Martine Ward [1495]	Proposed gravel pits across the district pose serious environmental and health concerns. Gravel extraction produces fine particulate dust (PM10 and PM2.5), diesel emissions, and continuous HGV movements. These activities worsen air quality and increase respiratory risks for vulnerable residents. Extraction also removes natural ground layers that absorb rainfall, increasing surface runoff and contributing to flooding.	Comment	This is a County matter and, in any event, these kinds of applications are accompanied by environmental reports and studies which address such matters.

			The Neighbourhood Plan must include policies to protect air quality, soil integrity, and local habitats.		

Policy SPL1a: Presumption in Favour of Sustainable Development

Summary of Representations

Policy SPL1a received a mixture of support, objections and wider comments. A number of developers and land interests supported the policy on the basis that it is consistent with the National Planning Policy Framework and provides a positive basis for decision-making by confirming that the Council will work proactively with applicants to secure sustainable development. Several representations also welcomed the principle of approving development that accords with the Local Plan, with some suggesting that sustainable development should be particularly focused around public transport corridors, railway stations and locations where infrastructure investment can be justified.
Technical stakeholders provided comments on related matters, including education forecasts, shoreline management, offshore wind projects and the relationship between proposed allocations and electricity infrastructure. Essex County Council advised that references to school projections and shoreline management should be clarified and updated, while National Grid highlighted the need for future development near proposed overhead line infrastructure to have regard to statutory safety requirements and relevant design guidance.

Other respondents raised concerns that elements of the Local Plan, or particular site allocations, would not represent sustainable development in practice. These concerns focused on the scale and location of housing growth, pressure on existing roads and healthcare services, the capacity of schools, pharmacies and other local facilities, impacts on rural character, and the potential for increased car dependency in settlements with limited public transport or local employment opportunities. Specific concerns were raised in relation to Brightlingsea, Weeley Heath, Wrabness, Bradfield Fruit Farm, Plains Farm and wider Garden Village proposals. Some representations argued that growth should be directed towards more sustainable towns and settlements with stronger existing infrastructure.

In response, changes have been made to the supporting text of Policy SPL1a to reflect forecast data from Essex County Council with regard to school places. No changes have been made to the policy wording. The Council has updated the Infrastructure Delivery Plan and transport modelling in support of the Submission Version of the Local Plan and will continue to work with the relevant infrastructure providers as appropriate.

Policy SPL1: Managing Growth

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
926	3842	National Landscape Office (Beverley McClean, National Landscape Planning Officer) [926]	Manningtree, Lawford and Mistley are all situated in the setting to the Dedham Vale and Suffolk & Essex National Landscapes. In accordance with the NPPF (current and emerging), the scale, location and design of any new development coming in the setting must take into account impacts on the natural beauty of the Designated Landscapes. The NPPF (current and emerging) are both clear that major development should be limited, and this should be reflected in the level of growth being proposed in these areas.	Comment	These comments are noted and this is considered more fully in policies PPL3 and SPL3.
926	3843	National Landscape Office (Beverley McClean, National Landscape Planning Officer) [926]	Bradfield, classed as a small rural settlement is situated in the setting to the Suffolk & Essex Coast & Heaths National Landscape. The current and emerging NPPF is clear that development coming forward in the setting to a Designated Landscape should be carefully sited and designed to avoid impacts on the designated area. The current and emerging NPPF states that major development should be limited within National Landscapes. The allocation of a larger site within Bradfield will need to consider impacts on natural beauty to help demonstrate compliance with the S85 Seek to Further Duty	Comment	These comments are noted and this is considered more fully in policies PPL3 and SPL3.
349	4288	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	The ICB is supportive of this approach as in general the most accessible and sustainable locations will have established health infrastructure already, and therefore meeting the population growth should be easier. It should be noted that there are locations that will need additional consideration due to existing health infrastructure challenges such as restraints on a certain buildings, long term leases, or other factors that make strategic planning for growth difficult. The NHS 10-Year Plan aims to provide more health services in communities and this will require a strategic change for health facilities and where services are provided from outside of the acute setting. TDC needs to be aware that not all services can be provided locally due to capital and ongoing revenue cost implications. However, the ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. Support for residents in these areas need to be provided through public transport and provision of safe cycling routes. Encouraging economic growth close to where people live should include access to superfast broadband. Emergency services and visiting health/social staff are becoming more reliant on access to digital technology when working remotely.	Comment	Noted.
1335	4364	Affinity Water Ltd [1335]	Clacton and Manningtree are suitable settlements for additional development because of the range of services and facilities they provide, and that they are accessible by public transport. No changes are required to the settlement hierarchy in Policy SLP1 in respect of Clacton and Manningtree.	Support	This is noted and the support is welcomed.

6	13454 duplicate rep 13468 deleted	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water recognises that the Council needed to review the spatial strategy for growth in order to accommodate the uplift in growth in order to comply with the Government's new mandatory housing targets. It is noted that the Plan needs to address growth of just over 18,000 new homes up to 2042. Around 10,700 of these homes are expected to be delivered through existing commitments and homes that are anticipated to come forward through windfall development. Existing commitments will have the benefit of planning consent, and the right to connect to our network, unless specific conditions are attached with specific measures in place. The spatial strategy for the plan therefore proposes to locate additional growth (7,300+ homes) to meet the housing requirement, in the Strategic Urban Settlements, including Clacton-on-Sea, Harwich and Dovercourt, and Colchester – namely the Tendring and Colchester Borders Garden Community (TCBGC). The plan also proposes three new Garden Villages that will total 10,000 homes, as a result of land and infrastructure constraints in other areas. These new settlements will continue to deliver homes beyond the plan period and must be supported by new infrastructure. As we advised previously, by factoring in opportunities to mitigate climate change and the capital (embodied) carbon associated with new development, infrastructure should be provided on the basis that it provides significant carbon efficiencies in terms of the quantum of development it supports. Our own analysis indicates that where investment is required to deliver our infrastructure to support growth, then a development of at least 2,000 dwellings (equating to approximately 5,000 population equivalent) or more could generate up to 10 times the carbon efficiencies than development sites delivering a lower quantum of growth - supporting the delivery of strategic growth areas, and garden communities. Smaller rural settlements: It is noted that additional smaller settlements have been added to this policy. Most of these are within existing water recycling centre (WRC) catchments, but locations such as Tendring Heath are not served by the public sewer system and therefore any new homes would need alternative wastewater treatment facilities such as package treatment plants. We previously identified that Little Bromley and Tendring Village, are not served by a public sewer network, and settlements such as Little Bentley is served by a small WRC with a descriptive permit, meaning that it is not designed to accommodate incremental growth. We would consider that these should be treated as 'open countryside' with no additional growth directed to these locations if it is dependent on connecting to the public sewer network as there is a risk that incremental housing growth within or close to the WRC catchment could exceed the capacity of these small WRCs and potentially cause environmental harm. It is therefore important that policies in the Local Plan have suitable wastewater treatment requirements, whether connecting to existing public sewer networks or for alternative provision.	Comment	Protected Places policies will make it clear that adequate wastewater infrastructure should be provided. In the case of smaller developments in these locations, they will need to provide alternative facilities – which has been the case with previous planning applications in these areas. It is therefore considered that these villages should not be removed from the settlement hierarchy.
1654	13485	Natural England (Jonathan Burt) [1654]	The whole of Tendring District Council (TDC) is within the Zone of Influence (ZoI) for the Essex Coast Habitats Sites. As such, new housing within TDC will add to recreational pressure on the Essex Coast Habitats Sites (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites), and land earmarked for development may additionally be Functionally Linked Land (FLL),	Comment	Whilst these points are dealt with in more detail elsewhere in the Plan, it is considered that mitigation already exists through the RAMS project and at application stage through the preparation of HRA and AAs.

			i.e. land outside the SPAs, but which forms foraging and/or roosting habitat of high importance to the maintenance of the bird populations for which the Habitats Sites are designated. Both the level of recreational pressure generated by new housing developments and the likelihood of development land being FLL increase nearer to the coast. Consequently, we would advise allocating as much housing development as possible away from the coast.		
823	13510	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Consider the following beneath SPL1 supporting text (Section 3 acknowledges strategic roads and dispersed geography, this ties distribution to sustainable access rather than road capacity alone): • Make reference to reducing car dependency (existing LTP3 and proposed LTP4's emphasis). • In identifying capacity within each tier, the Council will have regard to public transport accessibility and the deliverability of active travel networks identified in ECC Local LCWIPs, with growth phased against IDP transport schemes including A120/A133 packages and Rapid Transit corridors. • Garden Villages (GV) (Hare Green, Horsley Cross, Weeley): Significant infrastructure is required in all three Garden Villages. Early safeguarding of RTS corridors, mobility hubs, and permeable LCWIP spines connecting to rail stations/bus corridors, and parking restraint near centres. Proposed policy strengthening (in GV narrative): Each Garden Village will: - safeguard and deliver RTS -ready corridors; - provide mobility hubs at neighbourhood centres; - deliver LTN 1/20 compliant cycle spines and safe walking networks integrated with County/district LCWIPs; and - apply context-based parking restraint in accessible locations per EPOA Parking Guidance." • Freeport East and Bathside Bay - include freight routing and lorry parking principles to protect sensitive streets and enable zero-emission last-mile where feasible.	Comment	The Council notes Essex County Council's comments regarding the inclusion of additional references to reducing car dependency, public transport accessibility, active travel infrastructure, Garden Village transport measures and freight routing principles within the supporting text to Policy SPL1. However, the Council does not consider these amendments necessary or appropriate within the context of Policy SPL1. Policy SPL1 is a strategic policy which establishes the overarching spatial strategy for growth across the District and explains how development is distributed through the Settlement Hierarchy. The policy is concerned with the broad principles of growth management and the relationship between the scale and location of development and the hierarchy of settlements. The supporting text to Policy SPL1 explains the strategic considerations that have informed the Settlement Hierarchy and overall distribution of growth. It is not intended to set out detailed transport requirements, infrastructure schemes or site-specific mitigation measures. The introduction of such detail within this section would be disproportionate and inconsistent with the purpose of a strategic spatial policy. Detailed transport policies, infrastructure requirements and measures to encourage sustainable travel are addressed elsewhere within the emerging Local Plan, particularly within Chapter 8: Connected Places. This chapter considers transport infrastructure, public transport provision, active travel measures and wider connectivity objectives, providing the appropriate policy framework for these matters. The Infrastructure Delivery Plan (IDP) also identifies the infrastructure necessary to support planned growth and provides the mechanism for considering the delivery and phasing of strategic transport schemes. Similarly, the detailed design and infrastructure requirements associated with the proposed Garden Villages are addressed through the relevant site-specific policies and supporting text within Chapter 9 and through the IDP. Matters such as rapid transit corridors, mobility hubs, cycle and pedestrian networks, parking provision and other transport interventions are more appropriately considered through those policies, masterplanning and subsequent planning applications rather than through Policy SPL1. The Council therefore considers that the suggested additions would introduce an unnecessary level of detail into a strategic policy whose primary purpose is to establish the spatial distribution of growth across the District.
823	13516	Essex County Council (Rich Cooke, Principal	Section 3, Strategic Urban Settlements Para 3.46 It should be noted that the 5 Estuaries offshore wind farm (which recently received planning approval) will be onshoring between Frinton and Holland-on-Sea.	Comment	Whilst the comments are noted it is considered that some of these points are for future consideration and will be considered at the next iteration of the Local Plan.

		Spatial Planner) [823]	Section 3, Para 3.47 p 31 It is noted that both Jaywick Sands and Holland on Sea areas are classified as Strategic Urban Settlements. Whilst the Shoreline Management Plan has a preferred policy of Hold the Line, it does note that the standard of protection may be modified over time, and this should be considered when determining appropriate use of these areas. For Holland Haven, the preferred policy for the longer term has not yet been agreed and is 'pending agreement' so the intent of management here is not clear. Section 3, Smaller Urban Settlements Para 3.55 Some of these settlements are at potential risk of coastal change over the next 100 years and TDC (together with the EA) should assess the significance of this risk and whether the designation of any Coastal Change Management Areas would be appropriate. The guidance for Coast Change Management Aras (CCMAs) is for anywhere that has a Managed Realignment Policy, or at risk of significant risk of coastal erosion or permanent inundation. Informal initial indications from the EA have suggested that CCMAs could be located in Walton on the Naze, Hamford Water, Point Clear and Wrabness. Section 3, Smaller Rural Settlements: Para 3.64 Page 34 & 35 Agree - The long-term viability of under subscribed small rural schools will be enhanced by additional family housing in their areas.		However, signposting to Coastal Change Management Areas can be included within this supporting text.
148	14464	Environment Agency (Environment Agency) [148]	A new Strategic Flood Risk Assessment (SFRA) using updated flood risk and climate change datasets should inform future growth locations. While some areas face risk from coastal, estuary, watercourse and surface water flooding, many remain low risk. Updated Flood Map for Planning data, including Environment Agency NaFRA2 outputs, has altered flood zone extents, especially along smaller watercourses. NaFRA2 also provides updated climate change mapping to support the Sequential Test and identify where Level 2 SFRA may be needed. Given updated UKCP18 climate allowances and similar updates by neighbouring authorities, the 2017 SFRA is now outdated and unsuitable without revision.	Comment	An update to the SFRA has already been produced and will be available for the next round of public consultation.
Businesses, Landowners and Developers					
609	3834	Hills Building Group [609]	The settlement hierarchy should categorise and rank settlements based on size, economic role and the range of services/facilities, ensuring development reflects the relative sustainability of the settlements. Although this policy, which seeks to set a settlement hierarchy is supported in principle, concern is raised in relation to the order identified which places the proposed garden villages higher than the Smaller Urban Settlements and the Rural Service Centres. Incorrectly identifying settlements within the hierarchy could lead to prioritising development at less sustainable locations, therefore the settlement hierarchy should be amended to place the proposed garden villages lower down the settlement hierarchy.	Object	Whilst these comments are noted it is considered that the settlement hierarchy as drafted gives a clear and precise range of settlement types and is considered that no further changes to its order are required.

1215	3904	Pigeon [1215]	The settlement hierarchy in draft Policy SLP1 is supported in so far as it relates to the identification of Clacton as a Strategic Urban Settlement.	Support	This is noted and the support is welcomed.
1002	3959	George Thompson Limited [1002]	Our client supports the proposed Spatial Strategy set out in Strategic Policy SPL1 and its decision to allow a small-scale increase in housing stock at many of the District's Smaller Rural Settlements. This will help to meet local housing needs, provide young people with greater opportunity to buy or rent homes in the communities they grew up in, support existing local shops, services and businesses through increased expenditure, and enhance the vitality and vibrancy of these communities.	Support	This is noted and the support is welcomed.
705	4045	Mr Peter Le Grys [705]	Opposed to new free standing town within the district. Based on the plans available to date. the Elmstead neighbourhood will be neither a garden community or a village. The schemes suggested are wholesale changes to the rural nature of the district.	Object	The representation is noted. The Garden Village proposals are intended to deliver new communities in accordance with recognised Garden City principles, including high-quality design, green infrastructure, accessible services and facilities, and opportunities for sustainable travel. Whilst the developments would constitute new settlements within the countryside, the Local Plan seeks to ensure they evolve as well-planned, self contained communities rather than conventional urban extensions. No modification is proposed.
705	4053	Mr Peter Le Grys [705]	Fox Street is hardly a sustainable settlement. A recent appeal decision within Colchester City has stated that Fox Street cannot be regarded as a settlement given its absence of facilities and alternative modes of transport.	Object	Comments noted, it is considered that the location of Fox Street with its close proximity to Colchester and other settlements will allow future residents to access services.
705	4055	Mr Peter Le Grys [705]	Lanswood Park should consider an extension to include the land to the north of Beth Chatto and Bottles Hall given the character of the area and employment opportunities.	Object	Comments are noted, however it is considered that this land would be an intrusion into the countryside and would not be in keeping with scale and pattern of development. Should this land be developed, this would lead to urban sprawl, with a non defendable boundary.
705	4058	Mr Peter Le Grys [705]	I proposed the reinstatement of Point Clear as a settlement based on 3 appeal decisions that I achieved. Given the scale and facilities within the community, this has far more opportunities than most other smaller settlements.	Support	Noted, this change has been made.
705	4186	Mr Peter Le Grys [705]	The (Fox Street) settlement has no facilities or amenities and should not be considered as a defined settlement.	Object	Comments noted, it is considered that the location of Fox Street with its close proximity to Colchester and other settlements will allow future residents to access services.
1336	4312	Pigeon [1336]	It is appropriate for Alresford to be defined as a Rural Service Centre based on the range of services and facilities it provides. Alresford is a suitable settlement for additional development because it has a railway station and has bus services. No changes are required to the settlement hierarchy in Policy SLP1 in respect of Alresford.	Support	This is noted and the support is welcomed.
1406	4344	The MacDonald Family (Ravens Green) [1406]	Our clients support the proposed Spatial Strategy set out in Strategic Policy SPL1 and its decision to identify three new Garden Villages (including at Hare Green) in the central parts of the District. These new Garden Villages have the capacity to: address a significant proportion of the District's housing and employment needs up to 2042 and beyond; deliver key infrastructure; and in doing so, help to preserve the character and setting of the District's main towns and villages.	Support	This is noted and the support is welcomed.
1409	4357	The MacDonald Family (Frating) [1409]	Our clients support the proposed Spatial Strategy set out in Strategic Policy SPL1 and its decision to identify three new Garden Villages (including at Hare Green) in the central parts of the District. These new Garden Villages have the capacity to: address a significant proportion of the District's housing and employment needs	Support	This is noted and the support is welcomed.

			up to 2042 and beyond; deliver key infrastructure; and in doing so, help to preserve the character and setting of the District's main towns and villages.		
1422	4393	M Scott Properties Ltd (Scott Properties) [1422]	Policy SPL1: Managing Growth appropriately recognises that the overall spatial strategy for growth across the District should be underpinned by a Settlement Hierarchy. The principle of the spatial strategy incorporating New Garden Villages with Horsley Cross Garden Village (Policy SAMU9), recognises their importance in the hierarchy and is supported. The Council acknowledges that outside of Clacton, Harwich and the Tendring Colchester Borders Garden Community, the potential for other towns and villages in Tendring to expand is constrained. The new Garden Village of Horsley Green will facilitate growth and is supported which aligns with paragraph 8 of the NPPF 2024.	Support	This is noted and the support is welcomed.
136	4400	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	This Policy effectively rolls forward the existing Policy in the adopted Local Plan but adds the additional areas in the Preferred Options document that are proposed to contribute towards meeting future development needs. The existing hierarchy has proved to be sound and it is logical and effective to add the existing committed Garden Community and proposed new Garden Villages (including Weeley Green Garden Village) and newely identified Smaller Rural Settlements.	Support	This is noted and the support is welcomed.
1638	4419	Lichfields (Amy Jones, Planner) [1638]	Our client agrees with the Council's recognition that Kirby Cross is suitable for a proportionate amount of additional development, which can be delivered on the land north of Thorpe Road.	Comment	Noted.
431	4440	Welbeck Strategic Land [431]	Delete the 3 Garden Villages and classify Great Bentley as a Smaller Urban Settlement.	Object	Though concerns with regard to the local character surrounding the Garden Villages are noted, these are pivotal in the Council's ability to meet housing targets set by the Government. The Council is recommending the Local Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved. Garden Villages will have their own DPDs setting out the long-term vision for these settlements. This includes policies which will address active travel methods and the environment. Other policies in Chapter 7 of the Local Plan will mitigate adverse development impacts. Additionally, it is considered that the settlement hierarchy as drafted gives a clear and precise range of settlement types and is considered that no further changes to its order are required
853	6977	Taylor Wimpey [853]	We suggest that the new "Garden Communities and Garden Villages" tier in Strategic Policy SPL1 is premature and should be removed from the policy text, with the issue dealt with in supporting material.	Comment	Whilst these comments are noted it is considered that the settlement hierarchy as drafted gives a clear and precise range of settlement types and is considered that no further changes to its order are required.
828	13633	Welbeck Strategic Land IV LLP [828]	Whilst we do not object to the principle of this policy in setting out the proposed settlement hierarchy, we do object to the Council's proposed spatial strategy and distribution of growth. We object to the Council's proposed spatial strategy as it places too much reliance on new settlements and strategic urban extensions to help meet its needs over the plan period.	Comment	The new Garden Villages are pivotal in the Council's ability to meet housing targets set by the Government. The Council is recommending the Local Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved. Garden Villages will have their own DPDs setting out the long-term vision for these settlements. This includes policies which will address active travel methods and the environment. Other policies in Chapter 7 of the Local Plan will mitigate adverse development impacts.

					Additionally, it is considered that the settlement hierarchy as drafted gives a clear and precise range of settlement types.
1694	13650	McNair Ltd [1694]	Policy SPL1 sets out a proposed settlement hierarchy for the District. Bradfield is identified as a 'smaller rural settlement'. Bradfield is a village with a population of 1,253 according to the 2021 Census. The village benefits from a strong sense of place and a clearly defined village character, supported by a low-density settlement pattern typical of sustainable rural communities. Bradfield does however contains a well-established range of community and services and facilities to meet the day to day needs of residents, such as a village hall, Primary school and nursery, recreation ground, public house and restaurant/café, post office and shop. The village is also served by the 104, 102, and 06 bus services. These provide regular bus services to nearby villages and towns, including Mistley railway station (the nearest at 3.5km), Warbness railway station and Manningtree train station. These connections enable access to employment, education and a wider range of facilities. Bradfield also has a holiday park which provides a location for tourism which is important to the local economy. Taken together, Bradfield's existing facilities and transport links indicate that it functions as a sustainable rural settlement capable of accommodating an appropriate level of growth in accordance with local and national planning policy. Moreover, sustainable housing growth in Bradfield is important in order to help maintain the vitality and viability of existing local services such as the post office, public house and primary school and nursey. The Draft Local Plan sought to allocate 100 homes in Bradfield in one allocation, located to the land south of Windmill Road and east of Straight Road. While we support growth directed to Bradfield, it is considered that the Mill Lane site is a more suitable and sustainable location to accommodate further growth through and so should also be considered for allocation. It is important to recognise that an over-reliance on a limited number of strategic, large-scale site allocations introduces delivery risks, including lengthy lead-in periods, complex land assembly, significant infrastructure requirements and extended build-out times, all of which can delay housing delivery, particularly in the early years of the plan period. By contrast, smaller and more agile sites, such as land north of Mill Lane, are capable of being brought forward more quickly, often with fewer infrastructure dependencies and greater flexibility in delivery helping to reinforce housing supply. These sites can also play a crucial role in supporting early housing delivery, reducing reliance on later-stage strategic sites, and ensuring a steady and reliable supply of homes in the first five years of the housing trajectory. Bradfield is considered capable of sustainably accommodating additional housing growth delivered through a balanced mix of site sizes and locations. This approach would enable development to be integrated sensitively to the existing	Comment	This representation is noted; however, the Council have provisionally suggested the reduction of dwellings on site MSA9 from 100 to 20. This will significantly reduce impacts on local infrastructure. This change was to better reflect the character of the settlement.

			settlement, maintaining the village character and responding appropriately to infrastructure capacity. Accordingly, we strongly advocate for the identification and allocation of an additional, deliverable site, adjacent to the settlement such as the site at Mill Lane. This would provide flexibility, support early and sustained delivery, and help ensure that the Local Plan is effective, positively prepared and fully aligned with national policy objectives to significantly boost housing supply.		
726	13651	A H Brown Farms [726]	Policy SPL1 sets out a proposed settlement hierarchy for the District. Great Holland is identified as a 'smaller rural settlement'. Great Holland is one of the most sustainable smaller rural settlements. Great Holland is a village with a population of 509, according to the 2021 Census. The village benefits from a strong sense of place and a clearly defined village character, supported by a settlement pattern typical of sustainable rural communities. Great Holland itself is a sustainable village and comprises various amenities and services. Kirby Cross is just north of Great Holland, and at a walkable distance via the B1032. Kirby Cross has a wide range of services and facilities, including schools, Doctors and shops. From the Site, there is a pavement the full distance to Kirby Cross, which provides access to the train station. There are several schools within 2 miles of the Site, many of which within Kirby Cross and Frinton-on-Sea. Great Holland is an established community with its own identity. Unlike a number of other settlements Great Holland has not been subject to any significant growth in recent years. Westbury Road and Great Holland Green bus stops are within 0.2 miles from the Site, providing regular bus services to Walton-on-the-Naze, Clacton and Frinton-on-Sea. Kirby Cross rail station is 1 mile from the site, providing direct services to Colchester, Wivenhoe, Great Bentley, Frinton-on-Sea, Walton-on-the-Naze, and beyond into London. Taken together, Great Holland's existing facilities and transport links indicate that it functions as a sustainable rural settlement capable of accommodating an appropriate level of growth in accordance with local and national planning policy. The Draft Local Plan sought to allocate 20 dwellings in Great Holland, across two allocations, including the Land East of Kirby Road. We support the decision to allocate growth to Great Holland, however, we consider the site is capable of accommodating a higher proportion of dwellings, which would support early housing delivery, reducing reliance on later-stage strategic sites, and ensuring a steady and reliable supply of homes within Great Holland and the wider Tendring area during the first five years of the housing trajectory.	Comment	Whilst this representation is noted, housing allocations within the Local Plan have been assessed based on infrastructure, environmental constraints, retail/ job opportunities, and other factors. The sites in Great Holland have been appropriately assessed through the robust evidence base and allocated a proportionate amount of housing based on the characteristics of the settlement. The Council has chosen an approach to development which disperses housing across the District so that new housing targets set by the Government can be met.
726	13654	A H Brown Farms [726]	The Site is located to the east of Rush Green Road, south west of Clacton-on-Sea and north east of Jaywick. The site comprises approximately 12 hectares of agricultural land and can bring forward 250-300 dwellings. Policy SPL1 sets out a proposed settlement hierarchy for the District. Clacton-on-Sea is identified as a 'strategic urban settlement', defined in paragraph 3.46 as:	Comment	Sites in or near Clacton-on-Sea have been excluded from further consideration because: Significant development is already allocated or underway within the area, including: ~1,700 homes at Hartley Gardens

			Strategic Urban settlements have the largest existing populations and areas of economic activity along with the widest range of existing infrastructure and facilities, making them the most sustainable locations for potential future growth. These settlements provide better opportunities for the use of public transport, walking and cycling to get from place to place and, because they have established town centres, employment areas and infrastructure, they provide locations where, with the right action, it is possible to create a significant number of additional new jobs and deliver sustainable – and which can assist in addressing local issues of deprivation. Clacton-on-Sea is a town located with a population of 53,766 people, located to the east of Jaywick and south west of Walton-on-the-Naze. Clacton is a very sustainable location with a wide range of services and facilities, including shops, cafes, restaurants, hotel accommodation, West Cliff Theatre, schools, Clacton and District Hospital and other facilities. Clacton benefits from a train station which provides regular rail services to London Liverpool Street, Stratford (London), Romford, Shenfield, Ingatestone, Chelmsford, Witham, Colchester, Hythe, Wvenhoe, and Thorpe-le-Soken. Clacton also has regular bus services that provide routes to Clacton Pier, Jaywick, Bockings Elm, St Osyth, Great Bentley, Thorrington Cross and Brightlingsea. Taken together, Clacton's existing facilities and transport links indicate that it functions as the most sustainable settlement in the District and it should be the focus for growth in accordance with local and national planning policy. The existing and proposed allocated sites in Clacton relate to strategic sites and garden villages, which will required significant infrastructure constraints. In order to provide choice and competition for market land and to boost housing supply, it is considered critical that the land to the east of Rush Green Road is allocated as a medium sized site to deliver growth in the short to medium term. It is important to recognise that an over-reliance on a limited number of strategic, large-scale site allocations introduces delivery risks, including lengthy lead-in periods, complex land assembly, significant infrastructure requirements and extended build-out times, all of which can delay housing delivery, particularly in the early years of the plan period. By contrast, medium sized sites, such as the land to the east of Rush Green Road, are capable of being brought forward more quickly, often with fewer infrastructure dependencies and greater flexibility in delivery helping to reinforce housing supply. These sites can also play a crucial role in supporting early housing delivery, reducing reliance on later-stage strategic sites, and ensuring a steady and reliable supply of homes in the first five years of the housing trajectory. Clacton is considered a highly sustainable location for accommodating additional housing growth. Accordingly, we		This area is expected to contribute substantially to housing delivery through to 2041. Both the housing market in general and existing services and infrastructure in these areas are unlikely to be able to absorb any additional growth over and above the already substantial growth planned for through to 2041.

			strongly advocate for the identification and allocation of an additional, deliverable site, adjacent to the settlement such as the site at Rush Green Road. This would provide flexibility, support early and sustained delivery, and help ensure that the Local Plan is effective, positively prepared and fully aligned with national policy objectives to significantly boost housing supply.		
726	13657	A H Brown Farms [726]	Policy SPL1 sets out a proposed settlement hierarchy for the District. Great Holland is identified as a 'smaller rural settlement'. Great Holland is one of the most sustainable smaller rural settlements. Great Holland is a village with a population of 509, according to the 2021 Census. The village benefits from a strong sense of place and a clearly defined village character, supported by a settlement pattern typical of sustainable rural communities. Great Holland itself is a sustainable village and comprises various amenities and services. Kirby Cross is just north of Great Holland, and at a walkable distance via the B1032. Kirby Cross has a wide range of services and facilities, including schools, Doctors and shops. From the site, there is a pavement the full distance to Kirby Cross, which provides access to the train station. There are several schools within 2 miles of the site, many of which within Kirby Cross and Frinton-on-Sea. Great Holland is an established community with its own identity. Unlike a number of other settlements Great Holland has not been subject to any significant growth in recent years. Great Holland Green and Baptist Church bus stops are within 0.1 miles from the site, providing regular bus services to Walton-on-the-Naze, Clacton and Frinton-on-Sea. Kirby Cross railway station is 1 mile from the site, providing direct rail services to Colchester, Wivenhoe, Great Bentley, Frinton-on-Sea, Walton-on-the-Naze, and beyond into London. Taken together, Great Holland's existing facilities and transport links indicate that it functions as a sustainable rural settlement capable of accommodating an appropriate level of growth in accordance with local and national planning policy. The Draft Local Plan sought to allocate 20 dwellings in Great Holland, across two allocations (Land East of Kirby Road and Land West of Main Road). While we support growth directed to Great Holland, it is considered that this is a sustainable location which could accommodate further growth through another smaller scaled allocation, adjacent to the two draft allocations. It is important to recognize that an over-reliance on a limited number of strategic, large-scale site allocations introduces delivery risks, including lengthy lead-in periods, complex land assembly, significant infrastructure requirements and extended build-out times, all of which can delay housing delivery, particularly in the early years of the plan period. By contrast, smaller and more agile sites, such as Land East of Kirby Road, are capable of being brought forward more quickly, often with fewer infrastructure dependencies and greater flexibility in delivery. These sites can therefore play a crucial role in supporting early housing delivery, reducing reliance on later-stage strategic sites, and ensuring a steady and reliable supply of homes within Great Holland and the wider Tendring area during the first five years of the housing trajectory.	Comment	Whilst this representation is noted, housing allocations within the Local Plan have been assessed based on infrastructure, environmental constraints, retail/ job opportunities, and other factors. The sites in Great Holland have been appropriately assessed through the robust evidence base and allocated a proportionate amount of housing based on the characteristics of the settlement. The Council has chosen an approach to development which disperses housing across the District so that new housing targets set by the Government can be met.

			Great Holland is considered capable of sustainably accommodating additional housing growth. This approach would enable development to be integrated sensitively to the existing settlement, maintaining the village character and responding appropriately to infrastructure capacity. Accordingly, while we support in principle development in Great Holland, we strongly advocate for the allocation of an additional, deliverable site, adjacent to the draft allocations. This would provide flexibility, support early and sustained delivery, and help ensure that the Local Plan is effective, positively prepared and fully aligned with national policy objectives to significantly boost housing supply.		
853	13667	Taylor Wimpey [853]	Due to the large scale nature of these allocations, the delayed delivery of one or more of the sites would have substantial impacts on the ability of TDC to meet targets. On this basis (and in conjunction with the reliance on a number of previously consented developments), TDC should identify and allocate an appropriate balance of small, medium, and large sites in order to safeguard supply against the numerous variables impacting delivery. The 8% level of flexibility does not provide sufficient assurance that targets will be met over the new Local Plan period, and TDC must consider all suitable and available sites for delivery.	Comment	The new Garden Villages are pivotal in the Council's ability to meet housing targets set by the Government. The Council is recommending the Local Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved. The spatial strategy has been deliberately designed to provide a balanced portfolio of sites of varying scales, locations and delivery trajectories, thereby reducing reliance on any single source of housing supply and supporting the Plan's overall deliverability. In addition to the strategic allocations, the Plan allocates a substantial number of small and medium-sized housing sites across the District. These sites are expected to make an important contribution towards housing delivery in the short and medium term, reflecting their generally lower infrastructure requirements, shorter lead-in times and ability to be brought forward by a wider range of developers. The Council's Strategic Housing Land Availability Assessment (SHLAA) identifies these sites as forming a significant component of anticipated housing supply throughout the Plan period and demonstrates that delivery is not solely dependent on the Garden Villages or other large strategic sites. The Council also notes that, following further evidence gathering and review, the anticipated delivery trajectories for the Garden Village allocations have been refined within the SHLAA to ensure they are robust, realistic and based on prudent assumptions regarding lead-in times, infrastructure provision and build-out rates. This provides greater confidence that the projected housing supply is achievable and reflects a realistic assessment of delivery prospects. The Council does not agree that the Plan places undue reliance on strategic allocations. Large sites and Garden Villages are a necessary component of the strategy as they provide the opportunity to deliver comprehensively planned growth, infrastructure, community facilities, employment opportunities and wider place-making benefits that smaller sites are generally unable to provide. The strategy therefore seeks to balance the advantages of strategic growth locations with the quicker delivery potential offered by smaller and medium-sized allocations. Furthermore, the Plan incorporates a flexibility allowance above the minimum identified housing requirement to provide resilience against

					unforeseen delays or changes in market conditions. This flexibility should not be viewed in isolation but alongside the broad range of allocated sites, extant planning permissions, commitments and windfall assumptions that collectively contribute to maintaining housing supply throughout the Plan period. The Council is therefore satisfied that the Plan contains an appropriate mix of site sizes, locations and delivery timescales and that the housing trajectory is sufficiently robust to support the Plan's housing requirement. The evidence demonstrates that smaller and medium-sized sites will make a significant contribution in the early and middle years of the Plan, whilst the strategic allocations and Garden Villages will secure longer-term housing delivery and associated infrastructure benefits. In relation to comments on Strategic Policy SLP1 and the settlement hierarchy, the Council does not agree that the approach is circular. The settlement hierarchy is an evidence-based tool which assists in understanding the relative role and function of settlements within the District and helps inform the distribution of growth. The inclusion of proposed Garden Villages reflects the role they are intended to perform once established through allocation and delivery of the Plan strategy. Their allocation is not justified solely by their position within the hierarchy; rather, it is supported by a comprehensive evidence base including sustainability appraisal, site assessment work, infrastructure considerations, spatial strategy objectives and the need to meet the District's long-term housing and growth requirements. The hierarchy should therefore be read as part of the wider spatial strategy rather than as the sole justification for any individual allocation. Accordingly, the Council considers that the proposed strategy is justified, effective and deliverable, and that the allocation of a significant number of small and medium-sized sites, alongside strategic growth locations, provides an appropriate and resilient framework for meeting housing needs across the Plan period.
1713	13669	City & Country [1713]	It is imperative that the spatial strategy and housing allocations are reviewed to significantly increase the quantum of growth delivered in small to medium sized sites (10-300 dwellings). The proposed strategy which seeks to rely on garden villages and large strategic sites is likely to result in a significant under delivery of housing and it is critical that smaller sites which do not have major infrastructure requirements are allocated to boost housing supply and provide choice and competition for market land. In order to mitigate against delayed or non-delivery, and to ensure the draft Local Plan can be found sound, it is critical that the Council allocate a higher number of smaller to medium sized sites thatcan be delivered in the short to medium term. This growth should be distributed throughout the District to sustainable locations.	Comment	The new Garden Villages are pivotal in the Council's ability to meet housing targets set by the Government. The Council is recommending the Local Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved. The spatial strategy has been deliberately designed to provide a balanced portfolio of sites of varying scales, locations and delivery trajectories, thereby reducing reliance on any single source of housing supply and supporting the Plan's overall deliverability. In addition to the strategic allocations, the Plan allocates a substantial number of small and medium-sized housing sites across the District. These sites are expected to make an important contribution towards housing delivery in the short and medium term, reflecting their generally lower infrastructure requirements, shorter lead-in times and ability to be brought forward by a wider range of developers. The Council's Strategic Housing

			It is unclear from the current drafting of Strategic Policy SLP1 how the settlement hierarchy is intended to be used. As currently articulated, it reads as if it is explaining the DLP's proposed spatial strategy. However, this of course would be problematic, given its inclusions of settlements that do not yet existing and which would require allocation through the new Local Plan in order to be delivered. For example, if the settlement hierarchy is intended to help justify the proposed allocations in the DLP, then – in respect of the Garden Villages – part of the justification for the Garden Villages becomes their position in the settlement hierarchy, which itself is dependent on their allocation, i.e. the argument for their allocation becomes circular. Clearly, this would give rise to concerns in respect of the justification for this element of the DLP.		Land Availability Assessment (SHLAA) identifies these sites as forming a significant component of anticipated housing supply throughout the Plan period and demonstrates that delivery is not solely dependent on the Garden Villages or other large strategic sites. The Council also notes that, following further evidence gathering and review, the anticipated delivery trajectories for the Garden Village allocations have been refined within the SHLAA to ensure they are robust, realistic and based on prudent assumptions regarding lead-in times, infrastructure provision and build-out rates. This provides greater confidence that the projected housing supply is achievable and reflects a realistic assessment of delivery prospects. The Council does not agree that the Plan places undue reliance on strategic allocations. Large sites and Garden Villages are a necessary component of the strategy as they provide the opportunity to deliver comprehensively planned growth, infrastructure, community facilities, employment opportunities and wider place-making benefits that smaller sites are generally unable to provide. The strategy therefore seeks to balance the advantages of strategic growth locations with the quicker delivery potential offered by smaller and medium-sized allocations. Furthermore, the Plan incorporates a flexibility allowance above the minimum identified housing requirement to provide resilience against unforeseen delays or changes in market conditions. This flexibility should not be viewed in isolation but alongside the broad range of allocated sites, extant planning permissions, commitments and windfall assumptions that collectively contribute to maintaining housing supply throughout the Plan period. The Council is therefore satisfied that the Plan contains an appropriate mix of site sizes, locations and delivery timescales and that the housing trajectory is sufficiently robust to support the Plan's housing requirement. The evidence demonstrates that smaller and medium-sized sites will make a significant contribution in the early and middle years of the Plan, whilst the strategic allocations and Garden Villages will secure longer-term housing delivery and associated infrastructure benefits. In relation to comments on Strategic Policy SLP1 and the settlement hierarchy, the Council does not agree that the approach is circular. The settlement hierarchy is an evidence-based tool which assists in understanding the relative role and function of settlements within the District and helps inform the distribution of growth. The inclusion of proposed Garden Villages reflects the role they are intended to perform once established through allocation and delivery of the Plan strategy. Their allocation is not justified solely by their position within the hierarchy; rather, it is supported by a comprehensive evidence base including sustainability appraisal, site assessment work, infrastructure considerations, spatial strategy objectives and the need to meet the District's long-term housing and growth requirements. The hierarchy should therefore be read as part of

					the wider spatial strategy rather than as the sole justification for any individual allocation. Accordingly, the Council considers that the proposed strategy is justified, effective and deliverable, and that the allocation of a significant number of small and medium-sized sites, alongside strategic growth locations, provides an appropriate and resilient framework for meeting housing needs across the Plan period.
774	13718	Trinity College [774]	We support identification of Brightlingsea as one of Tendring's three groups of Smaller Urban Settlements, recognising its relatively large population, established town centre, employment areas and existing infrastructure. These characteristics make Brightlingsea a sustainable and appropriate location for accommodating a proportionate share of District wide growth. The policy states that Smaller Urban Settlements provide strong opportunities for sustainable travel, including walking, cycling and public transport, and that they offer the right conditions for delivering sustainable housing growth on a meaningful scale. Brightlingsea accurately reflects these attributes	Comment	The soundness of the Brightlingsea allocation of 300 homes (site SAH4) was questioned at Preferred Options stage 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. It was provisionally suggested that Site SAH4 be removed from the Local Plan 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.
1439	13870	Catesby Estates [1439]	Catesby support Draft Strategic Policy SPL1 which sets out that the spatial strategy for growth across the District will be underpinned by a settlement hierarchy, with Harwich and Dovercourt identified as]a Strategic Urban Settlement; the highest 'tier' in the settlement hierarchy. This is reflective of the supporting text which confirms that strategic urban settlements represent the most sustainable locations for accommodating future growth. The Site lies directly adjacent to the built-up area of Harwich and Dovercourt and forms part of a sustainable urban extension, reflecting its location immediately adjacent to one of the most sustainable settlements in the District. Furthermore, the Site forms part of the proposed housing allocation SAMU5 – Land off Deane's Lane and Oakley Road, Dovercourt, which is expected to deliver approximately 1,650 new homes. This demonstrates that the Council recognises the Site as being in a sustainable location capable of delivering development in accordance with the principles of the NPPF. As such, Draft Policy SPL1 is supported by Catesby.	Support	This is noted and the support is welcomed.
421	14074	St John's College [421]	St John's College raises concerns with Policy SPL1, particularly the spatial distribution of housing growth and reliance on large strategic sites. While recognising their value, there is concern that delivery timescales are overly optimistic and risk undermining housing supply. The approach does not adequately reflect the rural character of the district or support smaller settlements, which benefit from proportionate growth. A greater balance of smaller sites is needed to ensure a steady supply of homes. It is also suggested	Object	The new Garden Villages are pivotal in the Council's ability to meet housing targets set by the Government. The Council is recommending the Local Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved.

			that the settlement hierarchy be refined, with more growth directed to sustainable villages such as Thorrington, including additional identified sites alongside existing allocations. (SEE ATTACHMENT FOR FURTHER DETAILS)		Garden Villages will have their own DPDs setting out the long-term vision for these settlements. This includes policies which will address active travel methods and the environment. The Plan allocates a significant number of small and medium-sized housing sites across the District, which are expected to make an important contribution to housing delivery due to their lower infrastructure requirements, shorter lead-in times and wider developer interest. The SHLAA confirms that these sites form a substantial element of the housing supply and that delivery is not reliant solely on the Garden Villages or other strategic allocations. Following further evidence review, the projected delivery of the Garden Villages has also been refined within the SHLAA to ensure assumptions on lead-in times, infrastructure and build-out rates are realistic and robust, providing greater confidence in the overall housing trajectory.
1643	14208	Bradfield Fruit Farm (Johnny Piper) [1643]	Our representation objects to Policy SPL1 (Managing Growth) insofar as its current application excludes land at and adjacent to Bradfield Fruit Farm. We argue that this exclusion represents poorly managed growth, relying instead on less sustainable and less deliverable sites. The document contends SPL1 has been applied in a rigid, map-based manner that fails to reflect the village's functional activity hub, ignores sustainable travel and land-use efficiencies, and does not properly balance environmental, social and delivery considerations. As applied, SPL1 is said to undermine sound, sustainable growth in Bradfield.	Object	We have reviewed and considered this representation, but the site was discounted as it was not keeping with the existing form of the settlement and would present an incongruous extension into the countryside.
1395	14228	Bidwells (Ms Alice Maguire, Principal Planner) [1395]	Bennett Homes supports the overall direction of the spatial strategy under draft Strategic Policy SLP1, in particular the repositioning of Little Oakley as a 'Strategic Urban Settlement' alongside Harwich and Dovercourt. This represents a logical and positive refinement to the Settlement Hierarchy, recognising the strong physical and functional relationship between the settlements. However, Bennett Homes objects to the inconsistency within Policy SLP1 whereby Little Oakley is still identified as a 'Smaller Rural Settlement', which directly conflicts with its repositioning and appears to be a technical error that should be removed. Additionally, Bennett Homes object to the absence of proposed housing allocations in Little Oakley under Table LP1, which fails to reflect its revised status, undermining its sustainability credentials and overlooking its capacity to make a meaningful contribution towards the emerging Plan's housing targets. We therefore urge the Council to consider the land promoted by Bennett Homes, which is capable of delivering up to 400 high-quality homes in a sustainable location.	Support	Noted and correction made.
505	14230	ADP Ltd (Mr Andrew Ransome, Planning Director) [505]	This representation objects to the exclusion of Land at Bradfield Fruit Farm, The Street, Bradfield, Essex, CO11 2UU. The SHLAA concludes that the site would represent an incongruous extension into the countryside and raise concerns regarding its relationship with the adjacent listed building, Maltings Cottage. However, this assessment does not accurately reflect the site's spatial context or its relationship with the existing settlement pattern. In reality, the site is centrally located within the village, positioned between and in close proximity to key community assets including the village hall, children's	Object	We have reviewed and considered this representation, but the site was discounted as it was not keeping with the existing form of the settlement and would present an incongruous extension into the countryside.

			play area and other core village services, and effectively forms part of the functional heart of Bradfield rather than an outlying parcel. As such, it represents one of the most sustainable locations for growth within the settlement, with future residents able to readily access local services and facilities on foot.		
441	14246	Richborough [441]	Our representation broadly supports Policy SPL1's vision for sustainable growth and prioritising accessible, well-served locations, including Rural Service Centres such as Thorpe-le-Soken. However, it raises significant concerns about the heavy reliance on new Garden Communities and Garden Villages, which do not yet exist and face delivery uncertainty. Their inclusion in the settlement hierarchy is considered premature and potentially unsound. The document argues for greater emphasis on proportionate growth in existing, sustainable settlements—particularly those with rail stations—to reduce risk, improve flexibility, and support timely housing delivery.	Comment	The new Garden Villages are pivotal in the Council's ability to meet housing targets set by the Government. The Council is recommending the Local Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved. The Plan allocates a significant number of small and medium-sized housing sites across the District, which are expected to make an important contribution to housing delivery due to their lower infrastructure requirements, shorter lead-in times and wider developer interest. The SHLAA confirms that these sites form a substantial element of the housing supply and that delivery is not reliant solely on the Garden Villages or other strategic allocations. Following further evidence review, the projected delivery of the Garden Villages has also been refined within the SHLAA to ensure assumptions on lead-in times, infrastructure and build-out rates are realistic and robust, providing greater confidence in the overall housing trajectory.
674	14255	AWG Landholdings [674]	Our client objects to Strategic Policy SPL1 on the basis that the Preferred Options Draft does not identify Weeley within the settlement hierarchy as per the draft policy wording, even though it is identified on the Policies Map. There appears to be no new evidence relating to the Council's settlement hierarchy; however, the adopted Local Plan is supported by a technical document titled 'EB3.1.1 Establishing a Settlement Hierarchy 2016'2. Whilst we appreciate that this document is somewhat outdated, Weeley was assessed positively against the settlement hierarchy criteria. This document concluded that, "of all the Key Rural Service Centres, Weeley is best placed to be a location for strategic housing growth" (Paragraph 4.27). The adopted Local Plan subsequently identified Weeley as a Rural Service Centre, within which opportunities for smaller-scale growth will be supported. It is also noted that "these developments will make a meaningful contribution towards addressing local housing needs, supporting the village economy and assisting with the overall housing growth proposed for the District" (Paragraph 3.60). Given that Weeley has previously been positively assessed as a Rural Service Centre, it is unclear why reference to the settlement of Weeley has been omitted from the settlement hierarchy. It is noted that Weeley Green Garden Village is identified as a Garden Village (the second tier in the settlement hierarchy), and that Weeley Heath is identified as a Smaller Rural Settlement (the fifth tier in the settlement hierarchy). Furthermore, the settlement of Weeley is identified on the Policies Map. It is therefore considered that reference to Weeley within the Preferred Options Draft has been erroneously omitted and should be reinstated as a Rural Service Centre. Our client is generally supportive of the opportunities identified for Rural Service	Object	Comments noted and a change to the wording in the hierarchy has been made.

			Centres within the emerging Local Plan for "proportionate, achievable and sustainable levels of growth that reflect the existing size and character of each settlement". Whilst it is noted that some of these Rural Service Centres accommodated higher than expected housing development during the last Local Plan period, supporting text to Strategic Policy SPL1 also sets out that "these villages will need to accommodate a proportion of this growth and a sensible level of additional development is proposed through this Local Plan" (Paragraph 3.60). However, it is also notable that a large proportion of housing supply sources are limited to strategic and medium-sized sites. A more detailed response to the Council's proposed housing supply is set out below against Strategic Policy LP1: Housing Supply, albeit, the importance of smaller scale allocations should not be overlooked. This approach to allocating smaller scale sites is supported by NPPF Paragraph 83 (December 2024; as amended February 2025), which highlights the importance of enabling rural villages to grow and thrive. We reserve the right to comment further on the policy wording within future stages of Local Plan consultation.		
441	14264	Richborough [441]	Our representation supports Clacton-on-Sea's designation as a Strategic Urban Settlement but strongly objects to Policy SPL1's settlement hierarchy. It argues that elevating proposed Garden Communities and Garden Villages—none of which are consented or delivered—is premature and unsound. Their inclusion risks circular justification and undermines effective decision-making. The document further contends that growth is not proportionately directed to Clacton despite its sustainability and service role, and that insufficient justification is provided for limiting growth in the District's most accessible and established settlement.	Support	Policy SPL1 is a strategic policy which establishes the overarching spatial strategy for growth across the District and explains how development is distributed through the Settlement Hierarchy. Sites in or near Clacton-on-Sea have been excluded from further consideration because: Significant development is already allocated or underway within the area, including: ~1,700 homes at Hartley Gardens Strategic development in the Garden Community zone. These areas are expected to contribute substantially to housing delivery through to 2041. Both the housing market in general and existing services and infrastructure in these areas are unlikely to be able to absorb any additional growth over and above the already substantial growth planned for through to 2041.
1508	14277	Gladman Developments Ltd (Matthew Jones, Senior Policy & Promotions Planner) [1508]	Gladman wish to raise concerns with the proposed spatial strategy, specifically the Council's decision to concentrate a substantial portion of the districts future housing requirement within three new Garden Villages: Hare Green, Horsley Cross and Weeley. These Garden Villages are intended to deliver 10,000 homes over 20-30 years, with 4,000-5,000 homes anticipated to be built within the proposed draft plan period. Whilst these locations are presented as a solution to meeting the increased housing requirement within the district, the scale and clustering of growth creates a spatial strategy that is heavily dependent on the delivery of large,	Comment	The new Garden Villages are pivotal in the Council's ability to meet housing targets set by the Government. The Council is recommending the Local Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved. Garden Villages will have their own DPDs setting out the long-term vision for these settlements. This includes policies which will address active travel methods and the environment. The Plan allocates a significant number of small and medium-sized housing sites across the District, which are expected to make an important contribution to housing delivery due to their lower infrastructure

			complex, infrastructure heavy sites. This approach presents significant deliverability risks to the draft Local Plan. A more distributed and proportionate growth strategy is needed, with increased allocations across the existing Towns, Smaller Urban Settlements, Rural Service Centres and Smaller Rural Settlements of Tendring. A dispersed strategy could also help ensure earlier and more reliable housing completions, reducing the over dependence on new Garden Villages, that would face inevitable delays. Gladman is promoting a site in the Manningtree/Lawford/Mistley area, which is in the Smaller Urban Settlement tier in the draft plan. The site is within a sustainable location due to the range of services and facilities, the sustainable public transport choices available and quality of life it offers residents. New development in this location can contribute to the vitality and viability of local services, stimulate the local economy through increased resident expenditure and support local education and healthcare facilities through S106 and/or CIL contributions. Alongside this, the site is available and could be delivered within the short term.		requirements, shorter lead-in times and wider developer interest. The SHLAA confirms that these sites form a substantial element of the housing supply and that delivery is not reliant solely on the Garden Villages or other strategic allocations. Following further evidence review, the projected delivery of the Garden Villages has also been refined within the SHLAA to ensure assumptions on lead-in times, infrastructure and build-out rates are realistic and robust, providing greater confidence in the overall housing trajectory. This site (CFS 117) was discounted due to its location within a Strategic Green Gap. The Council intends to retain and potentially expand Strategic Green Gaps in key areas to preserve settlement identity and prevent coalescence. Current Strategic Green Gap areas include: Areas between Clacton on Sea and Little Clacton Garden Community area Frinton, Walton & Kirby Cross Manningtree, Lawford & Mistley These gaps will remain a vital part of the Local Plan strategy through the extended plan period to 2041 therefore any sites falling inside existing designated strategic green gap areas will be excluded from analysis as part of an early sift.
1659	14287	Colne Medical Centre (Louise Weston, Assistant Practice Manager) [1659]	SPL1 (Managing Growth) requires that development is supported by the necessary infrastructure, including healthcare, and that such infrastructure is delivered in a timely manner. There is no evidence that the required healthcare capacity can be delivered alongside this development.	Comment	Noted. The Council has decided that development in Brightlingsea (SAH4) be removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, it is suggested that two smaller sites are included within the urban area of Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea. It is inevitable that new infrastructure will be required to support these developments and the communities they will serve. Developers will be expected to contribute towards the provision of necessary infrastructure. This will include contributions towards both on-site infrastructure and strategic off-site infrastructure improvements. Such contributions will be secured through Section 106 agreements under the Town and Country Planning Act 1990 (as amended) and/ or through the Community Infrastructure Levy (CIL), where applicable.
53	14376	M Scott Properties Ltd [53]	The use of a settlement hierarchy to guide development is recognised as a logical and established approach, but it should not be applied too simplistically and must consider wider sustainability factors. While directing growth to larger urban areas and strategic sites is appropriate, the predominantly rural nature of the District should also be recognised. Rural villages need proportionate growth to sustain services, support the local economy, and remain viable communities. Smaller-scale allocations in villages are more deliverable in the short term and can strengthen existing infrastructure, rather than relying heavily on large strategic developments that require significant new infrastructure.	Comment	Whilst the representation has been noted, some locations of sites put forward have been excluded from detailed analysis and were part of an early sift and these areas were therefore not subject to the full call for sites analysis strategy. These early sifting exclusions scenarios include: Settlements of Ardleigh Sites in or near Ardleigh were excluded from further consideration because: • Significant development is already allocated or underway, including: ○ Strategic development in the Garden Community zone

					• These areas are expected to contribute substantially to housing delivery through to 2041 • Both the housing market in general and existing services and infrastructure in these areas are unlikely to be able to absorb any additional growth over and above the already substantial growth planned for through to 2041
601	14387	Edward Gittins and Associates (Mr Edward Gittins, Chartered Town Planner) [601]	The Consultation Document omits any clear statement of the Plan's Spatial Strategy. This requires an independent section setting out the basis for the preferred approach for the location of future development and how this will achieve the Plan's Objectives via its Policies and Proposals. There are various references to accessibility, to transportation and growth corridors and to new Garden Villages, for example - but these need to be seen as part of a coherent growth strategy representing the most sustainable pattern for future development. In Section 3 " Sustainable Places, there is a reference to an "overall spatial strategy" in Strategic Policy SPL1 Managing Growth - but there is no text relating to an "overall spatial strategy" - an omission that should be rectified.	Comment	Please refer to the supportive text shown before Policy SPL1 in the Plan document.
409	14405	Privo Land Ltd [409]	This Representation concerns the land north of Harwich Road and east of the B1029 in Great Bromley, and explains how the site can support the Council in delivering sustainable development. It supports the principle of the Garden Village strategic allocation and the Draft Local Plan, but raises caution regarding the current policy wording, particularly the approach to phasing and the timing of infrastructure delivery. See other supporting docs attached.	Comment	Comments are noted. However, it is considered that early delivery of part of this site (Hare Green Garden Village) would lead to a piecemeal development in an unplanned manner that would not accord with the plan led growth in Chapter 9.
774	`	Trinity College [774]	We support Strategic Policy SPL1 – Managing Growth, as it provides a clear framework for directing growth to the most sustainable and appropriate locations across the District. The policy establishes a logical distribution of development that reflects the Settlement Hierarchy, accessibility to services, and the need to deliver housing and employment in a balanced way. The strategic principles set out in SPL1 provide clear guidance for future growth. See attached document for further detail.	Support	This is noted and the support is welcomed.
846	14416	St Osyth Beach Estate Ltd [846]	We are raising concerns about the settlement classification and hierarchy. We would urge updating the 2016 Settlement Hierarchy Paper and clarifying the status of Weeley and Weeley Heath, suggesting they be treated together as a Rural Service Centre. The rep criticises the inclusion of Garden Communities/Villages in the hierarchy, arguing this is inconsistent depending on its purpose. It also finds Policy SPL1 unclear in how the hierarchy informs decisions. Finally, it highlights over-reliance on large sites, delays in delivery, and calls for more small and medium developments in sustainable locations like Weeley.	Comment	The Council does not agree that Weeley and Weeley Heath should be treated as a single Rural Service Centre. Weeley is already identified as a Rural Service Centre within the settlement hierarchy, reflecting its range of services, facilities and role within the District. However, there is insufficient evidence to justify the inclusion of Weeley Heath within this classification. The Council continues to regard Weeley Heath as a separate and distinct settlement. Whilst the settlements lie in relative proximity to one another, they remain physically and functionally separate, with their own individual identities and characteristics. This position is not altered by the allocation of the Tendring Colchester Borders Garden Community, which is a strategic growth location with its own planning framework and should not be viewed as evidence that the two settlements have merged or should be considered as a single settlement for hierarchy purposes. The settlement hierarchy is based on an assessment of the role, function, accessibility and service provision of individual settlements. The Council is

					satisfied that the existing classification of Weeley as a Rural Service Centre remains appropriate and that there is no compelling evidence to warrant the reclassification of Weeley Heath. In relation to the wider comments on housing delivery, the Plan does not rely solely on strategic-scale development. Alongside the Garden Communities, it allocates a significant number of small and medium-sized sites across the District, providing a diverse and flexible housing land supply. The Council has also reviewed and refined delivery assumptions for strategic allocations through the SHLAA and supporting evidence to ensure that housing trajectories are realistic, robust and deliverable.
982	14417	Turley (Claire Newbury, Associate Director) [982]	The Settlement Hierarchy remains largely consistent with the adopted policy, with the addition of 'Garden Communities and Garden Villages' noted and ordered below the 'Strategic Urban Settlements and Garden Community'. The 'Strategic Urban Settlements and Garden Community' however now includes reference to the City of Colchester extending into the Parish of Ardleigh in Tendring, acknowledging the proximity of parts of Tendring to this large urban centre. The Site very much forms part of this area, and it is considered that the commentary and approach to this area of Tendring should be reappraised, acknowledging the highly sustainable locations that border Colchester, which do not fall within the TCBGC. At para 3.48 it states that 'there are limits to how much additional housing development these locations [strategic urban settlements and garden communities] can realistically deliver'. Whilst TCBGC will be a focus for large scale development adjacent to Colchester, the Council appears to a have missed an opportunity to identify other sustainable sites on the urban edge of Colchester, which could also deliver sustainable development, and potentially in a more immediate timeframe. This category of site is typified by Plains Farm, as this location is not acknowledged within the hierarchy notwithstanding its highly sustainable position. Instead, its falls within Ardleigh Parish which is classified as a 'Smaller Rural Settlement' towards the bottom of the hierarchy, which is not reflective of the actual situation, i.e. that Plains Farm is a sustainable urban extension location. For the avoidance of doubt, Policy SPL1 is supported by Catesby in principle. However in light of the above reference to Colchester, it is also considered that there is a legitimate opportunity to further expand Policy SPL1 to acknowledge the Colchester Fringe more specifically within the Strategic Urban Settlements list, as a Broad Area for sustainable development. This reflects the general approach of the 2007 Colchester Local Plan, which identified the Colchester Fringe as a Town, and later evolved into options for the identification of the TCBGC, which is now formally adopted.	Comment	This site has already been the subject of a previously refused planning application. Colchester City Council would be a key consultee in determining any future application because the site is more closely related to the urban area of Colchester than to any defined settlement in Tendring.

Community Representatives					
953	3472	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1520	13808	The Harwich Society (Richard Colley) [1520]	The sheer scale of development proposed in the Review Plan is excessive in relation to recent housing trends and the scale is unsuited to the character of the coastal area.	Comment	Concerns with regard to the housing numbers are understood. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is written which meets national planning guidance so that the District is not vulnerable to speculative development.
258	4277	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly support the council's inclusion of garden village developments in the west of the district, such as the Tendring Colchester Borders Garden Community. While these are vital for long-term sustainability, we recognise the need to allocate sites deliverable in the short term to meet housing targets and maintain a five-year land supply. Although the draft plan presents a positive vision in challenging circumstances, the proposed housing requirement has generated significant negative feedback from residents. We also refer to the plan's Objectives to justify support for focusing growth in western garden villages rather than continued reliance on smaller infill sites.	Comment	Support for the Garden Villages is noted and welcomed. The Council agrees that smaller allocations are needed to meet the short-term housing targets for the District, and this is reflected in the spatial strategy within the Local Plan.
244	13643	Ardleigh Parish Council (Ardleigh Parish) [244]	Cumulative Impact of Development Ardleigh is facing multiple overlapping major developments, including: Strategic housing growth (e.g. Tendring Colchester Garden Community) Four Nationally Significant Infrastructure Projects Industrial expansion Mineral extraction These proposals are assessed individually. The cumulative impact on infrastructure, the environment, food production and quality of life have not been adequately assessed. Request: A comprehensive cumulative impact assessment must be undertaken before the Local Plan progresses.	Comment	Whilst these comments are understood, it is considered that Ardleigh village already benefits from greater protection than other similar villages in the Local Plan, from housing growth. This is due to the recent adoption of their Neighbourhood Plan and their close proximity to the Garden Community. It is recognised that Ardleigh have competing development pressures, however the Local Plan only considers housing growth, as the other pressures identified are the subject of planning applications and NSIPS.
258	14163 duplicate rep 13594 deleted	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly support the addition to the policy of the section relating to Garden Communities and Garden Villages being policies SAMU1, SAMU8, SAMU9 and SAMU6.	Support	This is noted and the support is welcomed.
Members of the Public					
969	3581	Mr Scott Gilmour [969]	Hierarchy is pragmatic and considers impact on local settlements, however the choice to designate the majority of development outside of existing rail infrastructure is a missed opportunity given the spare capacity and sustainability of the railways. Furthermore there is the worry of future traffic issues. How viable is it to disperse or consolidate development around existing stations?	Object	Comments are noted. However, it is already the case that a substantial amount of proposed development is focused on settlements with existing railway stations such as Weeley and Dovercourt. It is however considered that the development of new rail infrastructure is a timely and expensive process, that will require a significant amount of development to generate the required funds.

			If it isn't, how viable would it be to reserve Right-of-Way for new rapid transport/rail infrastructure through Horsley Cross? Not only would it serve the new development but dramatically improve north-south links, benefiting tens of thousands within and outside of the District.		
981	3595	Ms Danielle Williams [981]	Wrabness has no GP, school, dentist, pharmacy or supermarket, no continuous pavements and limited public transport. Although it has a railway station, services run approximately hourly and essential facilities in Manningtree are not within convenient walking distance from the station, particularly for elderly or mobility-impaired residents. In practice, day-to-day needs require private car use. Directing around 30 dwellings to a settlement with such limited services appears inconsistent with sustainable development principles and the stated spatial strategy. Growth in smaller rural settlements should be strictly proportionate to infrastructure capacity, which in Wrabness is demonstrably constrained.	Object	Whilst it is 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.
981	3603	Ms Danielle Williams [981]	The Plan proposes substantial growth in Garden Villages and the Garden Community specifically to deliver infrastructure, employment opportunities and sustainable transport links. Directing additional housing to Wrabness, a Smaller Rural Settlement with limited services and constrained access, appears inconsistent with this strategy. Where large-scale developments are planned with schools, services and infrastructure integrated from the outset, it is not clear why additional growth must also be imposed on small villages lacking such capacity. The allocation at Wrabness is not justified when more sustainable and infrastructure-led alternatives exist elsewhere in the District.	Object	The Council considers that the allocation represents a proportionate level of growth for a Smaller Rural Settlement and is consistent with the spatial strategy. Highway, infrastructure and sustainability matters have been considered through the Local Plan evidence base and will be subject to further detailed assessment through any future planning application. No modification is proposed.
1059	3724	Mr Matthew Sutton [1059]	The plan acknowledges significant growth in the Frinton, Walton and Kirby Cross cluster during the last Local Plan period, yet no new GP surgery has opened and school capacity has not kept pace. The spatial strategy proposes further housing for this area with no acknowledgement of the infrastructure deficit that prior growth has already created. Before further allocations are confirmed, the plan should require a published assessment of the current healthcare and school capacity gap and a binding mechanism to address it.	Object	The Council has updated its Infrastructure Delivery Plan (IDP) and transport modelling to understand where facilities and services, such as roads and surgeries, are needed to support new development. The Council will continue to work with Essex Highways and the NHS/ ICB to ensure these upgrades are delivered alongside growth.
1059	3734	Mr Matthew Sutton [1059]	The plan acknowledges in paragraph 9.26 that the Frinton, Walton and Kirby Cross area has limited development capacity, yet allocates a further 620 homes there through SAH2 and SAH3. Those two policies contain no healthcare infrastructure requirement - unlike every other major allocation in the plan, which includes at minimum an NHS/ICB financial contribution clause. The area has already absorbed growth without corresponding primary care or school expansion. The spatial strategy is unsound if it directs growth to a constrained area with weaker infrastructure protection than is applied elsewhere across the District.	Object	Comments are noted and whilst the text was consistent across the major allocation, the wording has been updated to explicitly reference contributions for healthcare and emergency services.
526	3736	Mr kevin millar [526]	unless the A133 from Weeley is made into a 2 lane dual carriageway growth will come to a halt	Comment	This representation is noted. The Council has updated its transport modelling to inform on where upgrades to road infrastructure are needed. In the interim, the Council will continue to work with Essex Highways and the relevant infrastructure providers to ensure these upgrades are delivered alongside growth.
1066	3747	Mr Gavin Tuff-Lacey [1066]	The plans create sprawl of current rural settlements which will remove their rural identity entirely.	Object	Though concerns with regard to local character surrounding the Garden Villages are noted, these are pivotal in the Council's ability to meet housing targets set by the Government. The Council is recommending the Local

			The creation of new villages is a good idea in principle as it preserves existing settlements, but to create new villages/towns, a new location should be chosen away from existing settlements which will also encourage new infrastructure rather than trying to develop around existing residents and adapt existing infrastructure. The current scheme will simply result in changing the environment for current residents and provide a compromised infrastructure.		Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved. Garden Villages will have their own DPDs setting out the long-term vision for these settlements. This includes policies which will address active travel methods and the environment. Other policies in Chapter 7 of the Local Plan will mitigate adverse development impacts.
616	3916	Mr Kevin Everitt [616]	3.65 says a small increase in housing stock for smaller rural settlements. MSA24 combined with MSA25 at Weeley Heath is 77 new homes this is surely far more than a small scale increase in this smaller rural settlement. The Independent Planning Inspectorate previous refusal on Appeal (APP/P1560/W/203254569) took the small rural settlement into consideration as part of the refusal.	Object	Whilst this representation is noted, housing allocations within the Local Plan have been assessed based on infrastructure, environmental constraints, retail/ job opportunities, and other factors. The site in Wrabness has been appropriately assessed through the robust evidence base and allocated a proportionate amount of housing based on the characteristics of the settlement. Although concerns with regard to new development are noted, the Council has chosen an approach to development which disperses housing across the District so that new housing targets set by the Government can be met.
1350	4010	Prof Mark Lowdell [1350]	The Horsely Cross Garden Village will add thousands of road users to the already inadequate A120 and force more traffic onto the A137 through Lawford and Ardleigh. The plans to add 100 homes to Bradfield only makes this worse, with the only access to work, schools etc being via Windmill Road and Straight Road onto the Clacton Road to the A120 or A137. If these homes are built they will ineveitably be advertised sa "close to Manningtree Station and easy access into London" when that train service and parking at Manningtree Station are already at their limits.	Object	This representation is noted; the Council have provisionally suggested the reduction of dwellings on site MSA9 from 100 to 20. This will significantly reduce impacts on local infrastructure. Please find more information within Chapter 9 of the Local Plan. The Council has updated its transport modelling to inform on where upgrades to road infrastructure are needed. In the interim, the Council will continue to work with Essex Highways and the relevant infrastructure providers to ensure these upgrades are delivered alongside growth.
581	4083	Mrs Sally Webb [581]	All of the areas detailed in the plan are parking and traffic nightmares at various times of the day; schools area full in the Lawford/Manningtree/Bradfield areas; sewars are under constant pressure from the existing infrastructure with many incidents reported. I am sure we will manage growth but not at the rate it is planned.	Object	The Council has updated its Infrastructure Delivery Plan (IDP) and transport modelling to understand where facilities and services, such as roads and surgeries, are needed to support new development. The Council will continue to work with Essex Highways and the NHS/ ICB to ensure these upgrades are delivered alongside growth.
1417	4377	Mr reginald tricker [1417]	it seems very strange to not have existing "Weeley" within a category, and to only mention the Garden Village and the Heath. The existing village of Weeley should itself be recognised as a Rural Service Centre (?). It should also be noted that people living in Weeley as a whole would not consider the differentiation between the village and the heath as so severe as to treat them as different settlements and place them in different categories, and so perhaps Weeley and Heath could be grouped. Weeley has its own needs separate to those of the Garden Village development.	Comment	Comments noted and a change to the wording in the hierarchy has been made.
1425	4397	Mr Bruce Ellis [1425]	Wrabness is a Smaller Rural Settlement and an amenity enjoyed by residents of the village and frequently by those living further afield who visit to benefit from the nature reserves etc and to enjoy the special characteristics of the rural setting generally. Increasing the number of houses by 30 will erode the amenity value of the special environment which makes Wrabness now and further when consideration is given to future Local Plans whereby additional housing numbers	Object	Whilst this representation is noted, housing allocations within the Local Plan have been assessed based on infrastructure, environmental constraints, retail/ job opportunities, and other factors. The site in Wrabness has been appropriately assessed through the robust evidence base and allocated a proportionate amount of housing based on the characteristics of the settlement. Although concerns with regard to new development are noted, the Council has chosen an approach to

			will be quantified against the number of existing properties. Once the special environment is lost, it will be impossible to recover.		development which disperses housing across the District so that new housing targets set by the Government can be met.
822	4474	Rachel Fletcher [822]	Improve engagement. Stewardship needs to include local people in the affected communities.	Comment	This representation is noted. The Council aims to engage with the local communities and relevant stakeholders during the Local Plan Review. The Regulation 18 consultation has allowed the Council to proactively engage with members of the public, parish councils, infrastructure providers, businesses, and other groups and organisations. Respondents have been given the option to engage with the Local Plan through in person events, web submission, emails, and paper letters. The Council will continue to engage as appropriate as outlined with the Statement of Community Involvement.
641	14157	P. J. Millar [641]	ELP Policy SPL1 identifies Weeley Heath as a smaller rural settlement, the fifth and lowest category in sustainability terms. Therefore the SDB for Weeley Heath has been drawn to limit growth in this category of rural settlement to the small scale of residential infill needed to help younger people to continue to live in the area, keep local shops and services viable and help bring balance to any ageing population. This text indicates that schemes be limited to 10 dwellings unless there is local support from the Parish Council or through an approved Neighbourhood Plan. The mixed scheme of up to 80 dwellings, situated outside the SDB, greatly exceeds the amount of housing growth proposed by the ELP for this scale of settlement and conflicts with Policy SPL 2	Comment	Whilst the comments are noted, it is considered that growth across the District is proportional to each individual settlement. It is considered that attaching an arbitrary number such as 10 dwellings would not necessarily reflect the growth needed.
1503	14326	Mr Carl Richardson [1503]	The proposed inclusion of Tendring Heath as a Smaller Rural Settlement within the settlement hierarchy for Tendring District is welcomed and supported. This reflects both recent development at the settlement, on either side of Heath Road, and the potential for further sustainable development of the former haulage depot under site reference MSA22. The scale of development envisaged on site MSA22 is consistent with this categorisation and will make efficient use of a previously developed site in a manner that will relieve pressure for growth of such villages and support the viability of local facilities and services within the wider rural area.	Support	This is noted and the support is welcomed.

Policy SPL1: Managing Growth

Summary of Representations

Policy SPL1 received a mixture of support, objections and comments from technical stakeholders, developers, landowners, community representatives and members of the public. Several respondents supported the broad spatial strategy and settlement hierarchy, particularly where it directs growth towards the most accessible settlements, including Clacton, Manningtree and Alresford, and recognises the role of smaller rural settlements in supporting local housing needs, services and community vitality. Support was also given for the proposed Garden Villages, with some developers and land interests noting their potential to deliver a significant proportion of the District's housing and employment needs alongside strategic infrastructure and longer-term planned growth.

A number of technical stakeholders raised matters relating to the environmental, infrastructure and transport implications of the growth strategy. The National Landscape Office highlighted the need to consider the impacts of growth at Manningtree, Lawford, Mistley and Bradfield on the setting and natural beauty of the Dedham Vale and Suffolk & Essex Coast and Heaths National Landscapes. Natural England advised that new housing across Tendring could increase recreational pressure on Essex Coast habitat sites and that some development land may be functionally linked land. The Environment Agency requested that updated flood risk and climate change evidence inform future growth locations, while Anglian Water raised concerns about wastewater treatment capacity, particularly in smaller settlements not served by the public sewer network or served by small water recycling centres. Essex County Council suggested additional wording in relation to reducing car dependency, public transport accessibility, active travel, Garden Village transport infrastructure, freight routing and coastal change.

Developers and landowners raised a range of comments on the settlement hierarchy and the distribution of growth. Some supported the identification of Strategic Urban Settlements, Rural Service Centres, smaller rural settlements and Garden Villages, while others objected to the position of the proposed Garden Villages within the hierarchy or considered that certain locations, such as Fox Street, should not be defined as settlements because of limited facilities

and access to services. Representations also sought changes to particular locations, including the reinstatement of Point Clear as a settlement and the expansion of Lanswood Park, while other respondents objected to freestanding new settlements on the basis that they would alter the rural character of the District.

In response, changes have been made to Policy SPL1 and its supporting text. A paragraph has been added to the supporting text which outlines the implications of coastal change and the designation of Coastal Change Management Areas. Little Oakley has also been removed as a Smaller Rural Settlement. The Council considers that Policy SPL1 provides a clear framework for managing growth across the District by identifying the broad role of different settlement types and distributing development in a way that responds to settlement size, function, accessibility and the need to meet mandatory Government housing requirements. Therefore,the Council does not consider that the overall order of the settlement hierarchy requires amendment, including the position of the proposed Garden Villages, which are expected to deliver planned new communities supported by infrastructure, services, green infrastructure and sustainable travel opportunities.

Policy SPL2: Settlement Development Boundaries

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object /Comment	Council response
Technical Stakeholders					
1335	4365	Affinity Water Ltd [1335]	Policy SPL2 is supported. As set out in the representations to Policy LP7, the demand for self and custom build plots in Tendring is not being met. The allocation of the land at Mill Hill in Manningtree (Site Ref. MSA3), promoted by Affinity, could be extended to include adjacent land to the south west off Colchester Road, which would be suitable for a small self-build development.	Support	The Council does not consider it appropriate to allocate additional land adjacent to site MSA3, due to its designation as a Strategic Green Gap
1650	6883 duplicate rep 6885 deleted	East Suffolk Council (Ian Johns) [1650]	Suggest amending SPL2 wording – replace 'generally look to refuse planning permission for new development…' with stronger language to ensure a more robust refusal of applications outside settlement development boundaries.	Comment	It is considered that the existing wording within the Policy is sufficiently robust. This was also borne out of the recent examination in public of the current adopted Local Plan.
6	13455	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Outside of development boundaries: Our infrastructure, by its very nature is often located on the edge of settlements or in the countryside. We request that the policy is amended to state: "Proposals for the delivery and operation of essential utilities infrastructure, where there is a proven need and a countryside location is essential for the delivery of those utilities, will be supported where they accord with other policies in the development plan. " Based on the wording in West Suffolk Local Plan Policy 24 Economic development and essential utilities in the countryside	Comment	Whilst comments are noted, these rural developments and their associated infrastructure will be considered on a case by case basis. It is not felt that any changes to policy wording are required.
Businesses, Landowners and Developers					
88	3845	Stanfords (Miss Mollie Foley) [88]	The attached response argues that Policy SPL2 is overly restrictive and inconsistent with national guidance. It highlights that development outside settlement boundaries should not be presumed unacceptable, as plans cannot predict all sustainable proposals. The draft boundaries are drawn too tightly, excluding existing built-up areas and limiting organic growth. The policy's wording, combined with rigid boundaries, risks preventing windfall, small-scale, and locally needed development. The response requests more positive, flexible wording and boundaries that better reflect settlement form and national policy expectations.	Comment	It is considered that the existing wording within the Policy is sufficiently accommodating to the possibility of new development outside the SDB. Other policies consider countryside development.
705	4061	Mr Peter Le Grys [705]	SPL2 is too harsh and restrictive. It should follow the criteria contained within SPL2 of the adopted plan.	Object	It is considered that the existing wording within the policy is sufficiently accommodating to the possibility of new development outside the SDB. Other policies consider countryside development.
136	4402	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	This proposed Policy also rolls forward the existing well tested adopted policy but with relevant new additions to make the new policy robust and effective for development management and decision-making purposes.	Support	This is noted and the support is welcomed.

1422	4411	M Scott Properties Ltd (Scott Properties) [1422]	Agree that Garden Villages such as Horsley Cross will be the subject of separate Development Plan Documents. The broad location identified for growth at Horsley Cross is shown through diagrams SAMU9 and Map B.15a. It is considered the Horsley Cross Garden Village should be expanded to include the whole of the Site to optimise the capacity of the proposed garden village given its location, promote sustainable development as set out in paragraph 8 of the NPPF 2024, and ensure the plan is positively prepared, in accordance with paragraph 36 of the NPPF 2024.	Comment	Whilst comments are noted, it is considered that the scale of developments in this location is acceptable. This being said, if the DPD requires something different in the future this will be considered at a later date.
1462	4485	Latimer (Tendring Colchester Borders Garden Community) Developments Limited [1462]	To ensure that the policy is clear and unambiguous and therefore effective, given the boundary of the TCBGC (and the other garden villages), is to be defined via the respective DPDs, it is requested that the second paragraph of the policy text is amended as follows: Outside of Settlement Development Boundaries (with the exception of the Tendring Colchester Borders Garden Community, Hare Green Garden Village and Horsley Cross Garden Village), the Council will generally look to refuse planning permission for new development unless there are specific policies in this Local Plan or other material considerations that either allow or would justify otherwise.”	Object	Comments are noted but it is considered that the policy has the correct levels of protection of the open countryside and any changes can be considered at DPD stage.
853	5447	Taylor Wimpey [853]	We request a coordinated cross-boundary approach, including extending the settlement boundary to join with the neighbouring Colchester allocation, supporting the chapter’s emphasis on consulting neighbouring authorities and managing cross-boundary impacts. The Site falls outside of settlement boundaries. The closest settlement to the Site is ‘Fox Street’ (situated c. 150m to the northwest of the Site at its closest point), which is classified as a ‘Smaller Rural Settlement’. Notwithstanding this, there is an existing row of residential houses bordering the Site to the west. Supporting Paragraph 3.45 of the draft Local Plan sets out that the settlement hierarchy categorises settlements and locations in respect of their role in accommodating future growth.	Comment	Comments are noted but to consider this cross-boundary approach is complex and cannot be taken forward at this stage.
134	5620	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	Objection to Policy?SPL2 (Settlement Development Boundaries) because it lacks clear criteria for applications outside SDBs; the phrase “pattern and scales of growth” is vague and offers no guidance, potentially deterring viable proposals.	Object	It is considered that the existing wording within the policy is sufficiently accommodating to the possibility of new development outside the SDB. The policy as drafted is clear and allows for applications in exceptional circumstances.
853	6978	Taylor Wimpey [853]	We recommend amending Strategic Policy?SPL2 to avoid a blanket “generally look to refuse” stance on development beyond settlement boundaries, proposing wording that distinguishes sustainably located land from isolated sites.	Comment	It is considered that the existing wording within the policy is sufficiently accommodating to the possibility of new development outside the SDB. The policy as drafted is clear and allows for applications in exceptional circumstances.
828	13634	Welbeck Strategic Land IV LLP [828]	Welbeck are promoting the following two sites for development in Elmstead Market for residential development: 1) Land north of Meadow Close (85 dwellings) - SHLAA (December 2025) Reference RSC5 2) Land north of Colchester Road (30 dwellings) – SHLAA (December 2025) Reference RSC6	Comment	The representation promoting Land North of Meadow Close (SHLAA Ref. RSC5) and Land North of Colchester Road (SHLAA Ref. RSC6) for residential development is noted. Both sites are currently the subject of planning applications submitted under the Town and Country Planning Act 1990, which remain undetermined and are progressing through the development management process. In direct response to this representation and given the above, it would be inappropriate for the Council to reach conclusions on their suitability for allocation at this stage.

			Planning applications have recently been submitted for both sites and the applications are currently pending. It is considered that both sites would make a valuable contribution towards the Councils housing needs, and the sites should be allocated and the settlement boundaries amended accordingly.		The Council will continue to review the situation around these submissions/sites and as they progress through the development management process before determining whether any amendments or updates to any local plan evidence/the local plan itself are justified.
1713	13670	City & Country [1713]	In terms of the proposed approach to development within Settlement Development Boundaries, this is broadly supported. We do however suggest the policy would benefit from explicitly confirming that the stance applies to land that currently lies beyond, but which the new Local Plan will bring within, the Settlement Development Boundaries. In terms of the proposed approach to development beyond Settlement Development Boundaries, the policy is unduly negative and inflexible with its reference to: "the Council will generally look to refuse planning permission for new development unless there are specific policies in this Local Plan or other material considerations that either allow or would justify otherwise". As currently worded, this suggests the Council will adopt a negative stance to new development, regardless of the sustainability and / or wider benefits afforded by proposals. New development should not be considered inherently unsuitable on land that is beyond settlement boundaries (indeed, there will be forms of development that are more appropriately located outside of Settlement Development Boundaries than within). Furthermore, such a blanket restriction on development is not considered consistent with the NPPF, the draft NPPF or the Government's objective to significantly increase the delivery of housing and to grow the economy. We note that a similar approach was proposed in the case of the North Warwickshire Local Plan, but rejected by the Examining Inspector. In addition to conflict with the NPPF, the Inspector also concluded that the proposed restrictive approach to development outside of settlement boundaries conflicted with policies which provided in-principle support for windfall development to contribute towards meeting housing needs, as well as noting that uplift in housing delivery in the Borough over recent years has, in large part, resulted from permitting development outside of settlement boundaries. These are factors that are applicable to Tendring District also. The proposed policy fails to differentiate between land that is beyond Settlement Development Boundaries, but which may nevertheless be sustainably located, and that which is more isolated and likely less sustainable for development. We suggest that it is important to draw distinction between these. The Council will be aware that there is a strong probability that, during the course of the plan period, there will be changes in circumstances and unforeseen matters arising that necessitate needs being accommodated through development of land beyond Settlement Development Boundaries. In such circumstances, it will of course be beneficial to have policies in place to guide such development to the	Comment	Comments are noted but it is felt the policy is sufficiently balanced to allow growth in the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.

			most sustainable locations. The current Development Plan, specifically the Local Plan Section 1 (which applies to Braintree and Colchester, as well as Tendring District) supports development within or adjoining existing settlements, subject to the scale, sustainability and existing role of the settlement. This policy (SP3) helps provide flexibility and for planning to be able to respond positively to sustainable opportunities to address development needs in North Essex, where these cannot be accommodated by development within the settlement boundary. We note the Council has expressed concerns that the policy has resulted in an unintentionally permissive approach to development beyond settlement boundaries, but the proposed alternative wording as per DLP SLP2 is overly negative. We suggest that the wording be reviewed to strike an appropriate balance, and ensure opportunities to achieve sustainable development are not looked upon unduly unfavourably. Furthermore, and in any case, in the context of the current housing crisis and the Government's exhortation to significantly boost the supply of homes, the new Local Plan should be at least as positive to proposals for housing development, certainly not less so, Alternatively, the Council may wish to consider the approach being taken by the emerging Dorset Local Plan, in which the Council is currently proposes removing traditional settlement boundaries for villages, replacing them with a 'flexible settlement' policy that seeks to facilitate incremental growth of villages identified as being sustainable for growth (which in Tendring District's case could include inter alia Rural Service Centres).		
1439	13871	Catesby Estates [1439]	Catesby support Draft Strategic Policy SPL2 which confirms that, in order to encourage sustainable patterns of growth and control urban sprawl, each settlement identified within Policy SPL1 will be defined by a Settlement Development Boundary as shown on the relevant Policies Map. The policy states that within Settlement Development Boundaries there will be a general presumption in favour of new development. On the basis of the Site being included within the boundary of a proposed allocation, it also falls within the proposed Settlement Development Boundary for Harwich and Dovercourt, reflective of it being a sustainable location for growth. As such, Catesby support this draft policy as it provides an appropriate framework for directing development to sustainable locations and will help contribute towards meeting the Council's housing requirements in accordance with the NPPF.	Support	This is noted and the support is welcomed.
421	14075	St John's College [421]	SJC raises concerns with Policy SPL2 for Thorrington, noting the settlement boundary is drawn too tightly and does not allow for sufficient growth. Thorrington is considered capable of supporting additional development due to its services, facilities, and accessibility. Two sites (CFS155 and CFS156) are promoted as suitable, deliverable, and able to provide early housing supply, alongside MSA23. Technical evidence indicates no significant constraints, including access or infrastructure.	Object	Whilst this representation is noted, it is felt that the minimal nature of the village would not support any further growth and the site selected offers the most appropriate for development.

			Greater allocation at Thorrington would help address over-reliance on strategic sites, improve delivery within the plan period, and support sustainable growth while benefiting the local community and services. (SEE ATTACHMENT FOR MORE DETAILS)		
1643	14214	Bradfield Fruit Farm (Johnny Piper) [1643]	Our representation objects to Policy SPL2 (Settlement Development Boundaries), arguing that its current boundary excludes land at and adjacent to Bradfield Fruit Farm in an arbitrary, map-based manner. It contends SPL2 fails to reflect how the village functions on the ground, ignoring the village hall and playing fields as the true activity hub. Citing appeal precedents, the document argues that the Fruit Farm should be within the settlement boundary as a logical, defensible edge. Applying SPL2 rigidly is said to conflict with sustainable development principles and risk plan unsoundness.	Object	We have reviewed and considered this representation but appears to promote development in the countryside. It is also felt the policy is sufficiently balanced to allow growth in the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.
441	14249	Richborough [441]	Our representation broadly supports development within Settlement Development Boundaries but strongly criticises Policy SPL2's restrictive approach to land beyond them. It considers the presumption against development unjustified, inflexible, and inconsistent with the NPPF, failing to distinguish between sustainable edge-of-settlement sites and isolated locations. The policy is seen as overly negative, risking reduced housing delivery and loss of flexibility over the plan period. The document argues for a more balanced, positive approach that allows sustainable proposals beyond boundaries, supports windfalls, and helps maintain housing supply in changing circumstances.	Comment	Comments are noted but it is felt the policy is sufficiently balanced to allow growth in the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.
674	14256	AWG Landholdings [674]	Strategic Policy SPL2 sets out that "outside of Settlement Development Boundaries, the Council will generally look to refuse planning permission for new development unless there are specific policies in this Local Plan or other material considerations that either allow or would justify otherwise". While the importance of maintaining individual settlement identity is recognised, national policy clearly states that planning policies and decisions should promote effective use of land in order to meet the need for homes and other uses (NPPF Paragraph 124, December 2024; as amended February 2025). It is therefore imperative that a degree of flexibility is adopted within policy wording to ensure that appropriate growth is not unnecessarily restricted. Strategic Policy SPL2 also identifies settlement development boundaries, which are illustrated on the Policies Map. Our client strongly objects to Strategic Policy SPL2 on the basis that the settlement development boundary at Weeley does not accurately reflect the existing built form. As set out at Appendix A – Glossary of Terms, settlement development boundaries are defined as: "the extent of defined towns and villages within which there is a presumption, in principle, in favour of development. Land outside of the Settlement Development Boundary is considered to be countryside". The proposed settlement development boundary at Weeley is shown in Appendix 2 of this covering letter. Our client, AWG Land Holdings Ltd, owns 'Land East of Willow Walk', at the southern edge of the village of Weeley. The Site is located just to the	Object	Comments are noted but it is felt the policy is sufficiently balanced to allow growth in the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.

			east of Weeley Railway Station and north of the railway line. The Railway Station is within easy walking distance of the site, approximately 180 metres away. The site is accessed off The Street, just off the B1441 Weeley Bypass. The Site is bordered to the north and west by residential development and to the south by the railway line. To the east of the Site, 280 new dwellings along with the development of 13 new roads are being built out following the granting of planning permission relating to 'Land to the south of Thorpe Road, Weeley'. It is considered that 'Land East of Willow Walk' comprises part of the village of Weeley and therefore should be identified as such on the Policies Map. The site is not disconnected in any way from the rest of the settlement, is located adjacent to existing residential development, in close proximity and easily accessible to the Weeley Railway Station, and to the north of the railway line which forms a clear settlement edge. Therefore, the site falls within "the extent of defined downs and villages" (Appendix A – Glossary of Terms). There appears to be no logical reason as to why this site has been excluded from the settlement boundary, and without robust evidence, it is deemed that Strategic Policy SPL2 is not justified or effective. Furthermore, residential development at this site would also complement the existing built form and would therefore seem to be a logical amendment to the settlement development boundary. In this context, our client's land at 'Land East of Willow Walk' represents a logical opportunity that could deliver up to 9 dwellings in a sustainable location within Weeley. We therefore request that the Policies Map be updated to include 'Land East of Willow Walk' within the settlement development boundary of Weeley. We reserve the right to comment further on the policy wording within future stages of Local Plan consultation.		
441	14269	Richborough [441]	Our representation broadly supports Policy SPL2's approach to development within settlement boundaries but strongly objects to its restrictive stance on development beyond them. It argues the policy is unjustifiably negative, overly inflexible, and inconsistent with the NPPF. SPL2 fails to distinguish between sustainably located sites adjacent to settlements and more isolated locations, risking the refusal of beneficial development. The document calls for a more balanced, flexible approach to allow sustainable opportunities, maintain housing delivery, and ensure the plan remains positively prepared and effective over its lifetime.	Comment	The Council disagrees that Policy SPL2 is inconsistent with national policy. It is felt the policies regarding settlement development boundaries are sufficiently balanced to allow growth on the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.
795	14294	Boxford Suffolk (Farms) Ltd [795]	Policy SPL2 confirms that "Outside of Settlement Development Boundaries, the Council will generally look to refuse planning permission for new development unless there are specific policies in this Local Plan or othermaterial considerations that either allow or would justify otherwise." Sites 202, 3261 and 3262 are located on previously developed land, in a position between built form where a suitable policy could allow appropriate infill development to occur. We object to the omission of such a policy which would allow small scale	Comment	Comments are noted but it is felt the policy is sufficiently balanced to allow growth in the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.

			development to come forward in rural areas where there is a group of existing dwellings. Site reference 234 is considered to represent a good example of such a site, being located within a group of dwellings in a countryside location along Waterhouse Lane. Similar polices have been adopted in Suffolk Coastal and Waveney districts, now forming East Suffolk Council. The draft 2025 NPPF has come with a swathe of measures to streamline the approval for housing developments in the future. The Framework promotes sustainable, diverse, and regionally coordinated housing growth, with streamlined processes for small to medium sized sites and rural proposals, particularly where they emphasise design quality, sustainability and effective land use. This includes a requirement under draft NPPF Policy HO6 'Planning for a Diverse Mix of Sites' to allocate at least 10% of land for housing development on sites no larger than one hectare, with another 10% on sites between one and two and a half hectares. Furthermore, draft NPPF Policy S5 'Principle of Development Outside Settlements' will provide increased scope for proposals to be approval, depending on compliance with other decision-making policies, on such sites which represent limited infilling within existing groups of houses.		
1718	14318	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning Ltd wish to comment on how the general presumption in favour of development within Settlement boundaries will work in respect of allocated sites. In our view, the policy should be worded in a way that also applies the presumption for allocated sites.	Comment	Comments are noted and whilst preferred sites are allocated for development within the Local Plan, these will be subject to planning applications and in some cases DPDs.
1692	14343	Lewis & Scott Homes [1692]	We are concerned to see the addition of the text that advises that development outside of the settlement boundaries will generally be refused unless specific policies of the Plan or material considerations allow otherwise. We OBJECT to the general presumption against development outside of the settlement boundary which not only flies in the face of emerging national policy but will ultimately prejudice the delivery of windfall sites that the plan relies on for small site developments (see Table LP1 for example). We also consider that it will hinder the opportunity for acceptable schemes on the edge of settlements, such as those for age-restricted C3 housing with a detrimental impact on the ability of the plan to fulfil Objective 1. Instead, we suggest that the wording of the second paragraph of this policy revert to the wording of the second paragraph of this policy in the adopted Local Plan.	Object	Comments are noted but it is felt the policy is sufficiently balanced to allow growth in the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.

			Should the Council object to this, we suggest that the third paragraph of this policy be amended to make explicit reference to the delivery of all forms of specialist housing for the older population as being an exception to this policy.		
1722	14392	Stanfords (Mollie Daniels) [1722]	Policy wording on development outside Settlement Development Boundaries (SDBs) is overly restrictive and inconsistent with national policy, which promotes a positive, flexible approach to sustainable development. The Plan cannot anticipate all acceptable proposals, especially windfall and small-scale schemes, so limiting approval to predefined categories risks stifling growth and local opportunity. National guidance treats SDBs as guides, not firm limits, yet the draft applies them rigidly. Boundaries are also tightly and inconsistently drawn, excluding existing built-up areas and limiting natural settlement evolution. Overall, Policy SPL2 discourages development and should be revised to enable flexibility, support sustainable growth, and reflect realistic settlement patterns.	Comment	Comments are noted but it is felt the policy is sufficiently balanced to allow growth in the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.
982	14418	Turley (Claire Newbury, Associate Director) [982]	To support the proposition that the Site is in a sustainable location, it is relevant to note that residential development has been developed immediately to the south of the site, within the last 10 years, part of which was agricultural land. In assessing the suitability of this adjacent site for development, the committee report notes that: 'While the site lies outside the urban boundary in the Tendering District Local Plan, this site would represent a logical extension to the urban settlement of Colchester... The site lies within close proximity of various community services all within walking distance of the site and close to existing public transport links.' The above description could equally be applied to the Site at Plains Farm. Following on from this point, the Proposals Map identifies Settlement Development Boundaries. It is considered that, given the established residential development on the land immediately adjoining the Site, this land should be included within the Settlement Development Boundary on the Tendring Proposals Map. Whilst it is appreciated that Colchester is covered by Colchester City Council, the fringe of the settlement in this area should also be reflected on the Tendring Proposals Map. This would in turn result in the Plains Farm Site being immediately adjacent to the settlement boundary. In addition, as can be seem from the above extract, Colchester City Council are seeking to allocate a swathe of land within and up to their boundary to the south-east of the Plains Farm Site (identified as PP9 North-East Colchester, within the Preferred Option Colchester draft Local Plan). In commentating on the suitability of this site, Colchester acknowledges the site's proximity to the edge of Colchester 'which is at the top of the spatial hierarchy', as noted within the Summary of Sites Evidence (October 2025).	Comment	Comments are noted but it is felt the policy is sufficiently balanced to allow growth in the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.

			This provides further evidence regarding the sustainability credentials of land immediately adjoining the settlement boundary of Colchester, whether within the administrative boundary of Tendring or Colchester. On this point, the new text introduced within Policy SPL2, takes no account of the sustainable location of such Colchester Fringe locations, instead proposing a 'Settlement Development Boundary' beyond which proposals for new development will be refused unless there are specific policies within the Plan or other material considerations to allow such development.		
846	14419	St Osyth Beach Estate Ltd [846]	The Representation supports the general approach to development within Settlement Development Boundaries, subject to clarification that this includes land being brought inside the boundary through the new Local Plan. It considers the proposed stance on land beyond settlement boundaries overly negative and inconsistent with national policy, noting that it implies a presumption against development regardless of its sustainability. The Representation highlights that similar restrictive wording has been rejected at other examinations and argues that the policy fails to distinguish between well-related land and isolated locations. It recommends more balanced wording that maintains flexibility over the plan period and aligns with existing policy SP3, ensuring sustainably located development beyond boundaries is not automatically discouraged.	Comment	Comments are noted but it is felt the policy is sufficiently balanced to allow growth in the countryside. There are other policies within the Plan providing specific allowances for development beyond the SDB e.g. PP13, PP6a LP7 and LP9.
1503	14327	Mr Carl Richardson [1503]	The proposed inclusion of a settlement boundary for Tendring Heath, and its definition to include the former haulage depot at Heath Road, is supported. Similarly, the wording of Policy SPL2, which sets out a general presumption in favour of new development within defined settlement boundaries, to encourage sustainable patterns of growth, is welcomed.	Support	This is noted and the support is welcomed.
1691	14413	Mr S Spencer [1691]	Amend the settlement development boundary for Thorpe-le-Soken/Thorpe Green on the Policies Map so as to include Land at The Paddocks within the planned built extent of the settlement. The current boundary appears to exclude a site that is physically related to the existing built form, immediately adjoins the appeal-approved and now constructed Paddock Drive development, and sits within a part of Thorpe Green that has already experienced modern residential growth. Revising the boundary in this location would more accurately reflect the pattern of development on the ground and would avoid undue reliance on an historic boundary that no longer provides the most logical basis for assessing this parcel through the emerging Plan.	Comment	This extension site appears to have been withdrawn, therefore no reason to consider a further change to the SDB.
1738	14455	Mr D Akers [1738]	Amend the Settlement Development Boundary to include the site, reflecting the functional reality that Holland-on-Sea forms part of the wider Clacton urban area and that the allocation represents a logical, planned rounding-off of the existing built edge rather than sporadic countryside intrusion.	Comment	25/01011/OUT Comments noted, application has been allowed at appeal, therefore it seems logical to remove the Green Gap designation and redraw the SDB.
1426	4413	Mr Peter Morris [1426]	Land to the North of Elm Farm Country Park (Frinton Road, Thorpe-le-Soken) has been excluded from the settlement development boundary.	Comment	Comments noted, however this site was sifted as reasons given in the SHLAA - The existing green wedge makes a valuable contribution to the character and

			Land incorrectly identified on the local plan draft review drawing for Thorpe-le-Soken as Elm Farm Country Park. No response after submission made to call for sites. Over 55's / later life or assisted living village style development. Extension of existing Housing association development.		environmental quality of the area. Introducing development in this location would conflict with the established landscape pattern and result in significant harm to its visual and ecological integrity. The only available option for access appears to be via an existing safeguarded holiday park, which is not supported.
578	13704	Miss Kelly Whatmough [578]	We are reaching out in relation to the current review of the Tendring District Local Plan, with particularly reference to Bradfield. The landholding we own at Grasmere, The Street, Bradfield is currently split, with a proportion of the plot being included within the adopted Local plan boundary and the remainder excluded. We submitted our full plot for consideration. We respectfully request that the Council reconsider the current boundary designation and include the entirety of our landholding within the Bradfield Local Plan as part of the revision process. On the attachment, our property and garden is outlined in blue.	Comment	We have reviewed this representation and SDB for Bradfield but maintain that the proposal represents a backland style development which would be out of character of the area and proposed access would be detrimental to surroundings neighbours.
Community Representatives					
953	3473	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1110	3821	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We support the Settlement Development Boundaries proposed in the Spatial Strategy, but strong consideration must be given to give formal protection to areas with special characteristics such as Ecology, Heritage, and that could suffer considerable Landscape impact from potential development.	Support	This representation is noted. Policy SPL2 includes wording that discourages development outside of settlement development boundaries. Development will generally be refused unless other policies within the Local Plan or material considerations justify otherwise. Chapter 7 of the Local Plan includes policies which protect the natural environment, rural character, and heritage from development.
276	3964	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	Where settlement boundaries are defined as part of the local plan, these should be adhered too in all circumstances and no development should be allowed to take place outside of defined settlement boundaries, other than in exceptional circumstances. Self build and custom housebuilding plots considered outside of settlement development boundaries under policy LP7, should only be allowed if they abut the settlement development boundary and are for single dwellings only.	Comment	Comments are noted. However, it is considered that what is proposed in this representation is too restrictive. Indeed, some development is more appropriate outside of the SDB.
235	6837	Alresford Parish Council (Mr Matt Cooke, Alresford Parish	We believe Settlement Development Boundaries must be fully respected and that no new housing should be permitted outside these boundaries.	Comment	This representation is noted. Policy SPL2 includes wording that discourages development outside of settlement development boundaries. Development will generally be refused unless other policies within the Local Plan or material considerations justify otherwise.

		Council Clerk) [235]			
244	13640	Ardleigh Parish Council (Ardleigh Parish) [244]	The Parish Council emphasises the importance of: • Maintaining the Fox Street settlement boundary. • Protecting open countryside as a buffer. Without intervention, there is a real risk of coalescence between Colchester and Ardleigh, eroding village identity. Request: Strengthen and protect strategic green gaps and buffer zones.	Comment	The Council has updated its Strategic Green Gaps study, and it is the Council's intention to strengthen rather than reduce this designation.
258	14164	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly support the new additions to this policy in particular' look to refuse planning permission for new development unless there are specific policies in this Local Plan or other material considerations that either allow or would justify otherwise.'	Support	This is noted and the support is welcomed.
Members of the Public					
969	3582	Mr Scott Gilmour [969]	Managing urban sprawl is important to prevent car dependency and routing wildlife away from habitats. Particularly in rural areas that do not have access to convenient public transport. However, settlements with empty space close to railway stations should have their Settlement Development Boundaries reconsidered. Although to prevent unnecessary sprawl, development should be consolidated around the station and discourage the construction of detached single family housing in the centre. This would emphasise use of the rail and bus network for travel, justifying improvement of the current service and further investment into the local area, providing a positive feedback loop for residents.	Object	The Council agrees that development should be placed in areas that are most sustainable. However, in order to meet the new housing targets set by the Government, it is inevitable that some development must take place in areas that are further away from railway stations and other transportation hubs. Chapter 8 of the Local Plan includes policies which promote active travel networks throughout the District, and other policies in Chapter 5 set out the density requirements for settlements. Please see the appropriate chapters for more information.
1066	3748	Mr Gavin Tuff-Lacey [1066]	Settlement boundaries are critical and should be defended rigorously, however, the exception of the garden villages must not be used as a loophole. Those boundaries must be fixed too to prevent spread. I also refer to my comment about the location of those garden villages which are ill conceived.	Support	The Council agrees settlement boundaries should be preserved to prevent the sprawl of development. Although the Garden Villages have no settlement boundaries in the Regulation 18 Version of the Local Plan, this will be addressed as development moves forward with these proposals and DPD's are produced.
1066	3754	Mr Gavin Tuff-Lacey [1066]	Settlement boundaries are vital for preservation of community. The garden villages are ill conceived and provide loopholes to those boundaries.	Comment	The Council agrees settlement boundaries should be preserved to prevent the sprawl of development. Although the Garden Villages have no settlement boundaries in the Regulation 18 Version of the Local Plan, this will be addressed as development moves forward with these proposals and DPD's are produced.
581	4089	Mrs Sally Webb [581]	Bradfield has been chosen as perhaps being able to put up 100 new houses, completely changing the dynamic of the village. The plot chosen is not within walking distance of the local school [which is full]; we have no doctors surgery and the roads surrounding the plot as extremely busy with the new traffic cutting through from developments in Mistley. No	Object	This representation is noted. The Council have provisionally suggested the reduction of dwellings on site MSA9 from 100 to 20. This will significantly reduce impacts on local infrastructure. Please find more information within Chapter 9 of the Local Plan.

			jobs available in the village, apart from perhaps the care home; once again low paid jobs for expensive houses.		
1383	4238	Mrs Joanna Thornicroft [1383]	Development must take priority where there is existing infrastructure, healthcare, education and employment opportunities. The proposal at Wrabness fulfils none of these. The fact that there is a parcel of land that was proposed during the call for sites does not mean this is a suitable piece of land for development	Object	Whilst this representation is noted, housing allocations within the Local Plan have been assessed based on infrastructure, environmental constraints, retail/ job opportunities, and other factors. The site in Wrabness has been appropriately assessed through the robust evidence base and allocated a proportionate amount of housing based on the characteristics of the settlement. Although concerns with regard to new development are noted, the Council has chosen an approach to development which disperses housing across the District so that new housing targets set by the Government can be met.
1417	4389	Mr reginald tricker [1417]	can't see the justification for this to be a separate settlement to Weeley itself, as it now has very few of its own services aside from the garden centre and school. it also appears that Weeley Service Station, Weeley Crematorium nor Weeley Church are in either Weeley or Weeley Heath - is this remiss? (not to mention Gutteridge Hall Lane and further reaches of Bentley and Rectory roads)	Comment	Comments noted and a change to the wording in the hierarchy has been made.
571	4424	Mrs Sian Savage [571]	The Neighbourhood Plan for Brightlingsea would not support development outside of the settlement boundary due to the impact on the local environment and wildlife and additional pressure on local infrastructure. The SAH4 site is located outside of the settlement boundary.	Comment	Noted. The Council has removed the allocation in Brightlingsea (SAH4) from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, it is suggested that two smaller sites are included within the urban area of Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea. Concerns around nature and the environment are considered within other policies in the Local Plan.
1301	13722	Ian Keath [1301]	Re: The Oaks, Clacton Rd, Weeley Heath. With reference to the above site in Weeley Heath it is currently outside the existing Local Plan development limits. I am writing to urge the Council to ensure it remains so. This is a rural area served by the very busy Clacton main road. Any further housing development will interfere with the designated free flow of traffic on this road and increase highway danger, particularly on this very dangerous bend. In addition there is already a sufficient supply of housing land in this area. The owners of this site have been continually submitting totally unsuitable planning applications for the past few years. This demonstrates they are intent solely on gross overdevelopment of the site in order to obtain as high a price as possible for the property. The valuable local habitat provided by this site is irreplaceable. The owners have no interest in preserving or even enhancing this rural locality. Including this site in the new Local Plan would create a disastrous planning precedent.	Comment	The representation is noted. The Oaks, Clacton Road, Weeley Heath is not proposed for allocation through the Local Plan Review and no amendment to the settlement development boundary is proposed.

Policy SPL2: Settlement Development Boundaries

Summary of Representations

Policy SPL2 received a range of representations from developers, landowners, parish councils, community representatives and members of the public. A number of respondents supported the principle of defining Settlement Development Boundaries as a clear mechanism for directing growth towards existing settlements and distinguishing between areas where development may be acceptable in principle and areas of countryside where development should be more carefully controlled. Support was also given where boundaries provide certainty for communities, applicants and decision-makers, and where they help to ensure that growth is focused in locations with access to services, facilities and infrastructure.

Several landowners and developers requested amendments to specific Settlement Development Boundaries to include additional land for housing, employment or mixed-use development. These representations argued that some sites are well-related to existing settlements, capable of delivering sustainable development, and able to contribute towards meeting the District's housing requirement. In some cases, respondents considered that the proposed boundaries were too tightly drawn and failed to recognise the functional relationship of land with the built-up area. Others suggested that particular settlements should be expanded to include additional land where there are opportunities for logical rounding-off, previously developed land, or development that could support local services.

A number of objections were also raised to proposed extensions or allocations within or adjacent to settlement boundaries. Parish councils and members of the public expressed concerns that changes to boundaries could lead to excessive growth, urban sprawl, the loss of countryside, harm to rural character, pressure on roads, schools, healthcare and drainage infrastructure, and increased reliance on the private car. Concerns were also raised where settlements were considered to have limited services and public transport options, with respondents arguing that further boundary extensions in such locations would conflict with the objective of sustainable development. Some representations also questioned whether certain smaller settlements should have a defined boundary at all, particularly where facilities are limited or where recent appeal decisions have questioned their sustainability.

In response, no fundamental amendments were made to Policy SPL2 or its supporting text. The policy wording was updated to take into account the introduction of Supplementary Plans, rather than DPDs. Overall, the Council considers that Policy SPL2 remains an appropriate mechanism for managing development within and around settlements.

Policy SPL3: Sustainable Design

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
791	3707	Sport England (Mr Roy Warren, Planning Manager) [791]	This policy should consider how the design of development can encourage healthy lifestyles and physical activity. A criterion should be added requiring the design and layout of the development to provide opportunities to support healthy and active lifestyles. Sport England's Active Design principles which are referenced in Policies HP1 and LP3 as well as the Essex Design Guide which has embedded the Active Design principles can be used to help support the delivery of this criterion in practice. The inclusion of such a criterion would also accord with paragraphs 96 and 129 of the NPPF.	Comment	The Council agrees that well-designed development should support healthy and active lifestyles. The updated design policies, particularly LP3 (Design Principles) and LP4, together with Policy HP1, already place considerable emphasis on creating attractive, accessible and walkable environments, active travel, high-quality public realm and green infrastructure. The supporting text references relevant design guidance, including Active Design principles and the Essex Design Guide. The Council considers that the combined effect of these policies adequately addresses the issue without the need for a specific additional criterion within SPL3, although supporting text may be strengthened to reference healthy place-shaping and active design more explicitly.
926	3844	National Landscape Office (Beverley McClean, National Landscape Planning Officer) [926]	This policy could be strengthened by the referencing sensitive or appropriate lighting as an important part of sustainable design in Criteria b.	Comment	The Council recognises that lighting can have significant impacts on landscape character, tranquillity, biodiversity and dark skies. Policy SPL3 already seeks to minimise environmental impacts and ensure development responds positively to its context, while LP3 and LP4 provide a stronger framework for place-sensitive design. The Council agrees that additional supporting text referencing appropriate and sensitive lighting design could improve clarity and ensure consistency with landscape and biodiversity objectives.
349	4289	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	comments made by health partners	Comment	Policy SPL3 seeks to ensure that development supports healthy communities through sustainable design, accessibility, active travel, green infrastructure and the provision of necessary infrastructure. These matters are also addressed through other Local Plan policies relating to health, wellbeing, open space and infrastructure delivery. The Council is satisfied that the Plan provides an appropriate framework for promoting healthier places.
6	13456	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water notes that policy clauses n. and o. both refer to protection against unacceptable levels of pollution, including from existing or committed uses. We deduce from this statement that this includes introducing an 'agent of change' to an area regarding impacts on existing infrastructure and employment sites. Anglian Water requests that the supporting text should include specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development or other uses where sensitive receptors are introduced) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of our essential infrastructure.	Comment	The Council welcomes Anglian Water's support for the policy's approach to protecting amenity and avoiding unacceptable impacts from existing and committed uses. The "agent of change" principle embedded within Policy SPL3 is intended to apply broadly, including utility and wastewater infrastructure where appropriate. The Council agrees that supporting text could usefully acknowledge the importance of safeguarding the operational effectiveness of essential water and wastewater infrastructure and avoiding the introduction of sensitive receptors in unsuitable locations. The relationship between sustainable design, water efficiency, drainage, sewerage and flood resilience is already addressed through Policies PPL1 and PPL5. The Local Plan should be read as a whole, and the Council considers duplication within SPL3 unnecessary. Cross-referencing may, however, be strengthened through supporting text.

			Whilst this policy references climate change adaptation measures relating to energy efficiency and embodied carbon policies, this should also reference development and flood risk (PPL1) and water conservation, drainage, and sewerage (PPL5). These policies are equally relevant in creating well-designed resilient development, which incorporate both climate change mitigation and adaptation measures.		
1654	13487	Natural England (Jonathan Burt) [1654]	We are pleased to note that three new Garden Communities are being proposed at locations that are inland from the coast. These new Garden Communities should, because of their large scale, be able to offer the most favourable opportunities to provide large areas of Suitable Alternative Natural Greenspace (SANG) adjacent to where people live, giving new residents space to walk their dogs and exercise away from coastal locations. In addition to the proposed new Garden Communities, smaller developments close to the coast are likely to require the provision of a SANG to NE's SANG Standard (2021) to adequately mitigate recreational pressure on the Essex Coast Habitats Sites. This will include the proposed three new housing allocations on the edge of Clacton-on-Sea.	Comment	The provision of Suitable Alternative Natural Greenspace (SANG), recreational disturbance mitigation and protection of the Essex Coast Habitats Sites are addressed through the Habitats Regulations Assessment and relevant strategic and environmental policies. The proposed Garden Communities provide opportunities for strategic green infrastructure and accessible natural greenspace, including SANG's. The Council considers these matters are more appropriately addressed through the relevant habitat mitigation and green infrastructure policies rather than specific amendments to Policy SPL3.
823	13518	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Agree - The Mineral and Waste Planning Authority (MWPA) welcome the need for all new development to have regard to the most up to date adopted Essex Mineral Local Plan. All new development must also have regard to the most up to date adopted Essex and Southend-on-Sea Waste Local Plan (WLP). The WLP promotes waste reduction, re-use and recycling, sustainable building design and the use of sustainable materials, including in relation to their procurement, in the construction of new development or redevelopment. Although the Plan encourages early use of design review tools and frameworks, it makes no reference to Natural England's Green Infrastructure Framework standards, including the Urban Greening Tool or the Essex Green Infrastructure Standards. The Vision promotes a landscape led approach, and Part A of Policy SPL3 supports this by requiring development to respect and enhance landscape character, retain key ecological and landscape features, and integrate hard and soft landscaping in the design early on. However, Green Infrastructure is treated in general terms rather than as a measurable standard, and paragraph 3.69 provides no explicit requirement for compliance with the Essex Green Infrastructure Standards. The reference to the use of GI technologies in Part C as measure to address climate resilience. -led approach. It is recommended to add additional text to Policy SPL3 Part B's practical requirement to support objective 4 and 8 in delivery of multifunctional GI, BNG and LNRS priorities. m. the development must incorporate multifunctional Green Infrastructure that enhances ecological connectivity, contributes to climate resilience and supports Local Nature Recovery Strategy priorities.	Support	The Council agrees that multifunctional green infrastructure plays a critical role in delivering biodiversity enhancement, climate resilience, ecological connectivity and health benefits. The updated design policies LP3 and LP4 provide a strengthened framework for landscape-led design, green infrastructure integration and nature recovery objectives. The Council will consider whether references to GI standards and Local Nature Recovery Strategy priorities can be strengthened within supporting text. The Council also recognises the importance of sustainable construction practices, waste minimisation, reuse and recycling. These matters are addressed through existing waste planning policies, Building Regulations and the wider development management framework. The Local Plan should be read alongside the adopted Minerals and Waste Plans.

			Local Plan policies covering the sustainability of development should recognise that the sustainability of a development begins with its construction. The Local Plan should include reference to promoting waste reduction, re-use and recycling, sustainable building design and the use of sustainable materials, including in relation to their procurement, in the construction of new development or redevelopment, as per Policy S4 of the MLP.		
939	13617	National Highways (Mark Norman, Spatial Planner) [939]	It is noted that the draft submitted version of the local plan and identified allocations will increase the number of residents in proximity of the SRN. It is likely that these locations will be impacted by noise pollution from the SRN. National Highways will not permit the installation of noise barriers on its land. The proximity of development close to the SRN also raises the potential for exceedances of air quality standards for which extraordinary measures, such as permanent speed restrictions may need to be considered, although it is recognised that air quality will improve with the take up of fully electric vehicles. While several polices in the plan set out requirements for developments to reduce the impact on or improve local air quality, this does not directly relate to the SRN and what mitigation may be required. We will continue to work proactively with yourselves on these matters. At this stage we would recommend the inclusion of a specific policy that identifies how air quality and noise impacts would be monitored and managed, and what interventions may be required. National Highways will not accept third party connections to its drainage systems. Developments must not add additional runoff to existing systems, and capacity will need to be checked and upgraded if necessary.	Comment	Policy SPL3 already requires development to avoid unacceptable impacts arising from noise, air pollution and other environmental effects. Detailed assessment and mitigation of Strategic Road Network impacts are addressed through transport, environmental health and development management processes, together with national guidance. The Council considers that a separate policy specifically for Strategic Road Network noise and air quality impacts and monitoring is not necessary, as these matters are adequately addressed through the wider policy framework. The Council agrees that development must not adversely affect highway drainage infrastructure and this matter is addressed through detailed design requirements and consultation with relevant infrastructure providers.
148	14465	Environment Agency (Environment Agency) [148]	For flood risk, we recommend adding wording to require development to reduce flood risk, re-naturalise watercourses where possible, and integrate sustainable drainage to enhance amenity and biodiversity reflecting emerging NPPF policy. The Plan lacks an overall objective or policy on contaminated land and should include one. Policy SPL3 is welcomed but should be strengthened to ensure sites are suitable for use, follow land contamination risk management processes, and meet legislative requirements. Supporting text should reference relevant guidance. Stronger emphasis on redeveloping contaminated land is advised, with clearer identification and allocation of such sites by the Local Authority. (PLEASE REFER TO ATTACHED DOCUMENT FOR REWORDING SUGGESTIONS)	Comment	Policy SPL3 already requires development to reduce flood risk, incorporate sustainable drainage and enhance biodiversity. These requirements are supplemented by Policy PPL1 and other water management policies. The Council will consider whether supporting text can be strengthened to reference wider benefits associated with watercourse restoration and nature-based solutions. In relation to contaminated land, national policy and legislation already require land to be suitable for its intended use. The Council recognises the importance of land contamination considerations and will review whether additional supporting text or cross-references are warranted. However, a separate strategic policy on contaminated land is not considered necessary to ensure soundness.

Businesses, Landowners and Developers					
136	4405	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	This policy follows the lines of similar types of policies found sound in many more recently adopted development plans.	Support	This is noted and the support is welcomed.
1422	4414	M Scott Properties Ltd (Scott Properties) [1422]	Consider Part A b) policy as currently drafted requires clarification with revised wording proposed to ensure the policy is effective and consistent with national policy in accordance with paragraph 36 of the NPPF 2024.	Comment	Criterion A(b) seeks to ensure development positively responds to local character and context. The Council considers the wording sufficiently clear, effective and consistent with national policy. No substantive amendment is considered necessary.
1638	4421	Lichfields (Amy Jones, Planner) [1638]	Our client supports the ambition for all development to be well designed and positively contribute to the quality of the local environment, as required by Policy SPL3 Sustainable Design. The requirements should not be too onerous, so as not to impede the delivery of development.	Comment	The Council considers that the policy strikes an appropriate balance between securing high-quality sustainable design and ensuring development remains viable and deliverable. The criteria are consistent with national policy and reflect established good practice.
134	5632	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	Recommend removing the reference to the EPOA Parking Standards from Policy SPL3 (Sustainable Design) so that future parking guidance can be sourced elsewhere.	Comment	The Council notes the comments regarding references to EPOA Parking Standards. The current reference provides clarity and directs applicants towards the adopted parking standards applicable within Essex. The policy already refers to the relevant standards as amended or replaced over time, ensuring flexibility. Retaining the reference improves certainty and consistency in decision making.
1439	13872	Catesby Estates [1439]	Catesby broadly support the overall objectives of Draft Non-Strategic Policy SPL3, which seeks to secure high quality and sustainable design. However, it is considered that a number of criteria within Parts B and C duplicate matters that are more appropriately addressed through separate regulatory regimes, including Building Regulations, and construction management controls. For example, criterion (i) relating to greenhouse gas emissions is already governed through the Building Regulations, whilst criterion (q) relating to a 'considerate constructors' scheme' relates to voluntary construction practices rather than statutory requirements and should not be included in the Draft Policy. It is therefore recommended that the policy be amended to focus on planning considerations only, avoiding duplication of other legislation, to ensure it remains effective and consistent with the approach set out in the NPPF.	Comment	The recommended criteria relating to climate change, sustainable construction and development impacts are considered to be legitimate land-use planning matters consistent with national policy objectives relating to sustainable development and climate resilience. The policy is intended to influence upfront planning matters such as site layout, design and construction outcomes rather than duplicate Building Regulations. The Council remains satisfied that the policy is justified and effective.
1659	14288	Colne Medical Centre (Louise Weston, Assistant Practice	Policy SPL3 (Sustainable Design) states that development should not place a burden on existing infrastructure and services. This proposal would clearly do SO in respect of primary care provision.	Comment	Whilst the Council notes this representation, viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need

		Manager) [1659]			to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
1692	14344	Lewis & Scott Homes [1692]	We note that this policy is the same as written in the adopted plan. Since the adoption of the current plan the Government has updated the NPPF, which is the version referred to elsewhere in this draft plan that this consultation exercise relates to. We note that criterion l requires development to reduce flood risk. We OBJECT to this wording as it is in direct conflict with the requirements of the NPPF, which states 'when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere' (para 181). To address this, we suggest that criterion l is amended as follows: "the development does not increase reduces flood risk elsewhere and integrates sustainable drainage within the development (where possible), creating amenity and enhancing biodiversity." We note that criterion n lists pollution aspects that the development should not have 'unacceptable levels' of. This is an ambiguous requirement and does not allow the policy-reader to understand what is expected from a development proposal. We suggest that this is amended to either provide clarity or require a developer to demonstrate that the proposal incorporates measures to minimise these policy levels through the design or control of the development.	Object	The intention of criterion (l) is to ensure that development contributes positively to flood risk management and climate resilience through sustainable drainage and good design. The Council acknowledges that alignment with current national policy wording may improve clarity and effectiveness. Amendments to clarify that development should not increase flood risk elsewhere and should incorporate sustainable drainage measures have been incorporated. Regarding criterion (n), the phrase "unacceptable levels" reflects established planning terminology and allows consideration of site-specific circumstances and technical evidence. The Council is satisfied that the wording remains effective when applied alongside relevant environmental standards and guidance.
Community Representatives					
953	3474	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1550	13970	PACE (John Hall) [1550]	Tendring Council has passed a Motion that it will not give planning permission for new housing developments where the developer is using Restrictive Covenants in House Sale Contracts to prevent the new house owners from installing sustainable features such as Roof Top Solar Panels. This should therefore be included in both these policies.	Comment	Whilst these comments are noted, the Council would not be able to refuse applications based on restrictive covenants, as they are not a material planning consideration.
34	14266	Colchester Cycling Campaign (Mr William Bramhill, Secretary) [34]	The EPOA guide stresses that "cycle parking should aim to be more convenient than car parking" to encourage everyday use. It is in the interests of developers to make healthy living a feature of their homes to boost the impression of better quality of life and increase saleability. Covered, secure cycle parking, some with electric power points, should be adjacent to the side or front of all properties. This could be done in several ways, with private covered bikeports; on-street cycle hangars, or shared, covered sheffield racks curated under a development management contract in front of all properties. We question the need for garages: few people use them for their original purpose. The developer could instead provide a bikeport or a ground-level dedicated	Comment	Policy SPL3, together with transport, design and parking policies, promotes sustainable travel choices and requires appropriately designed cycle parking and storage facilities. Detailed standards are more appropriately addressed through design guidance, parking standards and development management rather than within strategic policy wording. The updated design policies LP3 and LP4 further strengthen expectations regarding active travel and inclusive design.

			storage area like a small garage that is suitable for bike storage. Access to secure parking should be wide enough to take a tricycle, adapted cycle or cargo bike. The default arrangement for apartments should be internal bike parking on the ground floor. NB, while much cycle parking in the Netherlands is outside and uncovered, this would not work in the UK. European bikes tend to have hub gears and enclosed chains and as such they are more resilient to wet weather.		
Members of the Public					
969	3583	Mr Scott Gilmour [969]	Overall agreement with The Policy. Part A: Design. Don't be hesitant about regenerating the core of towns that have grown significantly, reflecting this with higher density of homes and mixed-use retail in the centre. Part B: Practical Requirements. Improvements to alternate modes of travel is highly valued as well as development beside transit corridors. Part C: Impacts and Compatibility. Prioritise sustainable travel options and that the impact of cars is considered and mitigated accordingly. Expressing hope that new developments will be environmentally friendly and already electrified. With heat pumps, induction cooking and integrated solar panels.	Support	Support for this policy is welcomed. Whilst the Council agrees town centre improvements, environmental protections and active/ alternative travel methods are important to include in the Local Plan, these topics are discussed in the relevant chapters, and are therefore, not necessary within Policy SPL3.
981	3600	Ms Danielle Williams [981]	Development at this location would extend the settlement edge into open countryside close to Stour Wood and the Stour Estuary landscape. The rural setting and wooded backdrop form an important part of the village character and visual approach. The Plan does not demonstrate how 30 dwellings can be accommodated without materially altering this transition from village to countryside. A suburban form or excessive built mass would erode rural distinctiveness, harm landscape character and reduce the visual separation between built form and woodland edge. The allocation should require a landscape-led approach or be reconsidered given its sensitive setting.	Object	Ecological impacts, biodiversity interests, access arrangements and infrastructure constraints would require detailed assessment through any future planning application. The Council is satisfied that the allocation has been appropriately assessed through the Local Plan process and that environmental considerations can be addressed through existing planning policies. Please see Chapter 9 for more information on MSA28.
981	3601	Ms Danielle Williams [981]	Access must be safe and the highway network must safely accommodate additional traffic. Narrow country lanes, limited passing places and lack of pavements mean even modest increases in vehicle movements can create conflict, obstruction and safety risk. Construction traffic over a prolonged period would intensify these impacts. The Plan does not provide detailed transport modelling or mitigation proposals specific to Wrabness. Without clear and deliverable highway evidence, this allocation is not justified.	Object	Traffic concerns are acknowledged. The Council has updated its transport modelling to understand where upgrades to roads, junctions, and other forms of transport infrastructure are needed to support new development. This document, alongside cooperation with the relevant infrastructure providers, will mitigate adverse impacts, such as obstruction and safety risks. Specific transportation requirements and access routes for MSA28 will be addressed at the planning application stage, rather than within the Local Plan.

981	3602	Ms Danielle Williams [981]	Development at this site would extend the settlement edge towards Stour Wood and the wider estuary landscape, eroding the important transition between village and countryside. The wooded backdrop and open approach form part of Wrabness's rural character and visual identity. The Plan does not demonstrate how 30 dwellings can be accommodated without suburbanising this edge or harming landscape setting. Increased recreational pressure on nearby woodland and habitats is also likely. Without a clear landscape-led masterplan, ecological assessment and long-term management strategy, the proposal conflicts with the requirement for development to protect and enhance local character and environmental quality.	Object	Ecological impacts, biodiversity interests, access arrangements and infrastructure constraints would require detailed assessment through any future planning application. The Council is satisfied that the allocation has been appropriately assessed through the Local Plan process and that environmental considerations can be addressed through existing planning policies. Please see Chapter 9 for more information on MSA28.
526	3737	Mr kevin millar [526]	The main traffic bottle neck currently in the area is from exactly were 900 new homes are being placed in Weeley. This new estate along with the traffic from other new sites along the route will bring traffic to a stand still	Comment	Traffic concerns are acknowledged. The Council has updated its transport modelling to understand where upgrades to roads, junctions, and other forms of transport infrastructure are needed to support new development. This document, alongside cooperation with the relevant infrastructure providers, will mitigate adverse impacts, such as obstruction and safety risks.
616	3917	Mr Kevin Everitt [616]	With regards to MSA24 & MSA25 development of these two cannot possibly relate well to the surrounding environment particularly MSA24 which is the last open space within Weeley Heath. Any access to MSA24 & MSA25 can only increase the danger and risk of accident in Mill Lane and Bentley Road, both are very busy country lanes with Mill Lane heavily used by walkers, children, dogs and horses with Bentley Road heavily used by large farm machinery and with restricted and narrow access at the Memorial Corner with large lorries accessing the Nursery.	Comment	The concerns regarding Mill Lane, traffic and infrastructure are noted. The allocation would not be served solely from Mill Land, and detailed access arrangements would be determined through the planning application process. Infrastructure and highway impacts would be assessed in consultation with relevant statutory bodies. No modification is proposed.
1333	3952	Mr Matthew Willis [1333]	With regard to proposed housing allocations in Great Oakley, MSA15 and MSA16: A b - siting of MSA15 relates poorly to surroundings; A c - MSA15 will destroy the existing landscape and skyline to the NW, a characteristic N Essex view across farms as far as Holbrook School. A d - MSA15 destroys view that has been outlook from the village since the Middle Ages. B a Wix Rd is completely inadequate for access to 50 homes near a school - traffic already dangerous. B j - MSA15 wcompromises light, outlook and privacy for households on School and Wix Rd	Object	The Council notes concerns regarding the loss of views; however, such matters are not material planning considerations and therefore cannot be taken into account through the Local Plan process. The Council has updated its transport modelling to inform where upgrades to transport infrastructure are needed to support growth, and the Local Plan contains policies which protect rural character and the local landscape in Chapter 7.
1333	3957	Mr Matthew Willis [1333]	Allocations MSA15 and MSA16 in Great Oakley do not meet sustainability or practicality requirements. b MSA15 does not relate well to surroundings in terms of its siting. c, d 50 homes outside the boundary of the village changes the character irrevocably, ruining the skyline that has existed for centuries, over farms across Great Oakley Brook and stretching all the way to the Stour where Holbrook school is visible on the horizon. f Wix Road inadequate access for 50 homes, near school and with farm and industrial traffic, already dangerous. j, m Outlook and privacy compromised for residents on Wix/School Roads	Object	The Council notes concerns regarding the loss of views; however, such matters are not material planning considerations and therefore cannot be taken into account through the Local Plan process. The Council has updated its transport modelling to inform where upgrades to transport infrastructure are needed to support growth, and the Local Plan contains policies which protect rural character and the local landscape in Chapter 7.
580	3990	Mrs Caroline Mitchell [580]	There are some well thought through criteria listed in Sustainable Design which should mean new buildings and altered ones not only belnd in with existing homes but pre handle some of the challenges such as the impact on our roads and safety.	Comment	Support for SPL3's criteria is welcomed. Whilst the Council agrees the adequate road infrastructure must be provided through development, this is addressed in Chapter 8 of the Local Plan and through site-specific requirements. The Council has updated its transport modelling to inform on where upgrades to road infrastructure are needed to support growth.

581	4092	Mrs Sally Webb [581]	Any new development should be as self sustainable as possible - solar panels; air source heat pumps - or for larger development ground source heat pumps. Recyclable grey water treatment.	Comment	Policy PPL10a sets out measures taken in homes and buildings to become more self - sufficient through operational energy and renewable energy sources. Please see Chapter 7 for more information.
1340	4181	Mrs Helen Francis [1340]	The village is not suitable for a large number of extra homes.	Comment	The Council considers that the allocation represents a modest and proportionate level of growth that can be accommodated within the village. The site is considered suitable, available and achievable and capable of contributing towards the District's housing requirement. No modification is proposed.
1362	4205	Mrs Kathrine Reindel [1362]	Practical objections: Firstly, Road safety would be compromised. The school on the corner of Wix Road causes severe congestion at picking up and dropping off times. Children at present and in the past have to walk along on the road to get to their vehicle. There are parked cars from the corner to well past the speed limit signs. At these times there are also buses, and Large Lorries trying to get through, with children everywhere it is a very dangerous road. We have many Lorries and some tractors using this road which is fairly narrow.	Object	Concerns with regard to road safety are noted. The Council has updated its transport modelling to identify where additional road infrastructure and transportation facilities are needed to support infrastructure. The Council will also continue to work with the relevant stakeholders and infrastructure providers to ensure these updates are delivered.
1383	4239	Mrs Joanna Thornicroft [1383]	The proposed development at Wrabnesd will not make a positive contribution to sustainable development. Whilst it may be hidden behind existing dwellings, It's actual existence has a negative consequence to It's surroundings. It does not enhance local landscapes and I would question its access considerations as these have not been detailed. Its ecological impact will be negative. Access to the site has not been determined to be safe or practical. How can 30 new houses in such an environmentally sensitive site. Be positive to the environment or climate change.	Object	Ecological impacts, biodiversity interests, access arrangements and infrastructure constraints would require detailed assessment through any future planning application. The Council is satisfied that the allocation has been appropriately assessed through the Local Plan process and that environmental considerations can be addressed through existing planning policies. Please see Chapter 9 for more information on MSA28.
1318	14092	Elizabeth Artindale [1318]	Nothing about sustainable design	Comment	Noted.

Policy SPL3: Sustainable Design

Summary of Representations

Representations generally support the objectives of Policy SPL3 in promoting high-quality, sustainable and locally distinctive development. Sport England suggested strengthening references to healthy place-making, active design and physical activity, and the National Landscape office recommended additional considerations for sensitive lighting and dark skies. Anglian Water highlighted there should recognition of utility infrastructure constraints, particularly for wastewater infrastructure. Similarly, Essex County Council and Natural England requested greater emphasis on green infrastructure standards, as well as biodiversity and nature recovery. The Environment Agency and some developers asked for clarification on flood risk wording and sustainable drainage requirements, and National Highways requested stronger consideration for air quality, noise, and drainage impacts within the Policy. Other representations had concerns with regard to the policy's duplication of Building Regulations and other regime. Other suggestions related to cycling provision, renewable energy technologies, and architectural design approaches.

In response, the Council considers that Policy SPL3, read alongside updated Policies LP3 and LP4 and the wider Local Plan policy framework, provides a robust and comprehensive approach to sustainable design. Most matters raised are already addressed through existing policies, supporting guidance, national policy or separate regulatory regimes. A limited number of minor modifications to supporting text have been considered to improve clarity, particularly in relation to active design, sensitive lighting, green infrastructure, wastewater infrastructure safeguards and flood resilience. No fundamental changes to the policy's overall approach are considered necessary.

CHAPTER 4: HEALTHY PLACES

Policy HP1: Improving Health and Wellbeing

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council Response
Technical Stakeholders					
187	3588	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	This policy promotes "active travel" through walking, wheeling and cycling, yet it completely omits equestrians and the statutory Public Rights of Way network that includes bridleways and byways. Tendring is a rural district that should provide essential, safe, off-road routes for riders, PRoW users and other vulnerable groups. Ignoring equestrians contradicts the district's rural character, undermines safety, and overlooks a legally protected network that directly supports physical activity, wellbeing and countryside connectivity. This policy should be amended to explicitly include horse riders alongside walkers, wheelers, cyclists and PRoW users to ensure genuinely inclusive, multi-user access.	Object	This representation is noted. Policy CP1 of the Preferred Options Local Plan includes reference to Public Rights of Way. The policy states that development should 'ensure enhanced connectivity to existing public rights of way, including footpaths and bridleways, and where possible create new links that improve access to the wider countryside and green infrastructure network, with particular emphasis on connections to the Sunshine Coast Greenway.' As the Plan should be read as a whole, no further change is required.
187	3591	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	This policy promotes "active travel" through walking, wheeling and cycling, yet it completely omits equestrians and the statutory Public Rights of Way network that includes bridleways and byways. Tendring is a rural district that should provide essential, safe, off-road routes for riders, PRoW users and other vulnerable groups. Ignoring equestrians contradicts the district's rural character, undermines safety, and overlooks a legally protected network that directly supports physical activity, wellbeing and countryside connectivity. This policy should be amended to explicitly include horse riders alongside walkers, wheelers, cyclists and PRoW users to ensure genuinely inclusive, multi-user access.	Object	As above.
791	3708	Sport England (Mr Roy Warren, Planning Manager) [791]	The policy is supported but consideration should be given to securing financial contributions from development towards projects/initiatives that support physical activity. This is pertinent for smaller developments where there are limited opportunities on-site. For example, Basildon Borough Council has successfully secured financial contributions through planning obligations towards its Local Delivery Pilot capital projects. Securing such contributions could assist the Council to build on the success of the Local Delivery Pilot projects that are already being delivered in the district such as Pedal Power and the associated cycleway improvements.	Comment	Whilst this representation is noted, financial contributions are typically requested at the application stage or as part of a design code, rather than within the Local Plan itself. The Council may prepare health-related planning guidance with specific projects in the future, but this will not be proposed prior to the adoption of the Local Plan.
349	4290	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Positive that HP1 recognises the link between planning, healthy environments and reducing health inequalities. This provides an opportunity to support healthy ageing, promote independence and reduce social isolation for all residents. • HP1 emphasises active lifestyles and access to green and blue spaces but does not reference the role of inclusive and accessible environments in supporting health and independence for all residents and particularly older people and people with disabilities and/or mental health needs. • HP1 does not reference the importance of accessible routes and clear wayfinding, which are essential to support independence and inclusivity for	Comment	The comments here duplicate what ECC say in their representation so those should be referenced. It is required to cross-reference to Policy DI1, however, the Plan should be read as whole so this change will not be recommended. The wording around HIA should be carried forward.

			all residents, particularly older people, people with disabilities and/or mental health needs. • Reference to the Essex Design Guide -Inclusive Design would strengthen HP1 by setting expectations for inclusive layouts, accessible public realm and neighbourhoods that support everyday mobility, inclusive communities and independence. • HP1 does not reference dementia inclusive design principles. Incorporating Essex and national guidance, including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024), would help ensure inclusive communities for all residents. HP1 could further support health outcomes by encouraging design that enables positive social interaction, inclusive communities and reduces isolation, helping people remain connected to their communities as they age. Next Steps / Alternative Wording “Developments will demonstrate compliance with the Essex Design Guide - Inclusive Design to ensure layouts, access routes and public realm support inclusive, accessible environments that enable independence for all residents. Developments will incorporate dementia-inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024) Design of the public realm and neighbourhoods will enable positive social interaction and inclusion, helping to reduce isolation and support wellbeing for all residents.”		
349	4291	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Comments from health partners The three fundamental shifts which are set through the NHS Ten Year Plan are mentioned. Forward planning for the ICB is still in a state of flux.	Comment	These comments are noted.
349	4292	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	The ICB has not previously agreed to the construction of a new Health & Wellbeing Centre in Clacton and the neighbourhood health strategy is still to be determined. Neighbourhood strategies are being worked on with the new ICB boundaries in mind, and it is not accurate to proclaim that a Health and Wellbeing Centre is in the plans for Clacton, currently. However, mitigation will be required in order to enable strategic planning for growth to influence Neighbourhood centre modelling in due course. Neighbourhood strategies are being worked on with the new ICB boundaries in mind, therefore, the ICB requests that it is made clear in future public communication that decisions have not been concluded. The ICB requests that TDC acknowledge it is not accurate to proclaim that a Health and Wellbeing Centre is in the plans for Clacton, currently. Health provision in	Comment	These comments are noted. Health partners and TDC Officers have been working closely on this policy, and these comments have generally been brought forward, in particular those comments that clarify the health provision in Clacton on Sea and also that these items h), i), j) and l) of Part B of the policy are removed.

			Clacton has been in the forefront of strategic work for the ICS and a number of projects have come forward to increase health service provision in Clacton in the last 5 years. Clacton has a thriving community hospital which has seen new services integrated as well as more capacity being provided. The community hospital is the chosen location for a Local Neighbourhood Health Centre, in line with the 10-year plan to improve access, quality and integration of care for local residents. The creation of additional healthcare capacity funded by, and to fully mitigate the impact of, developments in and around Clacton. This will entail making best use of existing estate by refurbishment, reconfiguration and extension, and requiring additional facilities if needed. To manage expectations with regard to new healthcare floorspace provision and ensure that the draft Policy aligns with related policies in adopted development plan documents, it is requested that items h), i), j) and l) of Part B of the policy are removed. Comments on the specific policies related to each growth area are provided In SAMU3, SAMU4, SAMU8, SAMU9.		
349	4293	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Clacton has a thriving community hospital which has seen new services integrated as well as more capacity being provided. The ICB might look to incorporate some health services into a new multiuse community hub, but at the moment the neighbourhood health strategy is still to be determined. The creation of additional healthcare capacity funded by, and to fully mitigate the impact of, developments in and around Clacton. This will entail making best use of existing estate by refurbishment, reconfiguration and extension, and requiring additional facilities if needed.	Comment	Noted.
349	4294	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	In order to determine the scope and scale of impact on healthcare facilities, it is requested that the final paragraph of draft Policy HP1 is amended to include a requirement for HIAs to assess the capacity of existing primary and acute healthcare facilities to accommodate the needs arising from proposed developments, which would then inform the scope, scale and nature of mitigation required to address the needs arising from the proposed scheme. The penultimate sentence should be amended to read: “The Health Impact Assessment should include an assessment of the capacity of existing healthcare facilities to accommodate the needs arising from the proposed development and recommendations on how positive health impacts could be maximised and negative impacts on health and inequalities avoided or mitigated”	Comment	These comments are noted. The proposed changes have been taken forward into the next iteration of the Local Plan.
849	7466	NHS Property Services Ltd (NHS Property Services) [849]	We welcome the inclusion of Draft Policy HP1 – Improving Health and Wellbeing and recommend that the Plan require early engagement with the local Integrated Care Board to set appropriate developer contribution mechanisms for health infrastructure. Part A of Draft Policy HP1 sets out the Council’s commitment to making sure that new developments promote healthier lifestyles and the long-term prevention of avoidable illness. NHSPS welcomes and supports the inclusion of policies which seek to improve health and wellbeing, and the requirement for Health Impact Assessment (HIA) for all development sites delivering 50 or more dwellings, all development in Use Class C2 (Residential Institutions) and all non-residential developments delivering	Support	The general support for the Policy is welcomed. Early engagement with the NHS and relevant ICB is logical and has been carried forward into a revised version of the Policy.

			1,000 square metres or more gross internal floor space as set out in Part A (a) of Draft Policy HP1. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. Part B of Draft Policy HP1 ensures the provision of medical and other healthcare services of the right type is provided in the right locations and at the right time to best meet the needs of the growing population, and sets out the implementation mechanism for healthcare infrastructure to be delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. NHSPS welcomes the recognition of health infrastructure as essential infrastructure and supports the expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development within both allocated site and elsewhere across the District. NHSPS supports the process to determine the appropriate form of developer contributions to health infrastructure through consultation with relevant health partners and/or through the findings of HIA. This ensures that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements. NHSPS recommends that the Local Plan makes clear reference to early engagement with the NHS and in particular, the relevant Integrated Care Board (ICB) in seeking contributions for health infrastructure and where new healthcare infrastructure is proposed as part of major/strategic allocations Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development, and should therefore be engaged with at the earliest stages possible.		
823	13521	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Policy HP1 positively recognises links between planning, health and reduced inequalities. However, it lacks sufficient focus on inclusive and accessible design, particularly for older people and those with disabilities or mental health needs. The policy should reference accessible routes, clear wayfinding and inclusive environments, supported by the Essex Design Guide. It could also better promote social interaction to reduce isolation. The absence of inclusive and dementia-friendly design principles is a significant gap; incorporating guidance such as EADDAT (2024) would strengthen outcomes and support independent, inclusive communities for all residents. **HP1 (Page 42-46) Part A** ECC welcomes Part A(d) requirement for developments to enhance the biodiversity network and deliver environmental protection and improvements. This compliments that green infrastructure contributes	Comment	Requests that the Policy include reference to accessible routes and clear wayfinding, as well as the request for reference to the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 224) have been taken forward.

			positively to health and wellbeing, supporting highquality placemaking and encourages community use of nature rich spaces. quality placemaking and encourages community use of nature-rich spaces. The addition of "attractive" aligns with the Plan's vision's landscape led approach and ensures that development delivers highquality Green Infrastructure that contributes positively to placemaking and community wellbeing led approach and ensures that development delivers high quality Green Infrastructure that contributes positively to placemaking and community wellbeing Next steps and alternative wording are included in the full document attached.		
939	13618	National Highways (Mark Norman, Spatial Planner) [939]	We support policies which outline the requirements of new developments to ensure inclusive active and environmentally sustainable forms of travel, promote road safety and manage the negative effects of road traffic on sustainable modes. We look forward to working with you to facilitate such travel where an interface with SRN occurs.	Support	Noted.
Businesses, Landowners and Developers					
88	3855	Stanfords (Miss Mollie Foley) [88]	The response supports improving health and wellbeing but objects to Policy HP1 as unjustified, overly broad, and duplicative of existing national and local policies. It argues that the policy adds no clear local test, overlaps with numerous other policies, and imposes unnecessary burdens on applicants. The requirement for Health Impact Assessments is considered unsupported by evidence, with unclear thresholds and no defined review or implementation process. Part B reads as strategic infrastructure policy rather than development management, creating confusion. The response requests deletion of HP1 in its current form.	Comment	Policy HP1 has been amended as a result of comments received during this consultation. These changes will make the Policy clearer and less repetitive. With regard to the threshold and imposition of health impact assessments, it is considered that this is clear and reflects those requirements of adjoining LPAs.
1215	3905	Pigeon [1215]	Policy HP1 is supported.	Support	Noted.
1336	4314	Pigeon [1336]	Policy HP1 is supported, but the requirement for a HIA to be submitted with developments of 50 or more dwellings should be reviewed.	Comment	With regard to the threshold and imposition of health impact assessments, it is considered that this is clear and reflects those requirements of adjoining LPAs.
136	4406	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	Refer to previous comments regarding Policy SPL3 and the same justification applies here.	Support	Noted.
1439	13873	Catesby Estates [1439]	Catesby broadly support the objectives of Draft Non-strategic Policy HP1 in promoting healthy and active lifestyles and ensuring that new development contributes positively to health and wellbeing outcomes. The Site is capable of delivering these objectives by providing safe and accessible environment, facilitating active travel, and contributing to public open space and community infrastructure where appropriate.	Comment	These comments are noted and are broadly agreed with. The Policy will be redrafted to exclude the site-specific elements, in line with the comments received from the ICB.

			However, it is noted that the policy includes detailed references to specific allocations and infrastructure projects, which are addressed separately in the Local Plan through site-specific policies such as SAMU1, SAMU2, and SAMU5. While the overall approach of encouraging Health Impact Assessments and active design principles is welcomed, Catesby consider that the inclusion of allocation-specific requirements within this policy could create duplication and reduce policy clarity. Catesby therefore consider that Draft Non-strategic Policy HP1 should focus on overarching health and wellbeing principles applicable to all development, with site-specific infrastructure and delivery obligations addressed through the relevant allocation policies. This approach would maintain the effectiveness and clarity of the policy while remaining consistent with the NPPF.		
119	14054	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	This is a very long policy, and consideration should be given simplifying it to ensure clarity for applicant and decision maker alike. (See document for proposed changes) HBF also considers it unjustified to require a health impact assessment (HIA) on all development of 50 or more dwellings. While there are clearly significant health issues to be addressed in Tendring, HBF considers that this is for the plan to address through its policies. Therefore, as currently written HBF considers this policy to be unnecessary as it adds nothing to the decision maker that is not addressed by other policies in the local plan. Instead, we would suggest that commentary in the supporting text on how the other policies in the local plan support the wider objective of improving health and wellbeing in Tendring would be more effective and prevent unnecessary duplication.	Comment	Health Impact Assessments are an important part of decision making, and other LPAs in Essex also require these. Therefore, the use of HIAs is justified.
1643	14205	Bradfield Fruit Farm (Johnny Piper) [1643]	We argue that development at and adjacent to Bradfield Fruit Farm best supports Policy HP1 (Improving Health and Wellbeing). It highlights the site's proximity to the primary school, village hall, playing fields and services, enabling walking, reduced car use, and healthier daily routines. Our representation contrasts this with the more remote Rose site, which would encourage car dependency. By supporting active travel, safer walking routes, reduced congestion, and strong social integration within the village core, the proposal is presented as directly promoting physical activity, social cohesion, and overall community wellbeing in line with HP1.	Support	Whilst these points are understood, the balance of decision-making for which sites are taken forward rests with the SHLAA and SA , as well as the input of Members, rather than at a single Development Plan Policy.
1659	14283	Colne Medical Centre (Louise Weston, Assistant Practice Manager) [1659]	Policy HP1 (Improving Health and Wellbeing) requires that development should contribute positively to the health and wellbeing of residents and not place unacceptable pressure on existing health services. This proposal would significantly increase demand on already overstretched GP services without any clear mitigation.	Comment	These representations reinforce wider concerns raised by NHS partners regarding infrastructure capacity and the importance of aligning housing growth with the timely delivery of healthcare provision. Whilst these points are noted, the NHS and ICB have made it clear that the way in which healthcare will be provided is likely to change in the coming years, focusing care away from medical settings to the community.

1647	14292	The Planning Bureau (Miss Natasha Styles, Senior Planning Associate) [1647]	Policy HP1 requires a health impact assessment from all development sites delivering 50 or more dwellings and all development in Use Class C2 (Residential Institutions). The Council should note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people's housing can bring to individuals. Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources. A report "'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that: • 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. • Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year. • On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.' In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptions such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder. Recommendation: For the plan to be in line with national policy and effective the following wording should be added to the policy to recognise the health benefits of older persons housing.	Comment	The ICB have made it clear during this consultation that these kinds of care-related uses rely on health providers as much other residential uses, and when it comes to acute care, this can often be more than those uses. It is therefore considered that an amendment to Policy or waver of HIA requirements would not be acceptable.

			"Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment"		
1718	14308	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning Ltd wish to comment on the extent to which a Health Impact Assessment is needed for schemes of 50 or more dwellings or 1,000 square metres or more, given the level of overlap with other supporting documents and processes. In our view, the requirement for a Health Impact Assessment should be subsumed into a wider consideration of design and sustainability or the threshold should be increased to developments that are more strategic in nature.	Comment	Officers consider that Health Impact Assessments are an important part of decision-making and that other LPAs in Essex also require these. Therefore, their use is justified.
1692	14345	Lewis & Scott Homes [1692]	We are pleased to see this new policy and support its overall intentions. However, we OBJECT to the absence of any recognition of the importance of providing appropriate housing for the older generation in tackling this issue. (See attached document for proposed changes)	Object	Whilst these comments are noted, it is considered that specific consideration of older peoples housing is considered within the Living Places section of the Local Plan.
1722	14393	Stanfords (Mollie Daniels) [1722]	Policy HP1 is supported in principle but unnecessary and overly burdensome as drafted. It largely duplicates national policy (NPPF/PPG) and overlaps with other Local Plan policies, adding no clear, distinct requirements while creating duplication and uncertainty. The requirement for Health Impact Assessments lacks justification, with unclear thresholds and no defined process for preparation, review, or decision-making. The policy's scope is broad and may impose disproportionate demands on applicants. Part B reads as a strategic policy rather than a development management tool. Overall, HP1 should be deleted and reliance placed on existing national policy and the wider plan framework.	Comment	Officers consider that Health Impact Assessments are an important part of decision making and that other LPAs in Essex also require these. Therefore, their use is justified.
Community Representatives					
953	3475	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1712	14244	Bernard Jenkin [1712]	Healthcare provision In North East Essex, which covers both Harwich and North Essex and Clacton constituencies, there are currently 1,994 patients per 1 Full-Time-equivalent (FTE) General Practitioner (GP). This is very close to the average number of patients FTE GP of 2,214 (as of January 2026), higher than the surrounding Integrated Care Board (ICB) areas, and far above the GPC England's Patient First Vision for General Practice of a 1 FTE GP per 1,000 patients?. There is a disparity between healthcare funding between Clacton and Harwich. With Clacton receiving specific capital projects and clearly identifies funding sources, Harwich has no new dedicated health centres and with housing expansion, will be reliant on developers adding existing facilities. There are 16,833 patients in my constituency registered at the Mayflower Medical Centre and 4,802 registered at Fronks Road Family surgery?. This is 21,635 patients that have health services of limited capacity, no urgent-care, and minimal out-of-hours service. Residents must travel out of area to Clacton or Colchester for treatment, for which they may	Comment	Whilst these comments are noted and understood, it is considered that there is little the Local Plan can do in regard to existing differences in health provision across the District. It should however be noted that new development will contribute to new healthcare provision, and detailed guidance on what will be required for the larger sites is provided within the Local Plan.

			not have means. This is due to the lack of no available public transport directly to Clacton from Harwich and people being unable to afford private taxis. With the proposed plans to expand Ramsey and parts of Harwich. Health services must also be expanded to match the demands. Harwich and Clacton face similar demographic measures, including ageing population and high healthcare demands. I am working closely with the Mayflower Medical Centre and the ICB to expand healthcare services in the area. The Council must insist that developers fund this so that health services in Harwich are bought up to the same standards in Clacton.		
262	5220	Great Bromley Parish Council (Lizzie Ridout, Clerk) [262]	There is a current absence of health services in Great Bromley; new development should provide or contribute to health and community facilities.	Comment	Whilst this representation is noted, this already happens through financial contributions to planning applications.
90	13435	Tendring Parish Council (Mrs Marie Snell, Clerk/RFO) [90]	Existing healthcare infrastructure is under significant strain. Further building surrounding Tendring impacts: • GP surgeries in the area are operating at capacity - already nothing in Tendring. • Access to routine appointments is already difficult (necessary travel to surrounding areas). • There is limited local pharmacy provision, requiring residents to travel outside the parish. • No firm commitment exists for new healthcare facilities to be delivered in parallel with development. The Parish Council is not satisfied that the Local Plan provides robust, funded, and deliverable solutions for primary healthcare or pharmaceutical provision. Without guaranteed improvements, additional housing would place unsustainable pressure on already overstretched services.	Object	Whilst these comments around pressure on healthcare are noted, it is the case that all new development will contribute financially to mitigate the harm caused by development. This being said, the Local Plan only has limited powers to influence health providers, and it is for them to put in place mitigation for pressures not caused by future growth.
258	13599	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support the rewriting of this policy as health and wellbeing are important not only to residents but to the Town Councils aspirations.	Support	Noted.
258	14165	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support the rewriting of this policy as health and wellbeing are important not only to residents but to the Town Councils aspirations.	Support	Response as above for rep 13599.
Members of the Public					
976	3584	Ms Marianna White [976]	Building 300 homes in Brightlingsea is nonsensical and at odds of benefiting health and wellbeing of residents. Brightlingsea is stretched as it is with only one Dr and one pharmacist and no sports facilities. Aside from this the	Object	Officers have provisionally suggested that development in Brightlingsea (SAH4) be removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, it is suggested that two smaller sites are included within the urban area of

			queues to get in and out of Brightlingsea with one road and at least 300 extra cars will be incredibly stressful and detrimental to health and wellbeing.		Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment.
978	3590	Mr Jason Sainty [978]	Brightlingsea is very poorly served by TDC for facilities to improve Health and Wellbeing. TDC have removed funding from the Lido and also from the Sports Centre which previously provided gym and racket sports facilities, plus use of the multi weather pitch. All these facilities remain at the Colne School, but residents can't use them. To access any of TDCs current facilities requires a car journey to Clacton, Dovercourt or Walton. All of which do have very attractive facilities. TDCs lack of funding for any facilities in Brightlingsea means they are failing the people of Brightlingsea.	Comment	Officers have provisionally suggested that development in Brightlingsea (SAH4) be removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site, it is suggested that two smaller sites are included within the urban area of Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea. This change would likely decrease pressures on infrastructure locally and hopefully ease some concerns regarding local character and the environment.
969	3671	Mr Scott Gilmour [969]	Part A: Tendring is an especially important District to prioritise improving the health and wellbeing of residents; 5.1% of residents in Tendring report having bad health, while 1.5% have very bad health. This makes health some of the poorest in Essex. Essex Healthy Places Guidance will hopefully ensure new developments prioritise healthy lifestyles from the start. It's important that comprehensive active travel and transit integration occurs to help promote a healthy life throughout the week. Part B: Additional health services and infrastructure are necessary. Hopefully they are accessible to residents by active travel with secure bicycle parking and public transport.	Support	Noted.
1059	3723	Mr Matthew Sutton [1059]	Policy HP1 commits to specific healthcare facilities for Clacton, Harwich and the Garden Community but offers only a vague fallback for the Frinton, Walton and Kirby Cross area. This area has absorbed a decade of growth with no new GP surgery. The Digital First reference cannot substitute for physical provision, particularly given the area's ageing population. The Great Oakley case shows that even planned surgeries can be dropped post-permission. I object and ask the Council to include a specific, named healthcare commitment for this area with a funding mechanism, delivery timescale and monitoring indicator.	Object	The Council, and by default the Local Plan, has limited power over what healthcare facilities are provided on the ground. The NHS and ICB make these decisions through their own internal Plans. It is the case that the NHS will become a more digital focused operation and provide care in the community rather than at hospitals.
1106	3939	Mr Jack Martin [1106]	This policy places heavy reliance on large-scale development to deliver health benefits, yet provides no firm guarantees that infrastructure will be delivered ahead of population growth. Requiring Health Impact Assessments and contributions does not ensure timely provision of GP access or hospital capacity, risking further strain on already stretched services. Concentrating growth in major settlements may also reduce accessibility for existing rural communities. The plan appears overly	Object	The Council, and by default the Local Plan, has limited power over what healthcare facilities are provided on the ground. The NHS and ICB make these decisions through their own internal Plans. It is the case that the NHS will become a more digital focused operation and provide care in the community, rather than at hospitals.

			optimistic about developer-led solutions and lacks clear safeguards to ensure healthcare, transport, and community facilities are in place before new homes are occupied.		
1059	3982	Mr Matthew Sutton [1059]	Policy HP1 Part B makes no specific commitment to healthcare for Frinton-on-Sea, Walton or Kirby Cross, despite a decade of growth and no new GP surgery. The Council's own ISA rates health effects as "uncertain" with no GP baseline data for this area. A member of my household recently attended Walton Medical Centre only to be redirected to Clacton Hospital without notice, then waited two hours without being seen. With Tendring's highest median age and lowest life expectancy in Essex, this is not uncertainty - it is a system already failing residents.	Object	The Council, and by default the Local Plan, has limited power over what healthcare facilities are provided on the ground. The NHS and ICB make these decisions through their own internal Plans. It is the case that the NHS will become a more digital focused operation and provide care in the community, rather than at hospitals.
1352	4028	Mrs Paula Bland [1352]	Health centres etc must be in place before properties are occupied. TDC (or its successor) must ensure that the developers DO contribute what they are required to; no wriggle room to get out of what the local plan is aiming to deliver. No huge rents for land e.g. on which medical centres are built but the handing over of the freehold interest in that land to the NHS to run the medical centres. No fulfilment of requirement to provide facilities should mean that the developers are prevented from carrying on with their building. No excuses accepted including developers pleading poverty.	Comment	The Council, and by default the Local Plan, has limited power over what healthcare facilities are provided on the ground. The NHS and ICB make these decisions through their own internal Plans. It is the case that the NHS will become a more digital focused operation and provide care in the community, rather than at hospitals.
581	4093	Mrs Sally Webb [581]	Much of the new housing proposals are outside of the coastal fringe. The coastal fringe has always had far better facilities than the outlying areas of Tendring - so there will need much to be done to upgrade what we have already prior to any new developments	Comment	The Council and by default the Local Plan has limited power over what healthcare facilities are provided on the grounds. The NHS and ICB make these decisions through their own internal Plans. It is the case that the NHS will become a more digital focused operation and provide care in the community, rather than at hospitals.
1495	14181	Martine Ward [1495]	Air quality has deteriorated noticeably across several parts of Tendring, and this decline is directly linked to the overlapping pressures the district is now facing. Continuous housing development, construction traffic, gravel extraction, and national infrastructure works have all contributed to rising levels of particulate matter and diesel emissions. These impacts are already affecting residents, particularly children, older people, and those with existing respiratory conditions. The cumulative effect of HGV movements, construction machinery, increased traffic on the A133, and the intensification of commercial activity has created a situation where air quality is worsening faster than local mitigation can address. Rural areas that once benefited from clean air are now experiencing pollution levels more commonly associated with urban environments. The Neighbourhood Plan must recognise air quality as a central health issue. Policies must ensure that future development does not further degrade environmental conditions and that monitoring, mitigation, and enforcement are strengthened.	Comment	ISA Objective 11 identifies a need for the Plan to ‘maintain and where possible improve air quality.’ The ISA Report highlights uncertain impacts regarding air quality in the absence of any specific evidence that can be associated directly to the proposals of the Local Plan and at the strategic level. This is considered more relevant to the development management process.

Policy HP1: Improving Health and Wellbeing

Summary of Representations

Representations for Policy HP1 have been submitted by a variety of stakeholders and are a mix of support, objections, and comments. Statutory stakeholders had several suggestions for amendments to the policy. The Essex Bridleways Association suggested reference to bridleways within the policy wording, and separately, Sport England recommended that financial contributions are collected for health-related projects. NHS partners had broader comments on the policy wording, and NHS Property Services suggested early engagement with the NHS and ICB throughout the development process. Essex County Council requested the Policy include reference to accessible routes and clear

wayfinding for older people and those with disabilities, and requested reference to the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024). Comparatively, landowners and developers objected more often to the policy, arguing that it is overly broad and duplicates both local and national policy. Further to this, some representations mentioned that Health Impact Assessments are not backed by evidence and a proper review mechanism and, therefore, are not justified. Several of these objections disagreed with the insertion of requirements to specific sites, but some used these requirements to justify sites not allocated within the Local Plan. Comments also argued that older person's housing should not have to submit a health impact assessment, as they rely less on the NHS than other forms of housing. Concerns were also raised around the difference in provision across the District, and specific concerns were mentioned about the impacts to health due to the Brightlingsea allocation. Tendring Parish Council also highlighted a lack of health facilities in their area and argued the Plan require new developments to contribute to facilities and services.

In response to the representations submitted, Policy HP1 has been amended to take into account the suggested policy wording recommended by NHS partners. The Council will continue to engage with health partners early in the development process. HP1 has also been updated with consideration for ECC's requests, and the policy wording now references accessible routes and clear wayfinding as well as the EADDAT. In response to developers' and the ICB's concerns about the insertion of requirements to specific sites, officers have removed parts of the Policy which duplicate site-specific policies. With regard to differences in HP1's provision across the District, no changes have been made, as there is little which can be done within the remit of the Local Plan. However, in response to concerns raised around the Brightlingsea site from a variety of stakeholders, SAH4 has been deleted as an allocation.

Policy HP1a: Managing the Location of Hot Food Takeaways

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
349	4295	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Public Health recommend that the preceding text for managing Hot Food Takeaways include: • Links to national and local strategies, in particular the Tendring Health and Wellbeing Strategy and the Essex Healthy Weight Strategy (2024 – 2034) Next Steps/Suggested additional wording: 4.6 Research shows that frequent consumption of food prepared outside the home is associated with a range of poorer health outcomes. Meals from hot food takeaways often contain higher levels of salt, saturated fat, and calories than meals prepared in domestic settings, which can contribute to long term health conditions such as cardiovascular disease and type 2 diabetes. The location and density of takeaways near places frequented by young people, including schools, youth facilities and transport hubs, can influence dietary behaviours. National guidance recognises the important role that the local environment plays in shaping dietary habits, particularly for children and young people. 4.7 In Essex, there are on average 69.5 fast food outlets per 100,000 people, with notable variations across districts. Tendring has the highest density, at 96.3 per 100,000, while Rochford has the lowest, at 25.7 per 100,000. A high concentration of hot food takeaways in certain neighbourhoods can influence eating patterns, particularly in areas that children and young people regularly pass through or spend time in. 4.8 To support healthier neighbourhoods and limit the concentration of hot food takeaways in sensitive locations, Policy HP1a seeks to reduce the clustering of hot food takeaways near places where children and young people congregate. It also requires proposals in other areas to demonstrate, through proportionate assessment, that they will not give rise to adverse health, environmental, or community impacts. 4.9 Supporting access to healthy, fresh and locally produced food is essential in creating health-promoting town centres and communities. Policy HP1a aligns with the aims of the Essex Healthy Weight Strategy (2024 – 2034) and the Tendring Health and Wellbeing Strategy,	Comment	Whilst these comments are noted, much of this is addressed in Policy HP1 and HP1a. This being said, references to the Tendring Health and Wellbeing Strategy and the Essex Healthy Weight Strategy (2024 – 2034) have been added to Policy HP1a.

			which collectively aim to improve health and wellbeing, reduce obesity (particularly childhood obesity), and tackle health inequalities. This approach is also consistent with national planning and public health frameworks, including the Government's National Obesity Strategy, which highlights the contribution of out-of-home eating to excess calorie consumption.		
1650	6884	East Suffolk Council (Ian Johns) [1650]	We note that the requirement for take-away premises to prove they do not cause adverse health effects under HP1a is unclear; more detail is needed on what the assessment must contain and how harm can be demonstrated. Ask for clearer guidance on the health-impact assessment required for takeaway proposals under Policy HP1a, noting that the current wording does not explain how health harm can be demonstrate	Comment	The harm to health to children and young people from hot food takeaways is detailed in the preamble to this Policy and supported by health partners.
823	13522	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Clarify that the 800m school buffer be measured along 'safe, direct walking routes' and that, where proposals are considered, crossings and footway upgrades may be required to ensure healthy, safe access.	Comment	Taking into account this representation, the Policy has been updated to the following: "800 metres: Measured as the shortest safe direct walking route along the public highway, not "as the crow flies". Where necessary crossings and footway upgrades may be required."
Businesses, Landowners and Developers					
Community Representatives					
953	3476	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
1352	4027	Mrs Paula Bland [1352]	If the Council is so keen on healthy living then all hot food takeaway facilities should be banned.	Comment	Officers consider that the detailed consideration through this Policy allows for a case-by-case assessment of applications close to hot food takeaways rather than an all out ban.
581	4094	Mrs Sally Webb [581]	I support healthier eating and reduction in 'fast' unhealthy food.	Support	Noted.
1391	4267	Mrs Laurence Dewey [1391]	This could be a positive step in the fight against the multiplication of takeaway/ fast food outlets.	Support	Noted.

Policy HP1a: Managing the Location of Hot Food Takeaways

Summary of Representations

Representations to Policy HP1a were a mix of support and other comments. The ICB recommended that the policy reference the Tendring Health and Wellbeing Strategy and the Essex Healthy Weight Strategy (2024-2034), and also recommended changes to policy wording. East Suffolk Council commented that the requirement for takeaway premises to prove they do not cause adverse health effects is unclear within Policy HP1a, and that more detail is required to clarify how this should be demonstrated. Essex County Council recommended additions to the policy wording for clarification. Two representations showed support for HP1a, whilst another representation suggests the Council should ban all hot food takeaway facilities.

In response to representations, the policy wording and supporting text has been updated to take into account comments from the ICB and Essex County Council. Reference has been given to the Tendring Health and Wellbeing Strategy and the Essex Healthy Weight Strategy (2024 – 2034). No further modifications to Policy HP1a are required.

Policy HP2: Community Facilities

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
Community Representatives					
968	3458	Campaign for Pubs (Mr Martin Bate, Pub Planning Co-ordinator) [968]	The Campaign for Pubs recommends the incision of specific criteria for public houses which should be treated as special case community facilities.	Comment	Officers do not consider that one type of community facility should be given preferential treatment over another. It is unclear what justification sits behind this request. In any event it would not be right to single out an individual facility.
Members of the Public					

Policy HP2: Community Facilities

Summary of Representations

Only one representation was submitted with regard to Policy HP2. The respondent commented there should be specific criteria for public houses, which should be treated as special case community facilities.

In response, the Council views that whilst public houses are asking for special dispensation, Officers do not consider this to be appropriate**.** No further changes are needed to Policy HP2.

Policy HP4: Cemeteries, Crematoriums and Burial Sites

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
823	13524	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	ECC welcomes the recognition that burial and crematorium developments can form part of the wider Green Infrastructure network by protecting and, where possible, enhancing landscape character, visual amenity and biodiversity. These sites also have potential to contribute to LNRS priorities and support the delivery of Objective 8.	Comment	Noted.
Businesses, Landowners and Developers					
Community Representatives					
953	3478	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4099	Mrs Sally Webb [581]	Very important with an ageing population	Support	Noted.
1376	4215	Mrs Anja Newman [1376]	Concern that aquamations, as yet unregulated in England may create other types of pollution impacts, either into the earth or the waterways.	Comment	These uses will require Environment Agency, and potentially the Council's Environmental Health team approval.
457	4252	Ms Carol Bannister [457]	Of course future expansion is required, but this policy fails to provide assurance that the Council will start taking more seriously the potential danger being presented by the large and often extended bonfires that take place so often on the field adjacent to the East facing conifers of Weeley Crematorium. I have complained constantly over the years, but so far all to no avail. Yet, the damage to these conifers is becoming increasingly evident and it is not a matter of if, but of when a wildfire will raze the memorial gardens to the ground.	Comment	This is a matter for the Council's Environmental Health rather than Planning Team.

Policy HP4: Cemeteries, Crematoriums and Burial Sites

Summary of Representations
Representations for Policy HP4 included support and various comments from a variety of stakeholders. Essex County Council supports the Policy and notes that these sites can contribute to the priorities within the LNRS, as well as Objective 8 of the Local Plan. One representation commented that the policy is very important with an ageing population, whilst another representation expressed concerns that aquamations can have pollution impacts into the earth or waterways if unregulated. Another representation argued the policy fails to provide assurance that the Council will address concerns around extended bonfires taking place on the field adjacent to the East facing conifers of Weeley Crematorium.

Having considered the representations submitted for Policy HP4, no changes are required.

Policy HP5: Open Space, Sports and Recreation Facilities

Respondent ID	Representation ID	Name/ Organisation	Supporting docs	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders						
187	3589	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]		This policy should recognise that active travel in a rural district must include horse riders alongside walkers, wheelers and cyclists. Tendring's extensive network of bridleways, restricted byways and BOATs is a legally protected asset that already supports safe, off-road movement for multiple user groups. To deliver genuinely inclusive, healthy and sustainable travel, the Council should commit to upgrading relevant PRoWs to Multi-User Routes (MURs), ensuring safe, continuous, off-road connectivity between settlements and new developments. Incorporating equestrians and PRoW Users into active travel policy is essential for safety, accessibility and rural-appropriate infrastructure planning.	Object	Officers note that CP1 of the Preferred Options Local Plan already includes reference to Public Rights of Way. The policy states that development should "ensure enhanced connectivity to existing public rights of way, including footpaths and bridleways, and where possible create new links that improve access to the wider countryside and green infrastructure network, with particular emphasis on connections to the Sunshine Coast Greenway." Further to this, alterations to PRoW are a County matter. As the Plan should be read as a whole, then no further change is required.
791	3710	Sport England (Mr Roy Warren, Planning Manager) [791]		The policy is welcomed in principle but the content of the policy has issues relating to the scope of the evidence base referenced, the relationship with Policy HP2, the scope of what development is required to contribute towards, the scope of the policy wording and the approach to sports provision in large developments. Suggestions have been made for addressing all of these issues.	Object	We are happy to mention the Council's Sport and Activity Strategy for Tendring. The Council also welcomes the change from 'playing fields' to 'outdoor playing facilities'. It is considered onerous to make site promoters provide both indoor and outdoor facilities.
349	4298	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]		Promoting and maintaining a network of connected, accessible and multifunctional green spaces, including Local Green Space, to include biodiversity enhancement and nature recovery as appropriate and planting for sensory diversity, wildlife corridors and urban foraging (eg planting of native fruit trees) encouraging tree and hedgerow planting (to support native wildlife). Open Space for Landing of Helicopter Emergency Medical Services (HEMS) HEMS provides critical care and rapid transfer to specialist hospitals for patients with severe or life threatening injuries or conditions. To support both day and night operations, a landing area equivalent to a football field is required, free from overhead and ground level obstructions (eg trees, overhead cables). Ideally this should be: • Centrally located within the development • Easily accessible by road for onward transport • Equipped with lighting, or capable of being integrated into existing open/leisure/sports space proposals. Different types of outdoor recreational land should include pet parks where dogs can be let off the lead in a controlled fenced environment. Access to nearby parks, woodlands and natural areas is widely recognised as a major contributor to social cohesion, both mental and physical health.	Comment	It is considered that such detailed issues as Helicopter provision – HEMS will be looked at in more detail at masterplan or application stage.

			High quality green spaces act as essential public health infrastructure, particularly in urban environments. Green and blue spaces provide “cultural ecosystem services”, helping restore mental clarity, reduce cognitive fatigue and support resilience in communities.		
1654	6688	Natural England (Jonathan Burt) [1654]	Advise the plan to prioritise brownfield and low-value sites, protect best and most versatile agricultural land, and safeguard Areas of Potential Importance with a 30-year management plan, ensuring high-environmental-value sites are excluded from development.	Comment	The Local Plan already does this. Many of the points here are considered under other Policies in this Plan.
1654	6694 duplicate rep 6678 email deleted	Natural England (Jonathan Burt) [1654]	Welcome Policy HP5’s protection of Areas of Potential Importance and its 30 year management requirement, but suggest the Open Space Standards be kept separate from the SANG requirement and that the wording reflect this distinction.	Comment	Whilst these comments are noted, SANGS are not mentioned in this policy. Rather, reference should be made to Chapter 7: Protected Places.
823	13525	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Comment and recommended change ECC welcomes the reference to the Essex Local Nature Recovery Strategy (LNRS), including the protection and enhancement of Areas of Particular Importance for Biodiversity (AIPBs) and the intention to safeguard Strategic Combined Opportunity Areas. These commitments are supported, as they align with the LNRS approach to strengthening ecological connectivity and delivering landscape scale nature recovery. The updated Planning Practice Guidance (PPG) suggests that in reflecting LNRS, authorities should consider the "potential to target stronger safeguarding" for areas critical to nature recovery. However, we are concerned that the wording, as drafted, may unintentionally imply that all areas identified in these maps should only be “safeguarded”, rather than recognising that development, where appropriately designed, can actively contribute to the creation, restoration and enhancement of habitats identified within the LNRS opportunity mapping. Many of the mapped Strategic Combined Opportunity Areas highlight zones where new or enhanced habitats are desirable, and well-planned development could play an important role in delivering these gains and connecting enhancement areas at scale nature recovery, planned development could play an important role in delivering these gains and connecting enhancement areas. We therefore recommend that the policy is amended to clarify that, in addition to safeguarding these areas, development should be required to contribute positively to nature recovery opportunities identified in the LNRS, including habitat creation, enhancement and ecological connectivity, where appropriate. Require new/expanded open spaces to form part of continuous active travel corridors, not isolated patches -tying GI to safe routes to schools, centres, and stations. Transport emissions - To protecting and enhancing the Essex environment and supporting healthy communities, building on the existing LTP3 and as set out in the LTP4 and ECC’s Climate Action Plan, use the Avoid–Shift–Improve framework to cut emissions from transport.	Comment	These comments are noted, however the Local Plan should be read as a whole. Whilst other Policies consider protected species and the natural environment as well as highway and transport impact, it is considered that the insertion of LNRS would strengthen the Council’s commitment to protect the natural environment.

			Suggested inclusion: "Development proposals must demonstrate how design and layout contribute to protecting and enhancing the Essex environment and supporting healthy community objectives by reducing transport emissions. This includes integrating active travel and public transport infrastructure, providing EV charging facilities, and supporting shared mobility solutions. Streets and public realm should adopt multi-functional design to combine sustainable drainage with walking and cycling routes. Travel plans must set measurable mode share targets and report on carbon savings from transport interventions."		
1710	13621	National Grid (Kevin Roeton, Senior Consents Manager (Onshore Planning)) [1710]	National Grid supports the proposed Local Green Space (LGS) allocations at Harwich Road East and the fishing lake north of Colchester Road, consistent with the adopted Ardleigh Neighbourhood Plan (October 2024). Reference is made to Proposed Policy HP5 (Open Space, Sports and Recreation Facilities), noting that while LGS receives strong protection, temporary works to underground a UKPN 33kV line at Harwich Road would not result in permanent loss. Engagement with allotment users is requested. The fishing lake LGS would be oversailed by the Norwich to Tilbury Project; while LGS would remain, fishing would cease. Given limited informal use, alternative provision, Green Belt–level protections, and "very special circumstances", the respondent questions the site's value as LGS without fishing provision.	Comment	Whilst these comments are noted, it is considered that there is not certainty in timing or delivery of the mentioned project. This therefore has the potential to create a Policy void where sites are not protected in the meantime.
Businesses, Landowners and Developers					
609	3836	Hills Building Group [609]	This policy, which seeks to encourage the provision and retention of community facilities is supported. Hills Building Group are seeking to provide a multi-use community sports building incorporating a cricket pavilion and a cricket pitch and open space including pockets of open space within the residential elements of the scheme at the Weeley Road site (draft allocation SAH7) at Great Bentley. The open space, sports and recreational facilities will benefit the existing residents in the local area and also those living within the proposed development site.	Comment	Noted.
88	3856 Duplicate email rep 14394 (deleted)	Stanfords (Miss Mollie Foley) [88]	The response supports protecting and enhancing open space, sport and recreation facilities but objects to Policy HP5 in its current form. It argues the policy is imprecise, overly broad and duplicates national policy and other Local Plan policies, creating unnecessary complexity and repetition. Requirements such as the 30 hectare threshold and minimum on-site provision are seen as unjustified and lacking a clear evidence base, resulting in uncertainty and potentially disproportionate burdens on development. The response recommends deleting HP5 as drafted and relying instead on the NPPF.	Comment	An April 2024 report to the Council's Planning Policy and Local Plan Committee identified the follow categories of development, which were consulted upon as part of the Issues & Options consultation: • Small: 1-29 homes; • Medium: 30-99 homes; • Large: 100-299 homes; • Strategic/Mixed Use – Short-term (5-10 years): 300-799 homes (like to include school/community facilities); • Strategic/Mixed-Use – Medium-term (10-20 years): 800-1,999 homes (likely to include school, community facilities and employment/commercial uses); • Strategic/Mixed-Use – Long-Term (20+ years): 2,000+ homes (likely to include schools, community facilities, employment/commercial uses and major transport infrastructure).

					The stepped site-size thresholds set out in Policy HP5 have a broad correlation and relationship to the above development categories. Sites/locations of 70 or more hectares where the public open space requirement increases to 40% community sports facilities are an expectation of this scale of development. This is wholly justified given their scale and the need to create self-sustaining and comprehensively planned development in line with the established garden community principles, which include provisions around community stewardship.
1215	3906	Pigeon [1215]	Policy HP5 is supported.	Support	Noted.
1336	4320	Pigeon [1336]	The proposed development by Pigeon at Alresford would provide open space and would be consistent with the aim of Policy HP5. Policy HP5 is supported. It is requested that the Council reviews the policy to check that the requirement for usable open space to be more than 0.3 hectares in size is reasonable and deliverable, and that the definition of land included as open space is consistent with national policy.	Support	Noted.
431	4444	Welbeck Strategic Land [431]	Any financial contribution towards open space, sports and recreation facilities, whether on or off-site, should accord with the statutory tests contained in Article 122 of The Community Infrastructure Levy Regulations 2010 and clarity is needed in the policy about amenity.	Object	Whilst the comments are noted it is considered that the policy is sufficiently flexible and clear in definition. With regards to the term 'Amenity,' Wellbeck's definition is correct.
134	13679	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The policy should not exclude boundary wedges, wildlife mitigation areas and SUDS areas from the Public Open Space requirement. POS has always been multi-functional and to enforce this policy will see the delivery of sterile, lawn areas and a dramatic reduction in homes delivered on each site.	Object	Whilst these comments are understood, Natural England establish in one of their representations that public open space and habitat creation are two distinct land uses, and it is usually the case that public access to land disturbs the species the designation is trying to protect.
1439	13875	Catesby Estates [1439]	Catesby broadly support Draft Non-Strategic Policy HP5, which seeks to maintain, expand and improve the quality and accessibility of public open space, sports, and recreational facilities. The Site would directly contribute to these objectives, as set out in the Vision Document, by delivering approximately 52.65ha of green infrastructure and multi-functional open space to serve both the existing and new community. This provision would also directly support the objectives of Draft Policy HP1 by promoting healthy and active lifestyles and enhancing wellbeing in line with the aims of the policy and the NPPF.	Comment	Noted.
119	14055	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	This policy states in the opening sentence of the third paragraph that open space that is also identified as local green space will be given extra protection and its loss will not be permitted over the life of this local plan. This is not consistent with paragraphs 103 to 108 which established that there may be circumstances where open space and local green space (LGS) maybe developed. While HBF recognise that LGS and open spaces are often highly valued by residents there may be circumstances over the course of the plan where circumstances allow for their loss. The protection afforded by national policy is considered to be sufficient and this sentence should be deleted.	Comment	Comments are noted. Having reviewed both NPPF and Policy wording, it is considered they are similar in nature. This being said, the Local Plan will be reviewed again in 5 years , and amendments can be made if needed.
Community Representatives					

953	3479	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
276	3965	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	All open space provisions that occur as part of S106 developments, whether on site provisions or financial contribution, should be agreed in collaboration with the local community. Where open space contributions are payments in lieu of on-site provisions, how such financial contributions are spent should be at the discretion of the local parish council/community.	Comment	Whilst this representation is noted, It is difficult to see how this would work in practice. The LPA is the determining authority on planning applications, and it may well be too time consuming and onerous to gather comments from Town and Parish Councils on each application that has an open space element. This may be better addressed through the production and review of a Neighbourhood Plan where such detailed issues can be considered.
1652	6722	Wrabness Parish Council (Richard Colley) [1652]	We ask that Policy HP5 be amended to safeguard the existing Station Masters Garden as public open space on the Wrabness Inset Plan.	Comment	This request is noted and is a sensible amendment. The site is publicly accessible and available for the community. This action has been agreed, but there are no changes to the Policy.
Members of the Public					
1113	3790	Mr Keith Smithard [1113]	Building on the last field in Frinton which is the last natural, open field within the gates is a huge problem for the wildlife of the town.	Comment	Whilst these comments are noted, any application to come forward as a result of the local plan allocation will be supported by a Habitat Regulation Assessment of which the Council will assess the impacts on biodiversity on site.
1148	3871	Mr David Green [1148]	Too late for Brightlingsea! Since Tendring seem to want to concentrate facilities around Clacton our sports centre was closed. The hundreds of new residents will add to traffic flow as they seek out out of town facilities. That is apart from our swimming pool which was nearly lost as well. The imbalance of funding for the smaller towns in Tendring requires change.	Comment	Sports and leisure funding is outside of the Local Plan process. Whilst these comments are noted, the Local Plan can do little to influence this. However, the revised strategy for Brightlingsea now focuses on a number of smaller-scale sites which collectively will continue to deliver growth, albeit at a reduced level and with a more distributed pattern. This approach reflects the Council's consideration of infrastructure capacity, including local highways and community services, and seeks to better align future development with the town's characteristics and constraints. This should therefore minimise the reliance on local services.
1352	4025	Mrs Paula Bland [1352]	Very important to have sports fields and playgrounds available for the community to use at affordable (not for profit) prices.	Comment	The cost of sports facilities for the public is not a planning matter.
581	4100	Mrs Sally Webb [581]	Sensible	Support	Noted.
1376	4216	Mrs Anja Newman [1376]	Ensure sports and leisure facilities remain open and affordable for all. Real shame TDC no longer has badminton/squash courts in Harwich/Manningtree.	Comment	Whilst this representation is noted, is not something the Local Plan can address.
15	14145	Mrs Karen Rose [15]	My comments relate to the classification of my garden as Safeguarded Open Space within the updated Mistley, Manningtree and Lawford map. I request that this designation be reviewed and removed, as it does not accurately reflect the status of the land. Supporting evidence, including Land Registry Titles, has been provided to clearly show the garden boundary. In addition, clarification is sought on the definition of "Safeguarded Open Space" and how it applies in this case.	Comment	The Local Plan maps have been reviewed and it is clear that the Safeguarded Open Space has been drafted in error in this instance, and this will be corrected to remove this designation from the land held on this registry title.

Policy HP5: Open Space, Sports and Recreation Facilities

Summary of Representations

Representations for Policy HP5 included a mix of support, objections, and comments. The Essex Bridleways association objected to Policy HP5, commenting that the policy should recognise horse riders alongside walkers, wheelers, and cyclists within active travel matters. Sport England made suggestions to addressing multiple issues relating to Policy HP5, as well as its relationship with Policy HP2. Thorpe-le-Soken Parish Council commented that all open space provisions that occur as part of S106 developments should be agreed upon in collaboration with the community. The ICB suggested additional wording to support open space for the landing of Helicopter Emergency Medical Services (HEMS) and suggested different types of outdoor recreational spaces. Natural England recommended the plan prioritise brownfield and low-value sites to protect the best and most versatile agricultural land and safeguard Areas of Potential Importance. Further to this, Natural England also advised Open Space Standards be kept separate from the SANG requirements. Wrabness Parish Council asked that Policy HP5 be amended to safeguard the existing Station Master Garden as public open space. ECC requested the policy is amended to clarify that development should contribute positively to nature recovery opportunities as identified in the LNRS and also recommended a requirement for new/expanded open spaces to form part of a continuous active travel corridor, rather than exist as an isolated path. ECC also suggested further changes to policy wording. National Grid made comments about the relation of the Norwich to Tilbury project to open green space. Other objections highlighted the policy's complexity and repetition, as well as the viability of open space standards. Further comments are made with regard to developments on green field sites, the loss of leisure facilities, and a particular parcel classified as Safeguarded Open Space.

In response to representations, a few changes have been made to Policy HP5. The Council has taken Sport England's request to mention the Sport and Activity strategy and has changed 'playing fields' to 'outdoor playing fields' throughout the Policy. Changes were also made to the Local Plan maps with regard to Safeguarded Open Space. Reference was also added to the LNRS. No further modifications are required.

CHAPTER 5: LIVING PLACES

Policy LP1: Housing Supply

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
1335	4366	Affinity Water Ltd [1335]	The housing target in Policy LP1 is supported because it is derived from the standard method for calculating local housing need, but upward adjustments for economic growth and affordable housing should be considered and assessed. The contribution to the housing supply from medium sized allocations, including MSA3 and MSA30, is supported.	Support	Noted.
6	13457	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	**Housing Allocations and Strategic Policy LP1: Housing Supply** When Anglian Water submitted its Business Plan to Ofwat in 2023, the regulatory framework did not anticipate the pace and scale of growth outlined by the Government through changes to the standard method for calculating local housing need, as set out in the National Planning Policy Framework and Planning Practice Guidance updates (December 2024). As a result, the level of growth funded within the PR24 Business Plan does not fully reflect the scale of growth pressures or the associated infrastructure investment required. The PR24 Business Plan for 2025–2030 (Asset Management Period 8 – AMP8) does, however, identify investment within Tendring District, including a growth scheme to increase capacity at Clacton-Holland Haven Wastewater Recycling Centre (WRC) to accommodate future development within its catchment. Despite this, the planned investment will not necessarily address the full quantum of growth proposed in the emerging Local Plan. Future infrastructure requirements will therefore be informed through subsequent iterations of Anglian Water's Drainage and Wastewater Management Plan (DWMP), which will guide investment strategies in later Asset Management Periods (AMPs). **Supporting Sustainable Growth and Regulatory Reform** Anglian Water is committed to enabling sustainable growth and is working collaboratively with stakeholders to address capacity challenges. This includes efforts to secure policy and regulatory changes that would allow water companies to better support growth—for example: • enabling earlier strategic investment to create capacity ahead of development; and • revising charging rules to facilitate developer contributions toward new infrastructure. These proposed changes align with the Government's white paper, *A New Vision for Water* (January 2026). The successful implementation of these reforms, alongside effective management of the transition to the new regulatory framework, will be critical in securing the investment required to support planned growth. Anglian Water is also working closely with Defra's Ministerial Water Delivery Taskforce, its regulators, and other key stakeholders to address growth-	Comment	The Council acknowledges the capacity challenges identified and will continue to work proactively with Anglian Water, the Environment Agency and other relevant partners through the ongoing preparation of the Local Plan. This will ensure that infrastructure requirements, constraints and delivery phasing are fully reflected and addressed through the Water Cycle Study and Infrastructure Delivery Plan and are appropriately incorporated into housing allocations and other relevant policies within the Local Plan. In response to concerns raised by Anglian Water regarding limited sewage capacity, particularly in areas such as Little Bromley, Little Bentley and Tendring Heath, the Committee's decision reflects its view that these sites could still make a valuable contribution to housing supply, support the rural economy and help sustain local services in rural areas. The Council is of the opinion that the objection from Anglian Water can be overcome through the provision of private sewerage facilities.

			related challenges across the region. This includes ongoing engagement regarding the delivery of the Tendring Colchester Borders Garden Community and capacity at Colchester WRC. **Future Planning and Investment Strategies** Anglian Water is currently preparing updated versions of its: • Drainage and Wastewater Management Plan (DWMP28), and • Water Resources Management Plan (WRMP29), covering the 25-year period from 2030 to 2055—extending beyond the Local Plan period. As part of this process, Anglian Water will continue to engage with local planning authorities to refine growth scenarios and ensure alignment between infrastructure planning and development proposals. The DWMP will inform investment decisions for the next Business Plan (Price Review 2029 – PR29), covering Asset Management Period 9 (AMP9: 2030–2035). It will set out how drainage and sewerage systems will be managed and developed to meet statutory obligations under the Water Industry Act 1991. This work will address key challenges including: • infrastructure condition and asset health; • climate change; and • population growth. A risk-based approach will be applied across short-term (5-year), medium-term (15-year), and long-term (25+ year) horizons to identify "best value" investment solutions. **Role of the Water Cycle Study (WCS)** Anglian Water recognises the importance of the Tendring Water Cycle Study (WCS) in informing development phasing. In particular, the WCS should guide site delivery trajectories where there is currently insufficient dry weather flow capacity at wastewater recycling centres to accommodate new development. Anglian Water has provided data to support the preparation of the WCS and will continue to work closely with the Council to advise on infrastructure capacity and the timing of future investment at relevant WRCs.		
823	13559	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	**Delivering Places** This section identifies a number of major mixed-use strategic allocations, including Garden Villages, the Garden Community, urban extensions and regeneration sites. All of these are heavily dependent on the timely and coordinated delivery of transport, digital, and green/blue infrastructure. Full alignment with ECC's vision-led transport approach—building on the existing Local Transport Plan (LTP3) and as set out in the emerging Essex LTP4 (*"A Better-Connected Essex"*)—is therefore essential to ensure that this scale of growth: • Minimises the need to travel; • Achieves modal shift before reliance on car-based infrastructure; • Reduces carbon emissions; • Prioritises healthy, safe and inclusive access; and • Ensures that cumulative impacts are not severe (in accordance with NPPF paragraph 116).	Comment	The Council is continuing to work closely with Essex County Council and National Highways on all matters relating to transport modelling and will update the evidence base and policy wording at Regulation 19 stage to ensure impacts are appropriately mitigated and not severe. Where justified and supported by the evidence base, the Council has updated Chapter 5 (Living Places) and Chapter 9 (Delivering Places), including the Strategic Mixed Use Allocations referenced in ECC's comments. In addition, and where supported by the evidence and viability work, the Council has taken on board ECC's suggestions in relation to the Essex Local Nature Recovery Strategy (LNRS), Green Infrastructure and Biodiversity Net Gain, as well as recommendations to strengthen connectivity through public transport and sustainable transport improvements.

			To achieve this, ECC recommends strengthening Section 9 so that the delivery of development is clearly contingent on sustainable transport, effective demand management, and appropriate infrastructure phasing **Expectations for Regulation 19** ECC advises that the Regulation 19 Local Plan should include: • Updated transport evidence reflecting final site allocations and committed infrastructure; • Detailed junction-level modelling, including sensitivity testing and safety audits; • Clear demonstration that cumulative transport impacts are not severe, as required by NPPF 2024 (paragraph 116); and • Integration with the Infrastructure Delivery Plan (IDP) to confirm the deliverability and viability of transport infrastructure packages. ECC will continue to work with Tendring District Council (TDC) to ensure that these requirements are reflected in the Regulation 19 Plan and will assist with the preparation of the IDP. **Further Transport and Infrastructure Recommendations** ECC also recommends that the Plan includes: • Mode share targets for each strategic allocation; • Delivery of, and connections to, LCWIP and ATNP active travel corridors; • Developer contributions towards sustainable transport measures, including active travel, LCWIP, BSIP, passenger transport, rapid transit, bus priority, mobility hubs, demand-responsive transport, and park-and-ride facilities where justified; • Robust and monitored Travel Plans with clear remedial actions; • Freight and servicing strategies for major urban or employment-intensive sites; and • A monitoring and enforcement framework covering mode share, junction performance, bus reliability and active travel usage. These measures would ensure consistent and enforceable delivery of transport infrastructure. ECC will work with TDC to incorporate these requirements into the Regulation 19 Plan and IDP. **Strengthening Strategic Allocations** Section 9 identifies several key strategic sites, including: • Hare Green Garden Village • Horsley Cross Garden Village • Weeley Garden Village • Rouses Farm • Oakwood Park • Hartley Gardens • Deane's Lane/Oakley Road • Saltings Quarter • Tendring–Colchester Borders Garden Community **LCWIP / ATNP Safeguarding and Delivery**		

			ECC advises that all strategic sites should: • Safeguard LCWIP corridors; • Deliver walking, wheeling and cycling routes compliant with LTN 1/20 standards; and • Provide new links, crossings and junction improvements. **Rapid Transit (RTS) and Bus Priority (BSIP / Enhanced Partnership)** Policies should require that: • Rapid Transit and bus priority infrastructure is designed and delivered at early phases of development; • Major sites provide high-quality bus priority measures, rapid transit stops, waiting environments, and clear pedestrian access; • Park-and-Choose facilities are considered for larger strategic sites as part of an integrated sustainable transport solution; and • All bus infrastructure aligns with BSIP and Enhanced Partnership standards. **Mobility Hubs** Mobility hubs should be required at: • All Garden Villages; • The Tendring–Colchester Borders Garden Community; • Harwich/Dovercourt, Clacton and Manningtree; and • Rail stations and major centres. Given the limited reference to mobility hubs in the current Local Plan, ECC recommends strengthening policy wording by referencing the Essex Design Guide and the Mobility Hubs Implementation Guide (September 2024), to support integrated travel and developer contributions. **Freight and Logistics** ECC recommends introducing a dedicated freight policy, building on LTP3 and reflecting emerging LTP4 priorities, including: • Freight and servicing emission reduction plans; • Promotion of zero-emission freight consolidation centres (particularly in Harwich and along the A120 corridor); • Support for last-mile logistics using e-cargo bikes and zero-emission vans; and • Strategic routing to minimise HGV impacts on communities and environmentally sensitive areas. This approach would ensure that employment growth contributes positively to environmental protection and healthier communities. **Digital Mobility (CP3 Integration)** Strategic allocations should also be required to support: • Mobility as a Service (MaaS) platforms; • Real-time travel and traffic data systems; • Digital booking systems for bus and demand-responsive transport; and • Smart traffic systems aligned with ECC's digital mobility strategy.		

			This will enable seamless multimodal journeys and help reduce dependency on private cars. **Rail-Linked Development** For allocations located near rail stations (e.g. Weeley, Great Bentley, Kirby Cross, Thorpe-le-Soken, Alresford and Manningtree), policies should require: • A clear rail-focused access strategy; • Improved walking and cycling links to stations; • Secure cycle parking; and • Enhanced bus–rail interchange facilities. This will maximise sustainable travel opportunities and reduce local traffic impacts. **Green Infrastructure and Biodiversity Net Gain** **Relevant Policies:** SAMU2 (Pages 182–183) SAMU3 (Pages 187–188) SAMU4 (Pages 190–192) SAMU5 (Pages 194–195) SAMU6 (Pages 198–200) SAMU7 (Pages 202–204) ECC welcomes the inclusion of green infrastructure (GI) requirements within these policies, particularly: • The clear requirement for 20% Biodiversity Net Gain (BNG); • Provision of strategic open space; and • Integration of priorities from the Essex Local Nature Recovery Strategy (LNRS) into masterplanning. Support is also expressed for the Hartley Gardens SPD and its masterplanning principles. **Recommended Improvements** To ensure consistency across all strategic allocations, ECC recommends that: • Policies SAMU1 and SAMU3–SAMU4 explicitly require BNG delivery in accordance with Policy PPL4a; • All relevant policies reference the Essex LNRS; and • Policies adopt a landscape-led approach that considers: ○ visual and landscape impact; ○ ecological enhancement opportunities; ○ urban greening; and ○ the delivery of a multifunctional and connected green infrastructure network. This will ensure alignment with LNRS priorities and provide a coherent, district-wide approach to nature recovery and green infrastructure delivery.		
148	14466	Environment Agency (Environment Agency) [148]	Draft Local Plan housing allocations (Table LP1) should be screened using an updated Level 1 Strategic Flood Risk Assessment (SFRA) to enable the LPA to apply the Sequential Test and direct development to the lowest risk areas. Where flood risk affects a proposed allocation and no lower-risk alternatives	Comment	The Council will update the Strategic Flood Risk Assessment and ensure the sequential and exception tests are applied, with appropriate mitigation secured in line with national policy.

			exist, a Level 2 SFRA should be undertaken to provide detailed, site-specific analysis. This will inform planning decisions, identify mitigation to make development safe without increasing risk elsewhere, and support application of the Exception Test where required.		
Businesses, Landowners and Developers					
1215	3907	Pigeon [1215]	The housing target in Policy LP1 is supported because it is derived from the standard method for calculating local housing need, as a minimum. However, the Council's approach should be amended to include additional growth on the existing urban edge of Clacton (at Sladbury's Lane) which is identified as a Strategic Urban Settlement (SUS) in the settlement hierarchy. The Council should consider an uplift in housing need to deliver additional affordable housing, having regard to the Local Plan Viability Assessment and the advice contained in Planning Practice Guidance.	Comment	The comments are noted. The reasons for excluding the Sladbury's Lane site are set out in the relevant evidence base documentation here - Tendring SHLAA December 2025 An uplift in housing need has already been established through the Government's standard methodology, resulting in a significantly higher overall housing requirement for the District. While viability testing demonstrates that a 20% affordable housing contribution is appropriate and deliverable across most sites (with the exception of the larger Garden Village broad locations, where a 30% requirement is applied), the overall number of affordable homes delivered over the Plan period is expected to exceed that provided for under the current Local Plan, where a blanket 30% requirement applies.
1221	3927	The M. E. Lungley Will Trust & Others [1221]	The respondent's site (land on the south easte corner of Ramsey Road and Mayes Lane) when viewed in the context of the settlement boundary, represents a logical rounding off of the settlement and can accommodate up to 60 dwellings. The land shares a boundary on three sides with the settlement boundary and is accessible to local services, with bus services adjacent to the site. The site would suit a medium sized local developer using local trades that would be likely to deliver the development in the first 5 years of the Plan. The site and scale of development make it compatible with similar Medium Site Allocations contained within the Regulation 18 Plan.	Comment	The site referred to in the respondent's submission has not been promoted through either of the Council's Call for Sites exercises but has been assessed as an alternative and discounted site around urban settlements. While the submission and the supporting arguments in favour of allocating the site are noted, the Council does not consider the site to be suitable for allocation at this time or stage of the local plan process. The site in question is characterised by a strong sylvan setting, with a dense canopy of mature trees that contribute significantly to its wooded appearance and local landscape character on the edge of the Harwich, Dovercourt and Parkeston settlement. Although the site is located directly adjacent to the settlement development boundary for Harwich, Dovercourt and Parkeston, its development would result in the loss and erosion of these important sylvan qualities within the site and therefore erode the character of the site and the immediate surrounding area. Furthermore, St Michael's Grade 1 listed church is located to the north west. A planning application for development on land west of Mayes Lane was dismissed on appeal over concerns about this impact. Due to the appeal decision at Mayes Lane, this land is not proposed for inclusion within the Settlement Development Boundary. On this basis, and taking account of landscape, character, and heritage considerations, the Council does not consider that the site represents an appropriate or sustainable option for allocation within the Plan.

1002	3960	George Thompson Limited [1002]	The proposed housing supply in Strategic Policy LP1 of the Local Plan Preferred Options document should be increased by another 1,063 dwellings, from 19,517 to 20,580 dwellings, to allow for: (i) the likelihood of Local Plan adoption in 2028; (ii) a minimum 15-year period following adoption, from 2028 to 2043; and, (iii) the retention of a circa 8% supply buffer, over the increased minimum local housing need figure of 19,134 dwellings (i.e. 18,071 + 1,063).	Comment	The Council has already taken account of a likely adoption date of 2028 and has structured the Plan period to extend to 2043, thereby ensuring a minimum 15-year period post-adoption in line with national policy. The housing requirement and supply approach incorporates an appropriate buffer, including the circa 8% flexibility referenced. The Council does not consider that a further uplift of 1,063 dwellings is justified at this stage. The Plan already provides a significant and proportionate level of growth, supported by a wide range of deliverable and developable sites. This includes a deliberate emphasis on small and medium-sized allocations, alongside a more flexible policy framework for windfall delivery through self/custom build and rural exception schemes, all of which are intended to enhance resilience and responsiveness in supply. Importantly, the housing trajectory, delivery assumptions and overall requirement will continue to be tested and refined as the evidence base is updated through the plan-making process. The Council will keep the position under active review to ensure that the Plan remains positively prepared, justified and effective, with a housing supply that is both realistic and deliverable, without introducing unnecessary or unjustified uplift at this stage.
705	4185	Mr Peter Le Grys [705]	A detailed objection is submitted against what appear to be policy LP1 (in chapter 5 of the Plan). The objector is promoting a site that was not included in the Regulation 18 Local Plan spatial strategy and instead is relying on Elmstead Neighbourhood Plan policies to support its inclusion.	Object	The Council notes that the site is not included within the spatial strategy or proposed allocations set out in the Regulation 18 Plan. Reliance on Elmstead Neighbourhood Plan policies alone is not sufficient to justify its inclusion in the emerging Local Plan. Sites in and around Elmstead Market were not taken forward due to the significant level of growth already planned and committed in the area, including strategic development within the Tendring Colchester Borders Garden Community. These developments are expected to make a substantial contribution to housing delivery through to 2043, and it is not considered that the local housing market or existing infrastructure could sustainably accommodate additional growth beyond this. Site selection has been undertaken through a robust and consistent assessment process to ensure alignment with the Plan's spatial strategy, infrastructure capacity, and sustainability objectives. On this basis, no change to the proposed allocations is considered justified at this stage. The Council will, however, continue to keep this position under review as the evidence base evolves.
705	4195	Mr Peter Le Grys [705]	Object to failure to include site rear of The Woodpeckers as shown on attached plan. This site is not only sustainable in terms of location but also will have limited impact upon the immediate locality.	Object	The site known as 'Woodpeckers' was submitted through the Call for Sites process and has been subject to assessment. It has not been taken forward as a housing allocation as it is considered unsuitable. The site lies to the rear of existing development, in a backland position behind a dwelling known as Malmore, on the western side of Clacton Road, Weeley Heath. It falls partially outside the defined settlement boundary, and its development would result in an intrusive and uncharacteristic extension into open countryside, causing harm to the rural character and landscape.

					While access may be achievable from Clacton Road, the site's isolated, backland nature and the potential for increased traffic further reinforce concerns regarding the suitability of development in this location. Having regard to these constraints, the site does not align with the Plan's spatial strategy or sustainability objectives, and its exclusion from the list of proposed allocations is therefore justified.
705	4196	Mr Peter Le Grys [705]	Failure to include site subject of previous representation. See attached plan. Also see application 25/0665/OUT which was refused solely on absence of an ecology report.	Object	The approval referenced by the objector relates to a proposal for two self-build dwellings. In contrast, the submission under the Call for Sites process seeks allocation for a significantly larger scheme of up to 22 dwellings (noting the Councils assessment of the call for sites submission references up to 10 dwellings), nevertheless this represents a materially different form and scale of development. At the time of the Council's site assessment, it was concluded that an allocation of this scale—particularly as originally promoted by the agent—would be inappropriate. The site lies just outside the Settlement Development Boundary (SDB) and is characterised as backland, where development would extend beyond the established predominantly linear pattern of housing along the northern side of Holland Road. As such, it would introduce a new layer of development that is not reflective of the prevailing settlement form or spatial character. Furthermore, proposals for self-build dwellings are assessed against a distinct suite of planning policies, including those specifically tailored to support small-scale, custom or self-build development. These considerations are not directly comparable to the assessment of a larger housing allocation for market dwellings. The current proposal, by virtue of its scale, nature, and intended delivery as a market housing scheme, raises fundamentally different planning considerations than those applicable to a two-dwelling self-build application on the same or a similar site.
1336	4325	Pigeon [1336]	The housing target in Policy LP1 is supported because it is derived from the standard method for calculating local housing need, but upward adjustments for economic growth and affordable housing should be considered and assessed. The contribution to the housing supply from strategic allocations, including SAH6, is supported.	Support	The point raised in respect of considering potential upward adjustments for economic growth and affordable housing needs is recognised. In response, the Council will continue to keep its housing requirement and supply assumptions under review as further technical evidence becomes available. This will include consideration of whether adjustments are necessary to ensure that the Plan appropriately responds to projected economic growth and identified affordable housing needs. Any refinements to delivery rates, site capacities, or trajectories will be evidence-led and will seek to ensure alignment with the overall spatial strategy and the Plan's objective of maintaining a robust and deliverable housing supply.
1422	4422	M Scott Properties Ltd (Scott Properties) [1422]	Agree with the residual requirement for 7,400 new homes. Consider more flexibility (homes) above the Standard Method would ensure the plan is effective in accordance with paragraph 69 of the NPPF 2024. Horsley Cross Garden Village (SAMU9) given it's strategically important	Comment	Noted.

			location along the A120 transport corridor could support the delivery of further new homes and employment development and improve infrastructure including public transport. Directing further growth land to the south at Land west of Clacton Road, Horsley Cross (Site ID:2216) is ideally placed and represents a sustainable pattern of development in accordance with paragraph 8 of the NPPF 2024.		
1638	4425	Lichfields (Amy Jones, Planner) [1638]	Our client supports this approach and the Council's identification of appropriate supply sources and of allocation sites as set out in Table LP1. The Council should ensure that the sustainable allocation sites are optimised for the delivery of housing to meet housing need.	Support	Noted.
431	4445	Welbeck Strategic Land [431]	Delete the Garden Village allocations at Hare Green, Horsley Cross and Weeley Green for the reasons identified in the objections to Strategic Policies SP1, SAMU6, SMAU8 and SAMU1.	Object	The Council acknowledges concerns regarding reliance on strategic sites; however, given the scale of housing required, the inclusion of Garden Villages is considered necessary, subject to further evidence on deliverability and infrastructure.
431	4450	Welbeck Strategic Land [431]	Additional housing allocations are needed including at Grange Road, Lawford and Heckford's Road, Great Bentley.	Object	The sites referenced have previously been considered and discounted through the Council's Call for Sites assessments, for the reasons set out in the published evidence base. On this basis, the Council does not consider that further site allocations are required at this time. Officers are, however, continuing to review the assumed delivery rates and trajectories within the Local Plan evidence base to ensure they remain realistic, robust, and capable of supporting the Plan's overall housing strategy. The Plan already proposes a substantial number of allocations across a range of small and medium-sized sites, alongside a more permissive approach to self-build/custom housebuilding and rural exception schemes. This is intended to provide flexibility in delivery and to support a resilient housing land supply. In doing so, the Council is seeking to ensure that the Plan can demonstrate and maintain a deliverable five-year housing land supply, including the appropriate buffer as required by national policy in the NPPF, with the scale of any buffer applied in accordance with prevailing national guidance at the time of assessment.
516	7618	Stanfords (Mrs Beth Deacon-Bates, Head of Planning) [516]	We support allocating land adjacent to 26 Harwich Road, north of Foxash Estate, for around 30 dwellings and recognising Foxash Estate as a Smaller Rural Settlement with its own boundary, arguing that this is a sustainable, deliverable and proportionate growth opportunity that will improve the plan's spatial strategy.	Support	Noted.
828	13635	Welbeck Strategic Land IV LLP [828]	We object to the Council's proposed housing supply as set out in Policy LP1 and Table LP1 (Local Plan Housing Allocations). As outlined below, the Plan is overly reliant on new settlements and large strategic sites to meet its housing needs—particularly in the early part of the plan period. This reliance is not justified and risks undermining the deliverability of the Local Plan from the point of adoption.	Object	The Council acknowledges concerns regarding reliance on strategic sites; however, given the scale of housing required, the inclusion of Garden Villages is considered necessary, subject to further evidence on deliverability and infrastructure. As set out elsewhere in the Council's' responses to similar points above, Officers are continuing to review the assumed delivery rates and trajectories within the Local Plan evidence base to ensure they remain realistic, robust, and capable of supporting the Plan's overall housing strategy.

726	13656	A H Brown Farms [726]	In relation to a site located to the east of Rush Green Road and submitted against policy LP1 – the submission states that the site area extends to approximately 12 hectares and could deliver up to 250-300 dwellings based on 20-25 dwellings per hectare. The submission argues that the site is an appropriate scale for development in Clacton, in keeping with the character of the local area. In terms of housing need, figure 5.2 in the Tendring SHMA (March 2025) which forms the evidence base for the emerging plan, shows the profile of new accommodation required in Tendring. 78.1% of housings should be market housing, with 14.5% affordable or social rent, 4.1% shared ownership and 3.2% first homes. The land east of Rush Green Road has the capacity to bring forward development that would meet the housing mix and provide accommodation that is required in Tendring, including affordable housing and First Homes Furthermore, the Essex Supported and Specialist Accommodation Needs Assessment (August 2025) identifies an estimated requirement for an additional 2,400 wheelchair accessible homes (M4(3) standard) in Essex by 2044. This Site can provide accessible and adaptable homes that meet M4(3) and M4(2) standards, to meet this target. The landowner has confirmed that the scale and layout of development is flexible and discussions with the Council would be welcomed. As part of the Call for Sites consultation, the Site was assessed as unsuitable for development, which appears to be mainly predicated on the location of the site within the Strategic Green Gap. However, it notes that there is potential for development of the right scale to be considered favourably. Any development would need to consider the Strategic green Gap. Notwithstanding our view that the Strategic Green Gap policy should be deleted, the Strategic Green Gap in itself does not make the site unsuitable for residential development. The site can accommodate a suitable buffer to the east and the south of the site as appropriate to ensure the green gap is maintained. The Site is considered suitable for residential development having regard to its location adjacent to the settlement boundary and existing residential dwellings. The site is within walking distance (800 metres) to a range of local amenities and services, including schools, shops, restaurants and recreation grounds. The site is within walking and cycling distance to the train station and bus stops. The Site is accessible from Rush Green Road, allowing the site to integrate effectively within the existing settlement. There is no evidence to suggest that access could not be achieved in a safe and policy-compliant manner, and any detailed highway considerations can be resolved through the normal development management process.	Comment	A smaller site of approximately 2.31 hectares, located to the east of Rush Green Road, was submitted through the Call for Sites process. However, this site – which is significantly smaller than the site subject to this representation – was discounted at an early stage of the Council's assessment due to it being located in the Strategic Green Gap between the settlements of Clacton-on-Sea and Jaywick. This approach is consistent with the Council's *Call for Sites Analysis Strategy*, which makes clear that the Council intends to retain, and where appropriate strengthen, Strategic Green Gaps in key locations. These designations play a critical role in preserving the separate identity of settlements and preventing coalescence. The site lies within the established Strategic Green Gap between Clacton-on-Sea and Jaywick, including land to the south of Rush Green Road. This area is identified as particularly important to maintaining settlement separation and safeguarding sensitive landscapes including key open countryside uses, and will continue to form a fundamental component of the Local Plan strategy over the extended plan period to 2043. In light of this clear and established strategic objective, all sites located within designated Strategic Green Gaps – including this site – are excluded at the initial sift stage of the assessment process. This ensures consistency and alignment with the overarching spatial strategy. While the submission in support of developing the site has been duly noted, the arguments advanced do not outweigh the strong and comprehensive policy basis for retaining, and potentially extending, Strategic Green Gap designations, and therefore discounting this site as part of an early sift. Accordingly, there is no justification to depart from the Council's established strategy in this instance.

			The physical characteristics of the site, including its scale, form and relationship with the existing settlement, further support its suitability. The site is well-related and well connected to the built up area of Clacton. It provides an opportunity for sustainable growth that would reinforce the town and maintain existing services and facilities. With an appropriate design response, and careful consideration of the Strategic Green Gap, the site is capable of delivering high-quality residential development that respects the established character of Clacton, while making efficient use of land in a highly sustainable location. As part of the Call for Sites consultation, the Site was assessed as available for development. The site remains available for development. There are no known legal, ownership, tenancy or ransom constraints that would restrict delivery. The site is not subject to restrictive covenants or third-party interests that would delay or prevent development. Accordingly, the site meets the availability requirements of national planning policy and the Council's Development would be viable and deliverable, with no abnormal infrastructure requirements anticipated. Access can be provided using existing local infrastructure, and utilities are available in the vicinity, consistent with its location adjacent to the established settlement. Development could be brought forward in a timely manner following allocation and the grant of planning permission.		
1713	13668	City & Country [1713]	Consideration should be given to increasing the overall housing requirement set out within LP1, to respond to the economic and population trends within the District. It is imperative that the spatial strategy and housing allocations are reviewed to significantly increase the quantum of growth delivered in small to medium sized sites (10-300 dwellings). The proposed strategy which seeks to rely on garden villages and large strategic sites is likely to result in a significant under delivery of housing and it is critical that smaller sites which do not have major infrastructure requirements are allocated to boost housing supply and provide choice and competition for market land. It is noted that the Strategic Policy LP1 refers to a housing requirement of 1,063 dpa based on the Standard Method, but this ignores the need to consider the figure generated by the Standard Method as the minimum housing requirement, and for the actual housing requirement established to account for other considerations such as those listed above. An assessment to establish the housing requirement must be carried out to ensure that the draft Local Plan is legally compliant.	Comment	The Council recognises concerns regarding reliance on strategic-scale sites. However, given the scale of housing required to meet identified needs, Garden Villages remain a necessary component of the spatial strategy, subject to ongoing confirmation of deliverability and infrastructure provision. The Plan already includes a substantial number of small and medium-sized allocations, alongside a more flexible approach to self/custom build and rural exception schemes, to support a more balanced and adaptable growth strategy. As noted elsewhere, Officers are reviewing delivery rates and trajectories within the evidence base to ensure they remain realistic, robust, and capable of supporting a sound and deliverable Plan. In relation to housing need, the comments are noted. The 8 June Local Plan Committee Report (A.2) recommends extending the Plan period to 2026–2043 and updating the housing requirement to 18,173 dwellings (1,069 per annum) based on the Government's standard method. This reflects national policy requiring a minimum 15-year plan period from adoption (anticipated before April 2028), and aligns Tendring with neighbouring authorities, supporting strategic consistency across North Essex. Evidence from the latest SHLAA indicates that around 10,100 homes will be delivered on existing commitments, including allocations, permissions, and windfall sites. This leaves a residual requirement of approximately 8,000 homes to be identified. As such, the overall scale of growth remains broadly consistent with that set out in the Preferred Options Draft.

134	13680	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The council should include a buffer of at least 10% above the minimum housing delivery requirement. The numbers set out in Policy LP1 only show an 8% buffer. Some of the sites shown for delivery in the next five years include sites where there are known capacity issues at wastewater recycling centres and should therefore not be counted. A site on land south of Steam Mill Road in Bradfield scores equally well as other nearby allocated sites, as it has various benefits it affords. The site should be allocated for residential development.	Object	In relation to housing supply, the representation states that the Council should include a buffer of at least 10% above the minimum housing requirement. However, it is not clear from the representation on what policy basis this requirement is being asserted. The Council is not aware of any requirement within the National Planning Policy Framework (NPPF), national Planning Practice Guidance (PPG), or other relevant planning policy framework which requires local planning authorities to plan for a minimum 10% buffer above their identified housing requirement in the preparation of a Local Plan. Policy LP1 has been prepared having regard to national policy requirements and is supported by the Council's housing land supply evidence. With regard to the comments concerning wastewater treatment capacity, the Council is aware of existing constraints affecting certain wastewater recycling centres within the district. The Council continues to engage positively and proactively with Anglian Water and other relevant infrastructure providers to understand these constraints and identify solutions. The Local Plan has been prepared having regard to the best available infrastructure evidence and ongoing work with Anglian Water. The Council does not consider that the existence of current capacity constraints, in themselves, warrant the exclusion of sites identified for delivery within the plan period. In respect of the site south of Steam Mill Road, Bradfield, the Council has previously considered this site through the site assessment and plan-making process. Following assessment against the Council's site selection methodology and sustainability objectives, the site was not identified for allocation. The Council does not agree with the assertion that the site performs better than other nearby allocated sites. Furthermore, the planning context within Bradfield has evolved since the Regulation 18 consultation, including changes to the proposed site allocations endorsed by the Local Plan Committee in June 2026. Having regard to the latest evidence base, site assessment work and the Council's spatial strategy, there is no justification to allocate the land south of Steam Mill Road for residential development. The Council therefore does not propose any modification to the Plan in response to this representation.
1713	13686	City & Country [1713]	Site SGG11 (Foots Farm, Clacton-on-Sea) is sustainably located adjacent to both the existing and proposed settlement boundaries of Clacton-on-Sea. As a Strategic Urban Settlement at the top of the hierarchy, Clacton should be the primary focus for housing and employment growth in the District. To support delivery and boost supply, it is important that the Council allocates a greater proportion of small and medium-sized sites (10–300 dwellings) to ensure a consistent and deliverable pipeline, particularly in the early years of the Plan. Foots Farm is well placed to meet this need. The SHLAA 2025 categorises the site as an ‘Alternative and Discounted Site’, which is strongly contested given its sustainable location, lack of constraints, and clear potential for early delivery. The principal reason for discounting appears to be its inclusion within a Strategic Green Gap. However, as set out	Comment	The comment supporting Clacton-on-Sea as the primary focus for housing and employment growth is noted and aligns with the Plan’s overall spatial strategy. However, as previously set out, sites in and around the Greater Clacton area have not been taken forward for further allocation due to the significant level of development already committed or underway. This includes approximately 1,700 homes at Hartley Gardens, alongside other major mixed-use allocations such as Rouses Farm and Oakwood Park. Collectively, these sites will make a substantial contribution to housing delivery through to 2043. Given this scale of existing and already planned growth in and around the Greater Clacton area, there are concerns that both the housing market and local services and infrastructure would be unable to accommodate further development over and above that already planned.

			in Section 8 of this representation, the Strategic Green Gap policy is not justified and should be removed. In any event, development at Foots Farm could be accommodated without undermining the function or objectives of the Green Gap.		The Plan also incorporates a wide range of small and medium-sized site allocations, supported by more flexible policies for self/custom build and rural exception schemes, to ensure a balanced and deliverable supply of housing. While the arguments in favour of allocating Site SGG11 (Foots Farm) are acknowledged, the Council maintains its position that the site should remain discounted. This reflects the established role of Strategic Green Gaps, which are integral to maintaining settlement separation and protecting sensitive landscapes and important areas of open countryside. The Council also continues to support the retention, and where appropriate strengthening, of these designations as a key element of the Local Plan strategy through to 2043.
1713	13690	City & Country [1713]	Land to the north and south of Carringtons Road, Bromley Cross was not previously submitted through the Call for Sites exercise. City & Country therefore wishes to promote this site as a sustainable and suitable allocation for development. The site extends to approximately 31.25 hectares and has the potential to deliver up to 450 dwellings. It is sustainably located to the east of Bromley Cross (Figure 7, Appendix 3). As set out in Section 3, the exclusion of Bromley Cross from the Smaller Rural Settlements category is not considered justified in planning terms. It is important that Bromley Cross is recognised as a Smaller Rural Settlement, consistent with the approach taken to other settlements of a comparable size within the District. The site's proximity to the Colliers wood Farm A120 Strategic Business Park and the TCBGC will further enhance its sustainability credentials over time.	Comment	Based on the Council's records, land to the north and south of Carringtons Road, Bromley Cross was submitted through the Call for Sites exercise. However, these sites were discounted at an early stage of the assessment process due to their relatively remote location and clear separation from existing settlements, services, and supporting infrastructure. The promoter's arguments in favour of allocating the site, and recognising Bromley Cross as a settlement in its own right, are noted. However, the Council maintains that development in this location would be insufficiently connected and would not align with the established plan-led approach to growth. In particular, the site is considered to be poorly related to the strategic road network, with access to A-roads either not readily available or difficult to achieve. Furthermore, Bromley Cross does not currently offer the range of employment opportunities, services, facilities, or infrastructure necessary to support its designation as a settlement in its own right. As such, recognising Bromley Cross in this way, and promoting significant growth in this location at this time, would conflict with the Council's spatial strategy, which prioritises development in locations with good access to public transport and the strategic road network, and which can sustainably support a broad range of services and facilities.
134	13692	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The projected housing supply does not account for holding objections from Anglian Water, which will reduce the projected housing delivery for at least the next five years. To help the council, Weeley sites CFS216 and CFS219 should be allocated for development. They are both deliverable and would be at sustainable locations. The projected housing supply does not account for holding objections from Anglian Water, which will reduce the projected housing delivery for at least the next five years. To help the council, sites at Bradfield Road West and Bradfield Road East in Wix should be allocated for development. They are both deliverable and would be at sustainable locations. A site on land south of Stacies Farm in Lawford (CFS2225) should be allocated for residential development. The site's location in a Tier Two settlement is advantageous. The council's commentary discussion about potential impacts on the setting of the Listed Building at Mistley Hall are over-stated and is not a full assessment that allows the consideration of mitigating factors.	Object	The sites referred to in the respondent's submission have previously been considered at earlier stages of the Local Plan process and were discounted for the reasons set out in the Council's Call for Sites assessment and Strategic Housing Land Availability Assessment (SHLAA). The holding objections from Anglian Water received following the Regulation 18 consultation are noted; however, these are not considered to represent overriding factors that would justify the inclusion of the sites put forward by the respondent. The Council's updated housing requirement of 18,173 dwellings (equating to 1,069 dwellings per annum) continues to be derived from the Government's standard method. This figure reflects national policy requirements to maintain a minimum 15-year plan period from adoption (anticipated prior to April 2028) and ensures alignment with neighbouring authorities, supporting a consistent strategic approach across North Essex.

					Furthermore, evidence from the most recent SHLAA indicates that approximately 10,100 dwellings are expected to be delivered through existing commitments, including allocations, extant permissions, and windfall development. This leaves a residual requirement of around 8,000 dwellings to be met on identified sites. As such, the overall scale of growth required is fully planned for and remains broadly consistent with that set out in the Preferred Options Draft. In this context, it is not considered necessary or justified to revisit previously discounted sites, including those referred to in the respondent's submission.
1713	13693	City & Country [1713]	Lambs Farm, St Osyth is situated to the north of Bypass Road and Colchester Road, St Osyth, as shown at Appendix 4. To the east it is adjacent to Saint Osyth Cemetery and to the west it is located adjacent to the development at Wellwick Field, which has planning consent for the erection of 190 dwellings and is currently being built out. The site was not previously submitted as part of the Call for Sites, but it is situated in a very sustainable location and it immediately to the north of St Osyth village centre. The site covers an area of approximately 16 hectares and has the ability to deliver approximately 300-400 dwellings. (See attached document)	Comment	The representation is noted. The Council would clarify that the land at Bypass Road was not promoted through the Council's Call for Sites process and, consequently, was not subject to the same formal site assessment and comparative evaluation undertaken for sites submitted for consideration through the Local Plan process. As a result, the Council is not in a position to agree with the assertion that the site performs better than sites proposed for allocation in the emerging Local Plan. The absence of the site from the Local Plan allocations should not, however, be interpreted as a determination by the Council that development on the site would be unacceptable in principle. The Local Plan process and the determination of planning applications are separate planning functions governed by their own statutory and policy considerations. Accordingly, nothing in the Local Plan prejudices the ability of the landowner, developer or any other interested party to bring forward proposals for the site through the development management process. Should a planning application be submitted, it would be considered on its own merits against the development plan in force at the time, together with any other material considerations, in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004. For the avoidance of doubt, the Council's comments in relation to this representation are made solely in the context of responding to the specific representation and as part of the preparation of the Local Plan and are without prejudice to the future consideration of any planning application relating to the site. The Council therefore does not propose any modification to the Plan in response to this representation.
1713	13694	City & Country [1713]	Martins Farm, St Osyth (Figure 9)(Appendix 5), was submitted through the Call for Sites exercise, however, it has not been included in the SHLAA. It is understood that a number of sites were excluded for the SHLAA and that these details will be published following the close of the Preferred Options consultation. It is considered important that an opportunity is provided to comment on these details prior to the submission of the plan to the Planning Inspectorate.	Comment	Martins Farm was submitted through the Call for Sites exercise. However, the site was discounted at an early stage of the assessment process due to its remote location and clear separation from existing settlements, services, and supporting infrastructure, including clear separation from the settlement of St Osyth. The Council has published its considerable evidence base on its website at this link and the evidence include the detailed and wide-ranging reasons for discounting sites, the Council continues to update its evidence base as the plan

			Martins Farm is being promoted for a modest leisure development, which could include a café, farm shop, bar or microbrewery. These uses would replace the recycling centre currently located towards the centre of the site. no development is proposed in the wildlife site (towards the south of Martins Farm). Positive pre-application engagement has been carried out with Natural England. Natural England is planning upgrades to the footpath network in this area which will support the proposed uses. Further to the above, the site should be allocated for a small quantum of low key commercial or leisure development. This will assist with supporting St Osyth as a tourist destination and it will promote inward investment into the District.		will progress through to Regulation 19, and all updates will posted at the above link.
1713	13697	City & Country [1713]	Land to the south of Frinton Road, is currently partly in use with static caravans on the site (Figure 10) -Appendix 6). The site is currently under-utilised and is situated within an infill gap with residential dwelling to both the east and to the west of the site. A public right of way dissects the site from Frinton Road towards the west, which provides an onward connection to Station Road. The site would make a logical infill plot for development and has the capacity to deliver approximately 4-5 dwellings on the site. Allocation of this site for housing or an amendment to the development boundary to include this site for development would assist Tendring in meeting their requirement to allocate at least 10% of their housing requirement on sites less than one hectare, as required by paragraph 73 of the NPPF. The site is very well visually contained and could be developed without any significant material harm on the landscape. The site would provide a logical allocation for development and its allocation would be justified in planning terms and therefore sound.	Comment	The site to the south of Frinton Road referred to in the representation lies well outside the defined Settlement Development Boundary (SDB) for Thorpe-le-Soken and is therefore clearly detached from this settlement. As such, it is not currently considered to be in a sustainable location for additional residential allocation through this Local Plan. While it is acknowledged that the site is partially developed and could be viewed as an infill opportunity, the Council's spatial strategy directs the majority of new housing growth to sites within defined settlement boundaries where there is better access to services, facilities, and sustainable transport options. Extending the development boundary in this location would not align with this established approach. Furthermore, the Plan already makes provision for a significant and proportionate level of housing growth to meet identified needs. This includes a balanced portfolio of sites, with a clear emphasis on small and medium-sized sites to support delivery, as well as mechanisms to allow additional windfall development. These include policy support for self-build and custom-build housing, and rural exception sites where appropriate. In light of this, and given the Plan's ability to meet national policy requirements—including the expectation to deliver a proportion of housing on sites under one hectare—the allocation of this site, or amendment to the settlement boundary, is not considered necessary to ensure the Plan is justified, effective, or consistent with national policy.
1713	13698	City & Country [1713]	Bypass Road, St Osyth was submitted through the Call for Sites but has not been included in the SHLAA (Appendix 7). As above, it is considered important that an opportunity is provided to comment on these details prior to the submission of the plan to the Planning Inspectorate. Policy SPL1 defines St Osyth as a Rural Service Centre. In total Rural Service Centres are expected to deliver around 9% of new homes in Tendring over the plan period. Bypass Road, St Osyth, is well related to St Osyth and is connected to the settlement by a footpath on Bypass Road. The site is physically unconstrained and would be a natural extension to the village which could be delivered in the next 5 years. Further to discussions with the	Comment	As set out above, the Council has published its considerable evidence base on its website at this link and the evidence include the detailed and wide-ranging reasons for discounting sites, the Council continues to update its evidence base as the plan will progress through to Regulation 19, and all updates will posted at the above link. The Council cannot identify the Bypass Road (St Osyth) site as being submitted through the call for sites. However, the absence of the site from the Local Plan allocations should not be interpreted as a determination by the Council that development on the site would be unacceptable in principle. The Local Plan

			Council, it has been agreed that the site does not have any ecological constraints. Further to the above, Bypass Road, St Osyth should be allocated for 10 dwellings. This would assist Tendring with meeting their requirement to allocate at least 10% of their housing on sites less than 1 hectare in size, as required by paragraph 73 of the NPPF. Accounting for the location of the site, its allocation could also be supported by way of a change to the development boundary to include the site. This would be logical accounting for the location of the site, between Bypass Road and Colchester Road.		process and the determination of planning applications are separate planning functions governed by their own statutory and policy considerations. Accordingly, nothing in the Local Plan prejudices the ability of the landowner, developer or any other interested party to bring forward proposals for the site through the development management process. Should a planning application be submitted, it would be considered on its own merits against the development plan in force at the time, together with any other material considerations, in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004.
774	13716	Trinity College [774]	The College is promoting further land west of Church Road, Brightlingsea that is not currently proposed for allocation. Further technical assessments and masterplanning work has been commissioned to show how this land could come forward to enable a comprehensive approach to the northern expansion of Brightlingsea that resolves the relationship of the town with the surrounding landscape and heritage assets for the long term. This land was also put forward to the Call for Sites and has been assessed in the SHLAA as site CFS2214	Comment	The additional information and supporting evidence submitted by the promoter have been noted and carefully considered by the Council. However, the material provided is not sufficient to overcome the key reasons for the site's exclusion from the draft allocations. In particular, there remain significant concerns regarding the ability to achieve a safe and suitable access to the site. This issue has been considered in consultation with Essex County Council Highways, and the Council remains unconvinced that an acceptable access solution can be delivered, notwithstanding the further information submitted. As such, the site does not currently demonstrate that it can meet the necessary requirements in terms of highway safety and suitability. In addition, and following multiple discussions with affected parishes, local politicians and following local plan committee meetings, there are wider strategic concerns relating to the scale and direction of growth proposed through this and other nearby sites located to the north and north-west of the existing settlement. Development extending significantly to the north and north-west of Brightlingsea risks undermining the established spatial pattern of the settlement, which the Plan seeks to reinforce and manage in a coherent and sustainable manner. The site is also located within the Coastal Protection Belt (CPB), where policy seeks to strictly control development. At this time, there is no clear functional or operational need, nor any overriding justification, for a development of this scale within the CPB that would outweigh the policy constraints and potential harm to the character and setting of the area. Taking these factors into account, the Council does not consider that the site represents a suitable, available, or achievable allocation at this stage, and therefore it has not been included in the draft Plan.
1439	13876	Catesby Estates [1439]	Catesby support Draft Strategic Policy LP1 which sets out that the Council will deliver a minimum of 18,071 new homes between 2026 and 2042. The Site falls within proposed allocation SAMU5, which is identified for approximately 1,650 new homes, and is capable of contributing between 593 and 1,033 dwellings on land in the control of Catesby. If integrated with adjacent land parcels within other ownerships, the overall delivery of SAMU5 could potentially achieve the quantum of development envisaged. Based on	Support	Comment noted.

			delivery assessments, there is a realistic prospect that a significant number of these dwellings could be delivered within the first five years of the Plan period, demonstrating that the Site can make a meaningful contribution to achieving the Council's housing supply objectives in line with the NPPF.		
1181	14009	Pigeon Investment Management Ltd (Peter Healey) [1181]	Stop building on farm land and develop brownfield sites in the towns.	Comment	The Council recognises concerns about the loss of agricultural land and the preference for development on brownfield sites. However, Tendring has a very limited supply of previously developed land, much of which has already been brought forward for development. As a result, and in order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this land is classified as best and most versatile agricultural land, which limits the ability to avoid such impacts. The Local Plan seeks to balance these competing pressures by prioritising sustainable locations and making efficient use of available land. However, given the scale of housing need and the limited availability of brownfield opportunities, some loss of greenfield land is unavoidable.
119	14058	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	HBF supports meeting housing needs but considers the proposed 8% contingency insufficient given the reliance on large, complex new settlements that are prone to delay. With around half of planned homes on sites of 900+ dwellings, a contingency closer to 20% is recommended. HBF's analysis indicates the Council may lack a five year housing land supply at adoption and during the mid plan period, suggesting weaker supply resilience. HBF also stresses that at least 10% of homes must be delivered on identified small sites, not windfalls, to ensure compliance with the NPPF and to support SME housebuilders and market diversity.	Comment	The Council is not aware of any requirement within the National Planning Policy Framework (NPPF), national Planning Practice Guidance (PPG), or other relevant planning policy framework which requires local planning authorities to plan for a minimum 20% 'contingency'. Policy LP1 has been prepared having regard to national policy requirements and is supported by the Council's housing land supply evidence. The Plan already makes provision for a significant and proportionate level of housing growth to meet identified needs. This includes a balanced portfolio of sites, with a clear emphasis on small and medium-sized sites to support delivery, as well as mechanisms to allow additional windfall development. These include policy support for self-build and custom-build housing, and rural exception sites where appropriate.
1643	14209	Bradfield Fruit Farm (Johnny Piper) [1643]	Our representation objects to Policy LP1 (Housing Supply) on the basis that its current site selection approach risks delivering an unsound and undeliverable housing supply. It argues LP1 over relies on a small number of large or constrained sites, including the Rose site and major strategic allocations, which may not come forward in practice. By excluding the immediately deliverable Bradfield Fruit Farm site, LP1 is said to create a "phantom" housing supply, weaken five year land supply resilience, and increase the risk of failing the Housing Delivery Test and soundness assessment.	Object	The Council notes the concerns raised regarding the deliverability and composition of the housing supply under Policy LP1. The approach to site selection has been informed by a detailed and proportionate evidence base, including site assessments, infrastructure considerations, and ongoing engagement with land promoters and infrastructure providers. The housing trajectory, delivery assumptions, and overall housing requirement will continue to be tested and refined as the evidence base is updated throughout the plan-making process. This includes ongoing monitoring of lead-in times, build-out rates, and site-specific constraints to ensure that assumptions remain realistic and justified. The Council will keep housing delivery under active review to ensure that the Plan is positively prepared, justified, and effective, and that it is supported by a supply that is deliverable and sufficiently flexible. This includes maintaining an appropriate buffer and resilience within the supply to respond to potential delays

					on individual sites, without introducing unnecessary or unjustified allocations at this stage.
505	14231	ADP Ltd (Mr Andrew Ransome, Planning Director) [505]	This representation objects to the exclusion of Land at Bradfield Fruit Farm, The Street, Bradfield, Essex, CO11 2UU. The SHLAA concludes that the site would represent an incongruous extension into the countryside and raise concerns regarding its relationship with the adjacent listed building, Maltings Cottage. However, this assessment does not accurately reflect the site's spatial context or its relationship with the existing settlement pattern. In reality, the site is centrally located within the village, positioned between and in close proximity to key community assets including the village hall, children's play area and other core village services, and effectively forms part of the functional heart of Bradfield rather than an outlying parcel. As such, it represents one of the most sustainable locations for growth within the settlement, with future residents able to readily access local services and facilities on foot.	Object	This objection is noted. The Council has carefully considered the site in the context of the wider strategy for Bradfield, including the spatial pattern of development, local character, and feedback received through the consultation process. In particular, representations from the Parish Council and local residents raised concerns regarding the originally proposed single allocation (MSA9) of approximately 100 dwellings, notably its relationship with the existing settlement form and the potential for a large, estate-style development to conflict with the established linear character and incremental growth pattern of the village. Having regard to these concerns, the Council has reviewed its approach and concluded that a more dispersed and proportionate pattern of growth across a number of smaller sites would better reflect the character of Bradfield and support sustainable development. As a result, the Council is proposing to replace the single larger allocation with a series of smaller allocations, reducing the overall quantum of development in the village from 100 to approximately 75 dwellings. Within this revised strategy, part of the Bradfield Fruit Farm site has been identified as suitable for allocation. Specifically, the northern section of the site, located adjacent to the playing field, is now proposed as a housing allocation for approximately 30 dwellings (MSA36). This reflects a more limited and contained form of development that better relates to the existing settlement pattern, whilst avoiding the more sensitive parts of the wider site. This approach demonstrates that the Council has taken a balanced and evidence-led view, responding to local concerns where this aligns with sound planning principles, whilst ensuring that site selection remains consistent with the overall spatial strategy and deliverability considerations of the Plan. It should not be taken as a precedent for the inclusion of additional or alternative sites, which continue to be assessed against the same consistent and robust criteria.
441	14250	Richborough [441]	Our representation challenges the robustness of Policy LP1, arguing that past housing delivery has only met an understated previous requirement and should not justify complacency. It supports using the Standard Method but stresses this provides a minimum need, with evidence suggesting higher demand based on census data and migration trends. The document raises strong concerns about over-reliance on new Garden Villages to meet housing needs, given delivery risks and delays, and calls for greater flexibility, more short to medium term allocations, and contingency to maintain housing supply and five year land supply throughout the plan period	Comment	The Council notes the concerns raised regarding the robustness and deliverability of housing supply under Policy LP1. The Plan has been prepared using a comprehensive and proportionate evidence base, including detailed site assessments, infrastructure considerations, and ongoing engagement with relevant stakeholders. The housing requirement reflects the Standard Method and is understood to represent a minimum level of need. The Plan responds to this by providing a balanced and flexible supply of sites, including a mix of large strategic allocations and smaller sites, alongside policy support for windfall development, self/custom build, and rural exception schemes. While larger sites, including Garden Village proposals, form part of the strategy, the Council has sought to ensure that delivery is supported by a range of short,

					medium, and longer-term opportunities to maintain supply and resilience over the plan period. The housing trajectory and delivery assumptions will continue to be tested and refined as the evidence base evolves. The Council will keep delivery under review to ensure the Plan remains positively prepared, justified, and effective, with sufficient flexibility to respond to delays or changes in circumstances, without introducing unnecessary or unjustified allocations at this stage.
674	14257	AWG Landholdings [674]	Our client, AWG Land Holdings Ltd, is generally supportive of Strategic Policy LP1. The draft policy identifies a minimum requirement of 18,071 (net) homes over the Local Plan period 1st April 2025 to 31st March 2042. It also sets out that the supply of new homes to March 2024 will be delivered from the following sources: Whilst our client welcomes the identification of a broad range of housing supply sources, it is notable that the allocations proposed are limited to strategic and medium-sized sites. It is important to emphasise and not underestimate the role of smaller scale allocations, particularly in supporting rural communities. A degree of flexibility is therefore required to ensure that planning policies enable villages to grow and thrive, helping to maintain and enhance the vitality of rural communities, as per Paragraph 83 of the NPPF (December 2024; as amended February 2025). It would therefore be prudent to diversify the housing trajectory to incorporate more smaller scale allocations, which could contribute to ensuring a more robust housing supply across the plan period. It is also relevant to note the requirement that Local Plans have 15 years of the plan period remaining at the point of adoption, which assumes that the emerging Local Plan is adopted no later than the end of March 2027. We reserve the right to comment further on the policy wording within future stages of Local Plan consultation.	Comment	The Council notes the concerns raised regarding the robustness and deliverability of housing supply under Policy LP1. The Plan has been prepared using a comprehensive and proportionate evidence base, including detailed site assessments, infrastructure considerations, and ongoing engagement with relevant stakeholders. The housing requirement reflects the Standard Method and is understood to represent a minimum level of need. The Plan responds to this by providing a balanced and flexible supply of sites, including a mix of large strategic allocations and smaller sites, alongside policy support for windfall development in appropriate locations and subject to criteria, self/custom build, and rural exception schemes. While larger sites, including Garden Village proposals, form part of the strategy, the Council has sought to ensure that delivery is supported by a range of short, medium, and longer-term opportunities to maintain supply and resilience over the plan period. The housing trajectory and delivery assumptions will continue to be tested and refined as the evidence base evolves. The Council will keep delivery under review to ensure the Plan remains positively prepared, justified, and effective, with sufficient flexibility to respond to delays or changes in circumstances, without introducing unnecessary or unjustified allocations at this stage. The Council notes the comment around the likely adoption date and has build in the necessary flexibility allowing for a potential adoption date of in 2027 or early 2028 with a plan period of up to and including 2043.
441	14270	Richborough [441]	Our representation raises concerns that Policy LP1 underestimates housing need and relies too heavily on past delivery against an artificially low target. It argues that historic over-delivery does not demonstrate needs being met, citing Census evidence of stronger population growth. While supporting use of the Standard Method, it stresses this sets only a minimum requirement and should be uplifted to reflect unmet need, migration pressures and market signals. The strategy is criticised for over-reliance on new Garden Villages, risking delivery failure and insufficient flexibility to maintain a five-year housing land supply.	Comment	The housing requirement reflects the Standard Method and is understood to represent a minimum level of need. The Plan responds to this by providing a balanced and flexible supply of sites, including a mix of large strategic allocations and smaller sites, alongside policy support for windfall development in appropriate locations and subject to criteria, self/custom build, and rural exception schemes. The housing trajectory and delivery assumptions will continue to be tested and refined as the evidence base evolves. The Council will keep delivery under review to ensure the Plan remains positively prepared, justified, and effective, with sufficient flexibility to respond to delays or changes in circumstances, without introducing unnecessary or unjustified allocations at this stage.

1651	14276	Willow Park Group [1651]	These representations are submitted on behalf of Willow Park Group, who is promoting land to the west of Main Road, Great Holland. Whilst we note that the allocation is for 10 no. of dwellings, it does have potential for up to 25 dwellings, using existing density levels and follow the existing pattern of frontage of development. Section 11 of the NPPF specifically seeks to make effective use of land. Paragraph 129 states that planning policies and decisions should support development that makes efficient use of land. This site can be fully deliverable within a 0-5 year timeframe. This site lies within the heart of the village, benefitting from existing road frontages to both the north and south, and can be considered a logical and sustainable infill opportunity that respects the established built form of the settlement. This proposal represents proportionate growth. With 25 dwellings, the development will offer a modest but meaningful contribution to local housing supply, including the potential for affordable and smaller homes to support local housing needs. The site's location within the village core helps ensure that any new development will integrate sensitively with the existing character of Great Holland. In summary, the proposal offers a sustainable and proportionate development opportunity that: Helps diversify the housing mix and support community sustainability; Makes effective use of a well-located infill site; Benefits from proximity to public transport and nearby service centres; Respects the character and context of Great Holland. This scheme represents a pragmatic and policy-compliant opportunity to support housing delivery in a rural area while helping to sustain and strengthen the vitality of Great Holland.	Comment	The comments are noted. However, the Council does not consider that increasing the capacity of the site beyond the proposed allocation is appropriate at this time. The Council's assessment concludes that more extensive development, particularly development extending in depth away from Main Road, would introduce additional layers of built form that are not characteristic of Great Holland. The prevailing settlement pattern is strongly linear, with development focused along the main road frontage and a clear transition to rural and agricultural land beyond. Encroachment into this hinterland would be out of keeping with the established character of the village and risks resulting in harm to the surrounding landscape. The proposed allocation has therefore been limited to a scale and form of development that reflects this established pattern, focusing on frontage development only. This approach is consistent with the site assessment work underpinning the Plan, which has considered all promoted sites against a consistent set of criteria. While the Council supports the efficient use of land, this must be balanced against the need to respect local character and settlement form. In this case, a higher-density or deeper form of development would not achieve this and is therefore not considered appropriate.
1508	14278	Gladman Developments Ltd (Matthew Jones, Senior Policy & Promotions Planner) [1508]	It is questioned whether Tendring's housing supply is deliverable and sufficiently robust. While the Plan proposes 18,071 homes with an 8% buffer, concern is raised that this is inadequate given the high-risk reliance on three Garden Villages. Previous North Essex plan strategies were found unsound due to over-optimistic delivery assumptions. To avoid repeating this, more small and medium-sized sites around existing settlements should be allocated to improve early delivery and reduce reliance on windfalls. The promoted Long Road, Mistley site is presented as a sustainable option, well located near existing services and rail stations.	Comment	The Council notes the concerns raised regarding the robustness and deliverability of housing supply under Policy LP1. The Plan has been prepared using a comprehensive and proportionate evidence base, including detailed site assessments, infrastructure considerations, and ongoing engagement with relevant stakeholders. The housing requirement reflects the Standard Method and is understood to represent a minimum level of need. The Plan responds to this by providing a balanced and flexible supply of sites, including a mix of large strategic allocations and smaller sites, alongside policy support for windfall development in appropriate locations and subject to criteria, self/custom build, and rural exception schemes. While larger sites, including Garden Village proposals, form part of the strategy, the Council has sought to ensure that delivery is supported by a range of short,

					medium, and longer-term opportunities to maintain supply and resilience over the plan period. The housing trajectory and delivery assumptions will continue to be tested and refined as the evidence base evolves. The Council will keep delivery under review to ensure the Plan remains positively prepared, justified, and effective, with sufficient flexibility to respond to delays or changes in circumstances, without introducing unnecessary or unjustified allocations at this stage.
1508	14285	Gladman Developments Ltd (Matthew Jones, Senior Policy & Promotions Planner) [1508]	Gladman are currently promoting Land at Long Road, Mistley for residential development. Gladman are disappointed that our site was not assessed correctly by the Council, despite a clear location plan being submitted with the Call for Sites submission. Only half of the site was assessed and thus, the site was determined to be unsuitable. This raises severe concerns with the Council's overall assessment of all the available sites submitted to the Call for Sites consultation as, if other sites were also assessed incorrectly, this would create a false reality of the land availability in Tendring and ultimately impacting the spatial strategy and draft housing allocations of this draft plan. (See attached document for details)	Comment	This comment is noted. The Council strongly refutes the allegations made in this submission. All sites submitted through the two Call for Sites exercises were assessed in a consistent and transparent manner, having regard to clear overarching guiding principles set out in earlier Committee reports, and in accordance with a defined and robust analysis strategy applied consistently throughout the process. The Council's assessment of the suitability of the Long Road (Mistley) site for residential allocation was based on Location Map 2023-042 101 Rev – submitted by the promoter as part of one of the call for sites exercises. Notably, this differs from the location plan submitted as part of the Regulation 18 consultation response, which introduces further inconsistency into the representation. The Council does not accept the assertion that there have been "significant material changes to the immediate context of the site and landscape setting" since the relevant appeal decision. No substantive evidence has been provided to support this claim. There continue to be avenues open to the promoter such as continuing to object to the exclusion of this site as part of the local plan process, or submit a planning application, or both. Fundamentally, the entirety of the site lies within a designated Conservation Area and the Strategic Green Gap. These are significant policy constraints that render the site unsuitable for residential allocation at this time. On this basis, and in accordance with the Council's guiding principles and site assessment methodology, the site was appropriately subject to an early stage sift. Accordingly, the Council is satisfied that the site was assessed properly and consistently, and that its conclusions are both sound and justified.
795	14293	Boxford Suffolk (Farms) Ltd [795]	Policy LP1 sets out the supply source(s) to March 2033 of housing delivery. Of the 12,545 total completions (net) stated, only 202 of these are to be sourced from "Medium Sized Allocation (MSA Policies)". This represents a mere 1.61% of housing delivery. This clearly conflicts with the requirement found within national policy in the draft NPPF that requires 10% of all allocations to fall within this site size category. Even appreciating that delivery is not equal to allocation, Policy LP1 demonstrates a clear underusage of MSA Policies to meet housing targets, and simultaneously a clear over-reliance on Strategic Allocations and the Tendring Colchester Borders Garden Community development.	Comment	The Council notes the concerns raised regarding the proportion of housing delivery from medium-sized sites and the interpretation of draft national policy. However, Policy LP1 relates to anticipated delivery rather than a direct expression of site allocations, and it is therefore not appropriate to draw a direct comparison with draft NPPF requirements relating specifically to allocations. The Plan has been prepared on the basis of a comprehensive and proportionate evidence base, with site selection informed by sustainability considerations, infrastructure capacity, deliverability, and policy constraints.

			It is requested that this conflict is investigated and addressed as there is a clear directive to Local Planning Authorities in Policy HO6(a) of the draft NPPF to ensure that at least 20% of all land allocated for housing in a district is made up of sites less than 2.5 hectares in size (with 10% of all allocated sites specifically falling between 1.0 and 2.5 hectares). Sites 202, 3261 and 3262 are valuable assets in this regard and would contribute towards rebalancing Tendring District Council's allocations in accordance with the emerging Framework. Another point the Council may be minded considering is that under the draft NPPF, it is likely that the development of Sites 202, 3261 and 3262 for speculative housing development would be supported. Not least due to any future proposals finding support (and attracting substantial weight as a result) from Policy HO7: Meeting the Needs for Homes, a policy that supports proposals that contribute towards the needs of the local community. The optimal outcome is therefore to allocate Sites 202, 3261 and 3262 so that they may be brought forward in collaboration with Tendring District Council, delivering an agreed scale and housing mix that provides local benefits as identified in the Consultation Document and above.		This has resulted in a strategy that includes a range of site sizes and types, including strategic allocations, smaller sites, and an allowance for windfall development, ensuring flexibility and resilience in supply over the plan period. The Council does not agree that there is an over-reliance on strategic allocations. These sites are necessary to meet identified housing needs in a coordinated and sustainable manner, particularly where infrastructure provision and place-making objectives are key considerations. In respect of draft national policy, it remains subject to change and carries limited weight at this stage. The Council will continue to monitor its progression and will consider any implications as part of plan preparation. At present, the Council is satisfied that the Plan strikes an appropriate balance in its site selection strategy. With regard to Sites 202, 3261 and 3262, the Council consider it to be inappropriate to speculate on the acceptability of any future speculative proposals. Such proposals would be considered on their individual merits, having regard to the development plan, material considerations, and the prevailing national policy framework at the time of determination.
1530	14307	Berrys (Lauren May, Senior Planning Consultant) [1530]	That a site which has previously been submitted to the Local Planning Authority at land to the west of Bloomfield Avenue, Frinton-on-Sea should be included as a proposed housing allocation for up to 200 dwellings.	Comment	Comment noted. The site at land to the west of Bloomfield Avenue, Frinton-on-Sea has been considered by the Council through its Call for Sites and site assessment process. However, it was subject to an early-stage sift due to its location within the Strategic Green Gap between Kirby-le-Soken and Frinton-on-Sea. The Council acknowledges the promoter's argument that residential development could be delivered alongside appropriate levels of open space while maintaining the perceived function and character of the Green Gap. However, the Council does not agree with this position. The Strategic Green Gap designation represents a significant and longstanding policy constraint, intended to prevent coalescence between settlements, preserve their distinct identities, and protect the character of the intervening landscape. Proposals that would encroach into the Green Gap raise complex planning considerations and, in this instance, the Council considers that allocation of the site would be directly contrary to the consistent and precautionary approach it has applied across all sites affected by this designation. In applying its transparent and consistent site assessment methodology, the Council has concluded that the site is unsuitable for allocation for residential development and it has therefore not been taken forward within the draft Plan. Should the promoter wish to advance their case, in addition to potentially continuing to object to the exclusion of this site, another avenue could be the submission of a planning application which is another mechanism for these arguments to be fully tested and assessed on their merits, having regard to all relevant planning considerations.

1718	14309	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning support the policy to deliver the minimum increase of 18,071 (net) of new homes between 1 April 2025 and 31 March 2042 to support economic growth and meet objectively assessed requirements for future housing in the District. We also support allocations in Table LP1 as they relate to sites our client has interests in – namely SAH1 and MSA1.	Support	Comment noted.
1717	14321	Telereal Securitised Property GP Limited [1717]	The allocation of the site for residential-led redevelopment under Draft Housing Allocation MSA5 in Draft Strategic Policy LP1 is positively noted and strongly supported by our Client. The draft capacity of 15no. residential dwellings, as quoted in Table LP1, is considered realistic, proportionate and deliverable. Our Client further confirms that, as abovementioned, the site is still available and deliverable during the Draft Local Plan period. However, our Client considers that the next iteration of the Draft Local Plan, should refer to site allocation capacities as 'indicative' (or 'minimum') figures; i.e. adjust Paragraph 5.14 and/or Table LP1 to be clear that this relates to 'indicative' or 'minimum' capacities/new homes for each site. This is (1) not only reflective of the Council's reference to 'a minimum new homes increase of 18,071 (net) between 1 April 2025 and 31 March 2042' in Draft Strategic Policy LP1 (our emphasis), but also (2) ensures that the pre-application/planning application process can determine final site capacities (with a view of optimising allocated sites in accordance, and thereby maintaining consistency, with Chapter 11 of the NPPF) which may found to be higher than currently anticipated. It also avoids a misinterpretation of this key strategic policy, i.e. with housing numbers being regarded as maxima or exact targets, whilst adding flexibility for developers (and decision-makers).	Support	Comments noted. The Council recognises the support expressed for the allocation and agrees that clarity around site capacities is important. The Plan already uses a range of terminology in this regard, including "approximately", "around", "minimum", and "up to", to reflect the fact that capacities are indicative and may vary as sites come forward through the planning application process. However, the Council acknowledges that this approach is not applied consistently across all allocations. Providing a clearer and more uniform expression of housing numbers—such as confirming whether these are indicative or minimum figures—could improve clarity, avoid misinterpretation, and better reflect the flexibility inherent in the Plan. This is a matter the Council will consider as part of preparing the next iteration of the Local Plan.
1692	14354	Lewis & Scott Homes [1692]	(Comments on Chapter 9 but also of relevance to Chapter 5) Whilst we do not object to any specific allocation, we do have concerns regarding the absence of any specific requirements to deliver specialist accommodation for the older population in the District. We therefore OBJECT to the chapter in its entirety and suggest that it be amended to explain how the needs of this significant proportion of the population will be met through these allocations. Our suggestion is that all allocations of 100 homes to include a specific requirement to deliver at least 10% of the homes as specialist accommodation for older people, the scale and nature of which should reflect the needs identified in the SHMA. In doing so, it will need to cross refer to other policies that we have requested changes to so that it is clear what is required from these sites. The Council may also wish to review the medium sites that it has identified and consider allocating these as specialist housing sites for the older community. Doing so would help to ensure that developers delivering this type of accommodation can fairly compete in the marketplace.	Object	The Council notes the concerns raised regarding the provision of specialist accommodation for the older population and the suggested approach to securing this through site allocations. The Council's approach is informed by the most up-to-date Strategic Housing Market Assessment (SHMA), which is reviewed regularly and provides a robust and proportionate evidence base on the demographic profile of the District, including the needs of an ageing population. This evidence has directly informed the preparation and wording of Policies LP2 and LP3, which collectively seek to ensure that housing needs across all sectors of the community are addressed. However, the Council does not consider it appropriate to impose a blanket or prescriptive requirement—such as mandating a fixed percentage of specialist accommodation on all sites over a certain size. Such an approach risks being overly rigid, may not respond appropriately to site-specific circumstances, could potentially undermine viability and deliverability, or inadvertently advocate for one type of accommodation over another (and where evidence exists of a shortage of both). Importantly, it must also be evidence-led and proportionate to identified need, rather than arbitrarily applied. Instead, the Plan adopts a flexible and supportive framework. In particular, Policy LP10 (Care, Independent and Assisted Living) has been specifically

					strengthened compared to its existing equivalent. This policy positively supports the delivery of a wide range of specialist accommodation, including care homes, extra-care housing, and other forms of supported and independent living, in sustainable locations. This approach aligns with both identified housing need and the Council's wider Economic Development Strategy, recognising the growing importance of the care sector. The Council also notes the suggestion regarding the allocation of specific sites for specialist accommodation. While this can be appropriate in certain circumstances, the Council considers that enabling such development through a criteria-based and permissive policy framework allows for greater flexibility, supports market delivery, and ensures proposals can come forward in the most suitable and sustainable locations. Notwithstanding the above, the Council acknowledges that the supporting text could more clearly explain how the suite of policies within the Plan will work together to meet the needs of the District's ageing population. This is a matter that will be considered as part of the next iteration of the Local Plan to improve clarity and usability for all stakeholders.
542	14357	R F Clarke Farms Partnership (Mr Robert Clarke, Partner) [542]	New site for consideration - see attached representation. St Osyth	Comment	The Council has considered the updated submission and supporting information provided in relation to the proposed allocation at Point Clear. While the additional material, including reference to an increase in identified housing need, is noted, it does not alter the Council's overall position. The site was previously discounted following a robust and consistent site assessment process, and the reasons for that conclusion remain both valid and significant. In particular, the scale of development proposed is extensive and would represent a substantial and unjustified expansion in a location that is not identified within the settlement hierarchy. Point Clear is inherently constrained in sustainability terms, and development at this scale would not align with the spatial strategy of directing growth to the most sustainable locations. The Council's approach has been to apply its guiding principles consistently across all sites, resisting development proposals that would introduce significant growth in less sustainable areas. To depart from this approach in this instance would undermine the overall strategy and coherence of the Plan. Accordingly, the Council does not consider that the marginal increase in housing need (in terms of the updated numbers) outweighs the clear and compelling reasons for previously discounting the site. There is therefore no justification to revisit or amend the earlier conclusion, and the site has not been taken forward for allocation.
53	14379	M Scott Properties Ltd [53]	My comments on the Plan period and housing trajectory relate to concerns that the current timeframe and delivery assumptions are unrealistic. The plan period of 2025–2042 does not fully reflect the long-term nature of large-scale developments such as Garden Villages, where delivery is likely to be significantly delayed based on evidence. The housing trajectory appears overly optimistic, with expected build-out rates and start dates unlikely to be	Comment	The Council notes the concerns raised regarding the plan period and the realism of the housing trajectory, particularly in relation to the delivery of larger strategic sites. The 2027/28–2043 plan period has been selected to align with national guidance and provides an appropriate and proportionate timeframe over which to plan for

			achieved, risking failure to meet housing targets and maintain supply. A longer plan period and greater reliance on smaller, deliverable sites are suggested to ensure a more realistic and sustainable approach to housing delivery.		the District's identified housing needs. The Council is satisfied that this timeframe allows for both the delivery of strategic sites, including longer-term developments, and a continued supply of smaller and medium-sized sites to support early and ongoing delivery. The housing trajectory has been informed by a comprehensive and proportionate evidence base, including site-specific information, infrastructure considerations, lead-in times, and engagement with site promoters and developers. The Council does not agree that the trajectory is overly optimistic; rather, it reflects realistic assumptions based on available evidence and professional judgement. Importantly, the strategy is not reliant on a single source of supply. It incorporates a mix of site sizes and types, including strategic allocations, smaller sites, existing commitments, and an allowance for windfall development. This diversity is intended to provide flexibility and resilience, helping to ensure that housing delivery can be maintained even if there are variations in build-out rates or delays on certain sites. While the Council acknowledges that larger sites can have longer lead-in times, these are necessary to deliver comprehensive development, infrastructure, and place-making objectives in a coordinated manner. The inclusion of such sites is therefore a deliberate and justified component of the spatial strategy, rather than an over-reliance. The Council will continue to monitor delivery closely through its Authority Monitoring Report and will keep its assumptions under review. Should circumstances change, the Plan framework provides sufficient flexibility to respond appropriately. At this stage, the Council is satisfied that the plan period and housing trajectory are realistic, justified, and consistent with national policy, and that no amendment is required.
601	14388	Edward Gittins and Associates (Mr Edward Gittins, Chartered Town Planner) [601]	Arising from our separate Representations in relation to Policy SAMU8, which propose a Stage 1 Development Area for Hare Green Garden Village based on a Masterplan, we believe that housing numbers can be delivered during the first 5 year period. We also consider that an alternative level of housing completions should be included in Table 1 in relation to the second and third 5 year periods.	Comment	Comments noted. The Council welcomes ongoing engagement with the site promoter in relation to the Hare Green Garden Village broad location, including the representations made in respect of delivery assumptions and phasing. The housing trajectory has been informed by site-specific evidence, including anticipated lead-in times, infrastructure requirements, and delivery constraints associated with large-scale developments. While early delivery within the first five-year period is noted, the Council's assumptions reflect a cautious and evidence-based approach to ensure the trajectory remains realistic and deliverable. The Council will continue to work constructively with the promoter to review and refine delivery assumptions as further masterplanning and technical work is undertaken. Where robust evidence demonstrates that adjustments to housing completions within the relevant five-year periods are justified, appropriate, and achievable, these will be considered as part of the ongoing plan preparation process.

774	14409	Trinity College [774]	Trinity College Cambridge supports the allocation of its land on land east of Church Road, Brightlingsea (policy SAH4) and highlights the availability of further land west of Church Road that is under its control and could add further housing land supply and resilience to the Plan (SHLAA ref: CFS2214). This land is not proposed for allocation but could come forward to deliver up to a further 300 dwellings. A range of technical evidence is submitted alongside these representations to demonstrate its deliverability, taking account of landscape, heritage and other constraints. We urge the Council to carefully consider the benefits that further allocations at Brightlingsea could deliver for the resilience of the Plan. See large document attached.	Comment	The Church Road Brightlingsea site (SAH4) has been removed from the Local Plan in light of issues brought up by representations to the Preferred Options consultation. To replace housing numbers lost by the deletion of the site and to ensure a more dispersed delivery of the required housing numbers, a number of smaller sites have bene included in the Local Plan for Brightlingsea. This change would bring about a reduction of the number of homes from 325 to 175 in Brightlingsea.
982	14421	Turley (Claire Newbury, Associate Director) [982]	The updated Local Plan significantly increases housing need, doubling annual targets. While large strategic sites and new Garden Villages are proposed, delivery timescales are unrealistic, with such developments taking years to produce housing and unlikely to contribute early in the Plan period. This risks under-delivery in the first five years. A more pragmatic approach is recommended, including allocating smaller, deliverable sites in sustainable locations—such as Plains Farm—to ensure early housing supply and provide a more reliable and flexible housing trajectory.	Comment	The Council notes the concerns raised regarding the plan period and the realism of the housing trajectory, particularly in relation to the delivery of larger strategic sites. The 2027/28–2043 plan period has been selected to align with national guidance and provides an appropriate and proportionate timeframe over which to plan for the District's identified housing needs. The Council is satisfied that this timeframe allows for both the delivery of strategic sites, including longer-term developments, and a continued supply of smaller and medium-sized sites to support early and ongoing delivery. The housing trajectory has been informed by a comprehensive and proportionate evidence base, including site-specific information, infrastructure considerations, lead-in times, and engagement with site promoters and developers. The Council does not agree that the trajectory is overly optimistic; rather, it reflects realistic assumptions based on available evidence and professional judgement. Importantly, the strategy is not reliant on a single source of supply. It incorporates a mix of site sizes and types, including strategic allocations, smaller sites, existing commitments, and an allowance for windfall development. This diversity is intended to provide flexibility and resilience, helping to ensure that housing delivery can be maintained even if there are variations in build-out rates or delays on certain sites. While the Council acknowledges that larger sites can have longer lead-in times, these are necessary to deliver comprehensive development, infrastructure, and place-making objectives in a coordinated manner. The inclusion of such sites is therefore a deliberate and justified component of the spatial strategy, rather than an over-reliance. The Council will continue to monitor delivery closely through its Authority Monitoring Report and will keep its assumptions under review. Should circumstances change, the Plan framework provides sufficient flexibility to respond appropriately. At this stage, the Council is satisfied that the plan period and housing trajectory are realistic, justified, and consistent with national policy, and that no amendment is required.

982	14449	Turley (Claire Newbury, Associate Director) [982]	Catesby argues that a more robust housing strategy should include smaller, deliverable sites in sustainable locations to support early delivery while larger schemes progress. Plains Farm is presented as a suitable, available and achievable site, capable of delivering around 90 homes within the first five years. It offers multiple benefits, including housing mix, open space, biodiversity gains and economic impacts. The site has no significant constraints, aligns with planning policy and is in a highly sustainable location, making it a strong candidate for allocation despite its proximity to the TCBGC.	Comment	Comment noted. The Council recognises the general point regarding the role of smaller, deliverable sites in supporting early housing delivery; however, this is already addressed through the Plan's overall strategy, which includes a mix of site sizes and sources of supply. In respect of Plains Farm, the site is located within the Parish of Ardleigh and is therefore subject to an early-stage sift. This reflects the Council's consistent approach to excluding locations where significant levels of development are already committed or planned, most notably in relation to the Tendring–Colchester Borders Garden Community and associated growth. These areas are expected to accommodate substantial housing delivery over the plan period, and it is not considered appropriate or sustainable to introduce additional allocations beyond this level of growth. On this basis, the Council does not consider Plains Farm to be suitable for allocation and is satisfied that sufficient deliverable sites have been identified elsewhere without its inclusion.
Community Representatives					
953	3480	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
1520	13807	The Harwich Society (Richard Colley) [1520]	The sheer scale of development proposed in the Review Plan is excessive in relation to recent housing trends and the scale is unsuited to the character of the coastal area.	Comment	The housing requirement has been derived using the Government's Standard Method and therefore represents a minimum level of need that the Plan must address. The scale of development proposed is necessary to meet this identified need in full, while also supporting economic growth and maintaining a deliverable housing supply over the plan period. The spatial strategy has been carefully developed to ensure that growth is directed to the most sustainable locations and delivered in a coordinated manner. This includes the use of strategic sites where comprehensive planning can secure the necessary infrastructure, high-quality design, and strong place-making outcomes, whilst also protecting the character and function of more sensitive coastal areas. The Council considers that the Plan strikes an appropriate and justified balance between meeting housing needs and respecting the distinctive character of the District, including its coastal environment, and is supported by a robust and proportionate evidence base.
1550	13975	PACE (John Hall) [1550]	Speculative Developers are likely to apply for planning permission to develop land outside the Settlement Development Boundaries in the Local Plan on the basis that the current Local Plan is now out of date because of the lifting of housing supply from 550 houses per year to 1063 houses per year. There should therefore be a clause in LP1 which prevents or discourages Speculative Developers from making these Planning applications – otherwise all the good work of the Council Staff and the Councillors in formulating this	Comment	Comment noted. The Council does not consider it appropriate or lawful to include a policy requirement that seeks to prevent or discourage the submission of so-called "speculative" planning applications. Such a step is very unlikely to withstand examination. Under the Town and Country Planning Act 1990, applicants have the right to submit planning applications on any land, regardless of whether it is allocated

			Local Plan will be rubbished by speculative Developers exploiting this loop hole.		within an adopted Local Plan. National policy, including the NPPF, also sets out the framework within which such applications must be determined, rather than seeking to restrict the ability to submit them. The purpose of the Local Plan, including Policy LP1, is to provide a robust, up-to-date development plan that identifies sufficient land to meet housing needs and to guide decision-making in a consistent and plan-led manner. Where the Council can demonstrate an adequate and deliverable housing land supply, the policies of the Plan will carry full weight in the determination of planning applications, including those on unallocated sites. Accordingly, while the Council cannot prevent speculative applications from being submitted, the preparation of a sound and up-to-date Local Plan is the most effective way to ensure that such proposals are assessed against a clear and robust policy framework.
1163	14441	Cllr Anne and Pierre Oxley [1163]	Petition	Object	The Council notes the concerns raised through the petition and recognises the importance of ensuring that future growth is sustainable and supported by appropriate infrastructure. The Local Plan has been prepared alongside a comprehensive evidence base, including assessments of housing need, infrastructure capacity, environmental constraints, transport impacts, flood risk and sustainability considerations. The level of growth proposed for Walton, Frinton and Kirby reflects the role of these settlements within the District's settlement hierarchy and the requirement to meet identified housing needs through the plan period. With regard to infrastructure, the Council is aware of existing pressures on transport networks, healthcare provision, education facilities, drainage and utilities infrastructure. Ongoing engagement has taken place with relevant infrastructure providers and statutory consultees throughout the plan-making process to ensure that infrastructure requirements are identified and addressed as development comes forward. The Council also acknowledges concerns relating to environmental impacts, biodiversity and the loss of greenfield land. These matters have been carefully considered through the site selection process, Sustainability Appraisal and Habitats Regulations Assessment. In particular, following advice received from statutory bodies such as Natural England, some sites, including a site in Walton were removed from further consideration due to concerns relating to functionally linked land associated with internationally important habitats. This demonstrates that the Council has taken a precautionary approach where significant environmental impacts have been identified. Concerns regarding flood risk and drainage have similarly been assessed through the Strategic Flood Risk Assessment and other technical evidence, with development expected to incorporate appropriate mitigation measures and sustainable drainage solutions where required.

					Whilst growth, including larger strategic allocations such as the one proposed in Kirby will inevitably result in changes to the local environment and character, the Council does not agree that the proposed growth would fundamentally undermine the character of Walton, Frinton and Kirby. Site allocations have been selected following a detailed assessment process and are considered capable of accommodating development whilst respecting the distinct identity and setting of the individual settlements. Having regard to the evidence base and the modifications already made to the Plan in response to environmental and other constraints, including the removal of certain sites following Natural England's advice, the Council considers that the proposed allocations represent an appropriate and sustainable strategy for meeting housing needs. Accordingly, no modification to the Plan is proposed in response to this representation.
1110	3822	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We note the Local Plan's strategic objectives for Housing Delivery and the proposed share of locations around the district; we congratulate Officers for having sifted through the 343 submitted sites by landowners, agents and developers, and having come up with the options proposed. It may well be that some of these sites will not come forward until the very latter stage of the Plan, and we completely understand that land has to allocated to protect the district from unplanned and unsupported proposals of a very speculative nature, therefore we reluctantly support these strategic objectives.	Comment	Noted.
276	3966	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	We recognise that these targets have been determined by central government, rather than the LPA who actually understand local need and constraints, such as being on a peninsula surrounded by coast line and agricultural land responsible for supporting the countries food production. Nevertheless, these targets are unrealistic and do not take into consideration demographics, geographical constraints, or local need.	Comment	The comment is noted. The Council acknowledges and broadly agrees with the concerns raised in this representation. The summarised position set out by the Parish Council is consistent with the Council's previously submitted responses to consultations on the emerging National Planning Policy Framework (NPPF), as well as matters reported to Local Plan Committee throughout 2025 and into 2026, which have consistently highlighted the challenges associated with nationally derived housing targets, particularly in areas with significant geographical and environmental constraints.
258	4282	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	Whilst strongly supporting Garden Communities in the west of district, we accept achieving a five-year land supply requires inclusion of sites deliverable in the short term, the Town Council area is expected to contribute. Although proposed housing figure difficult to reconcile with historic delivery, identified sites locally are considered the least unsuitable option. For SAH2, we're neutral, require a reduced speed limit before development and prioritisation of an extended strategic green gap between Kirby Cross and Kirby-le-Soken. For SAH3, we are neutral but seek policy commitments to highways improvements/public transport contributions. Other sites are proportionate. No alternative sites are proposed.	Comment	Comments noted and the Council will continue to work with all Town and Parish Councils to find the best possible, or least harmful solutions to the challenges faced by the District insofar the growth agenda and new Local Plan is concerned.
262	5209	Great Bromley Parish	There are doubts that the proposed delivery rate of 1,063 homes per year is realistic, calling for robust evidence on phasing, market capacity and	Comment	The Council recognises concerns regarding deliverability and is undertaking further work on transport modelling, infrastructure planning and viability to ensure the strategy is realistic and supported by robust evidence.

		Council (Lizzie Ridout, Clerk) [262]	infrastructure funding before the target of at least 18,071 new homes can be met.		
1652	6721	Wrabness Parish Council (Richard Colley) [1652]	We object to the extraordinary scale of development set out in PolicyLP1, arguing it is disproportionate to recent housing trends and incompatible with the coastal character, and therefore conflicts with the plan's stated housing target and strategic focus.	Object	The Council acknowledges concerns regarding the scale of growth; however, the housing requirement is derived from the Government's mandatory standard method and must be planned for accordingly, with limited scope to reduce overall figures.
254	7118	Elmstead Parish Council (Angela Baxter, Clerk) [254]	The Local Plan appears to favour a "top- down" methodology, prioritizing housing targets over the actual carrying capacity of the district. We find the evidence base to be fragmented rather than cohesive. Specifically: The plan does not adequately account for long term demographic trends and continues to propose development on Grade 1 agricultural land beyond the projected population peak, raising concerns about sustainability and land use viability.	Comment	The Council acknowledges the concerns raised regarding the perceived "top-down" nature of the housing requirement and the reliance placed on national methodology. However, the housing targets within the Local Plan are derived from the Government's mandatory standard method and national policy requirements, which the Council is obliged to follow in order for the Plan to be found sound. There is no scope under the current planning framework to reduce these targets based on local preferences or perceived capacity constraints. In respect of long-term demographic trends, national policy now places primary emphasis on the Government's standard method for calculating housing need rather than locally-derived demographic forecasts. Whilst the Council accepts that this represents a significant uplift compared to previous requirements, it must plan positively to meet this need in order to avoid the risks associated with an unsound or out-of-date Local Plan, including unplanned and speculative development. The Council also recognises concerns relating to the loss of Grade 1 agricultural land. However, there is a very limited supply of previously developed (brownfield) land within the District and, as a result, the majority of development required to meet Government targets will inevitably need to take place on greenfield sites, including higher quality agricultural land. This is a challenge faced across many parts of the country and is not unique to Tendring. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure.
258	13611	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	Whilst strongly supporting the development of Garden Communities in the west of the district it is accepted that to create a 5-year land supply it will be necessary to include sites that can be delivered more quickly. The need for our Town Council area to carry some of that burden is difficult to argue. Whilst reiterating how unacceptable the new housing figure is especially against historical delivery, most of the council would accept that the proposed sites in the Town Council area are perhaps the least bad option.	Comment	In response to the Town Council's concerns, and having regard to the objection from the Essex Wildlife Trust—which identified the development at Land off Arthur Ransome Way, Walton as one of the most ecologically sensitive sites due to its proximity to Hamford Water and its value as functionally linked land—Officers are recommending a change to the Local Plan to delete this allocation. Accordingly, the site will not be carried forward into the Regulation 19 version of the Local Plan.
270	14559	Little Bromley Parish	The proposals fail to meet basic tests of economic and environmental sustainability. Tendring's most deprived coastal communities, particularly Clacton, are being overlooked despite strong evidence supporting	Object	The objection is noted however it does not accurately reflect the Council's spatial strategy or the evidence base underpinning the Local Plan in the context of Clacton and for the following reasons.

		Council (Dawn Sauka, Clerk) 270	housing-led regeneration in these areas. Instead, housing growth is being diverted to speculative new settlements in open countryside, disconnected from existing communities, jobs, services and infrastructure. This represents a missed opportunity to address long-standing poverty, poor health outcomes and economic decline. Environmentally, creating new settlements with no existing services or sustainable transport would lead to car-dependent dormitory towns, which is fundamentally inconsistent with the principles of sustainable development.		1. Focus on Clacton and deprived coastal communities The Plan does not overlook Clacton; rather, it places it at the heart of a *multi-faceted regeneration strategy*. As set out in the Committee Report and supporting evidence, the Council is actively pursuing: • Clacton Town Centre regeneration (public realm, vitality and investment) • Future High Streets Fund programme • Redevelopment of the Clacton Library site • Ongoing delivery at allocated sites including Hartley Gardens, Rouses Farm, and Oakwood Park These initiatives demonstrate a *clear commitment to housing-led and economic regeneration* within Clacton and other urban areas. However, the evidence also shows that regeneration alone cannot meet the District's full housing need or deliver the range of homes required, particularly in viability-constrained coastal locations. The Plan therefore adopts a balanced spatial approach, combining urban regeneration with strategic growth. 2. Need for a diversified spatial strategy The June 2026 Committee Report makes clear that concentrating all growth within existing coastal towns would: • Fail to deliver sufficient housing at the required scale and pace • Exacerbate viability issues in lower-value areas • Limit the ability to secure infrastructure and economic investment Strategic allocations, including new communities, are therefore not "speculative" but plan-led responses to objectively assessed needs, designed to complement—not compete with—investment in Clacton. 3. Sustainability and infrastructure delivery The suggestion that proposed new settlements would be unsustainable or car-dependent is not supported by the Plan's requirements. The strategic sites are designed from the outset to include: • On-site services, schools, and community infrastructure • Integrated movement strategies, including public transport provision and active travel • Phased, masterplanned development to ensure early delivery of facilities This reflects national policy support for plan-led, well-designed new communities as a sustainable form of growth where they are properly masterplanned and infrastructure-led. 4. Addressing deprivation and health inequalities The Council fully recognises the challenges facing Clacton and other coastal areas. However, tackling deprivation requires more than housing numbers alone. The Local Plan works alongside wider Council initiatives—economic

					development, town centre investment, and public sector-led regeneration—to deliver: • Job creation and skills opportunities • Improved town centre offer • Enhanced community infrastructure and health outcomes Strategic growth elsewhere in the District supports this by broadening the economic base, increasing investment, and improving overall viability.
Members of the Public					
972	3565	Mrs Rita Page [972]	I object to land in Victoria Rd, Weeley Heath, being excluded for potential development. 1. Planning already given for one property [redacted]. The space between that and Stardust is unused brush, and could accommodate 8 properties without detrimental effect on properties opposite. 2. Allowing this land for development could secure cash strapped TDC, a £105,000 payment from the new homes bonus, 3.Additional traffic would be negligible compared to the movement of vehicles from staff and public at the busy Anglian Dental Laboratory opposite. 4.Currently overgrown and unproductive, building here would tidy up the area. Thank you.	Object	This objection is noted. The Victoria Road site has been assessed through the Council's Call for Sites process. The assessment identified a number of constraints nearby and around the site, including its surrounding heavily wooded character with potential biodiversity value, the presence of Tree Preservation Orders, and its relationship to the settlement boundary. In addition, there is a discrepancy between the site area submitted and the scale of development proposed, which is considered excessive in this location. While limited infill development may be more in keeping with the character of the area, the identified constraints would remain. The potential for development could be reconsidered in the context of a wider, comprehensive proposal for adjacent land; however, this may raise concerns regarding settlement coalescence. The respondent may continue to promote the site through the Local Plan process or alternatively submit a planning application under the Town and Country Planning Act 1990, where the site's suitability can be assessed against adopted and emerging policies, the NPPF, and other material considerations.
1059	3727	Mr Matthew Sutton [1059]	The housing allocations table confirms 420 dwellings at Land North of Thorpe Road, Kirby Cross (SAH2) and 200 dwellings at Land off Arthur Ransome Way, Walton (SAH3) - a combined 620 new homes in the Frinton, Walton and Kirby Cross cluster in this plan period alone. This is in addition to existing committed development. No equivalent commitment to healthcare or education infrastructure for this area appears anywhere in the plan. Housing supply cannot be considered in isolation from the infrastructure needed to support it. I object to these allocations proceeding without a specific, binding infrastructure commitment for this cluster.	Object	The representation is noted. The Council recognises the importance of aligning planned growth with the timely provision of supporting infrastructure and has consistently emphasised this through Local Plan Committee reports and plan-making processes. The proposed allocation at SAH2 forms part of a balanced spatial strategy informed by evidence and viability considerations, with infrastructure requirements to be addressed through a combination of developer contributions, engagement with infrastructure providers, and the Infrastructure Delivery Plan. Site SAH3 identified by Essex Wildlife Trust as one of the most ecologically sensitive sites due to its proximity to Hamford Water and its value as functionally linked land—will not be carried forward into the Regulation 19 version of the Local Plan. Elsewhere and in respect of other comments made, the Council will continue to work proactively with relevant partners, including NHS and education providers, to ensure infrastructure needs arising from growth in the Frinton, Walton and Kirby Cross cluster are appropriately planned for and delivered alongside development.

1066	3749	Mr Gavin Tuff-Lacey [1066]	Garden villages in and around existing settlements is ill conceived. I support garden villages as a principle to allow the preservation of existing settlements but locations should be chosen away from current settlements and the opportunity to build new infrastructure rather than adapt existing should be taken.	Object	This representation is noted. The Council recognises the principle that larger-scale, masterplanned developments such as garden villages can provide opportunities to deliver new infrastructure alongside growth. However, as set out in Local Plan Committee reports, site selection must balance a range of factors including deliverability, access to existing services, environmental constraints, and the need to achieve sustainable patterns of development. It is also noted that at least one proposed garden village location (Horsley Cross), is relatively well separated from existing settlements. In other instances, some relationship with existing settlements is necessary to support viability, deliverability and ensure access to services. The inclusion of garden village proposals within the Plan is intended to facilitate comprehensive masterplanning, enabling the coordinated provision of new infrastructure, rather than relying solely on existing provision.
1350	4011	Prof Mark Lowdell [1350]	The Horsely Cross Garden Village should not be approved until the impact of the housing development between A133 and A120 has been determined. All local developments adding housing along the A1414 (Thorpe Le Soken to Harwich) and the B1035 (Lawford to Thorpe Le Soken) should be excluded from the local plan since neither of these roads have capacity for increased traffic during constructions or after the houses are occupied.	Object	This representation is noted. As set out in Local Plan Committee reports, the Council is considering the Plan, including the proposed Garden Village at Horsley Cross, in a comprehensive and evidence-led manner. This includes ongoing work in relation to transport modelling, the Infrastructure Delivery Plan, and other supporting evidence, all of which continue to evolve and inform the spatial strategy and site allocations. The Council recognises the importance of understanding cumulative impacts, including on the A133/A120 corridor and the wider highway network. These matters are being assessed holistically, with input from relevant infrastructure providers and statutory consultees, to ensure that the scale and distribution of growth is supported by appropriate mitigation and infrastructure.
1121	4066	Mr John Paxman [1121]	SAH4 Putting another 300 houses would create further issues on an already busy road into and out of Brightlingsea , creating bottle necks at the T junction of Samsons Rd and Church Rd and also Thorrington Cross. I have attached a picture of a regular queue at peak times which was taken at Hollybush Hill. We only have one road into Brightlingsea. It would create more strain on an already busy Doctors, Pharmacy, dentist and schools.	Object	This representation is noted. As reported through the Local Plan Committee process, site allocation SAH4 has been removed from the Plan following further assessment. The revised strategy for Brightlingsea now focuses on a number of smaller-scale sites which collectively will continue to deliver growth, albeit at a reduced level and with a more distributed pattern. This approach reflects the Council's consideration of infrastructure capacity, including local highways and community services, and seeks to better align future development with the town's characteristics and constraints.
581	4103	Mrs Sally Webb [581]	Whilst the Council have done their best to facilitate what is required by Government, their has been no national consultation as to back up these plans realistically with facts. I object to a rural area being filled up with housing, viable farm land should not be built on, it will never revert back to farming. We are a nation that can neither feed ourselves, not take care of ourselves medically, hospital and doctors surgeries bursting by the seams. It is not sustainable.	Object	This representation is noted. As set out in Local Plan Committee reports, the Council is required to plan positively for growth in accordance with national policy, while seeking to balance this with the protection of the District's rural character and best and most versatile agricultural land where possible the Council has sought to avoid best and most versatile agricultural land where possible. Site selection and the overall spatial strategy are informed by a comprehensive and evolving evidence base. The Council recognises the concerns raised regarding infrastructure capacity, including healthcare, transport, and public services. These matters are being considered holistically through ongoing work on the Infrastructure Delivery Plan and transport evidence, alongside engagement with relevant providers. The

					Plan seeks to ensure that new development is supported by appropriate infrastructure and promotes sustainable travel patterns, including improvements to public transport and active travel, where feasible.
969	4270	Mr Scott Gilmour [969]	New homes are welcome. However there are worries over the effectiveness of public transport and active travel in towns without dedicated infrastructure that could result in unsustainable growth in the absence of infrastructure improvements.	Comment	This representation is noted. The Council recognises the importance of ensuring that new development is supported by effective public transport and active travel infrastructure. As set out in Local Plan Committee reports and the emerging Local Plan, many policies already require active travel measures to be incorporated into development proposal, also these matters are being addressed through the evolving evidence base, including transport modelling and the Infrastructure Delivery Plan, to help ensure that growth is delivered in a sustainable manner alongside appropriate infrastructure improvements. The Council acknowledge that policies can be strengthen in the areas mentioned subject to robust evidence and viability testing.
353	4351	Mr Robert Pomery [353]	The allocation of the Station Road site in Thorpe le Soken for up to 60 homes, once earmarked for 200 dwellings, was removed in favour of a less sustainable alternative. The now smaller scheme avoids earlier concerns about landscape and heritage impacts by focusing development on lower land and retaining buffers and open space. The proposals have been informed by a landscape appraisal, and development here would restore lost housing numbers, support the local economy, particularly Lifehouse Hotel & Spa, and poses no transport or highway issues, due to its proximity to the railway station and local services.	Comment	This representation is noted. As set out in the June 2026 Local Plan Committee reports, the Council has carefully reviewed the Station Road site alongside reasonable alternatives, having regard to updated evidence on landscape sensitivity, heritage impacts, settlement pattern, and overall sustainability. While it is acknowledged that the site has previously been promoted at a larger scale, the current Plan strategy reflects a more balanced approach to growth at Thorpe le Soken. The Council's preferred allocations have been selected following a comprehensive and comparative assessment of sites, informed by the evolving evidence base, including local comments and concerns, landscape appraisal work, transport considerations, and infrastructure capacity. At this time the Council has settled for organic further growth in the areas north of the Lifehouse Spa. The spatial strategy seeks to distribute growth appropriately across the District, taking into account cumulative impacts and the need to align development with infrastructure provision, rather than maximising development on individual sites.
1427	4476	Mrs Elspeth Knott [1427]	Any additional housing in Lt Bromley should preserve and reinforce the distinctive rural character of the village. It should not be a mini estate, small scale development of 1or 2 houses would be preferred and should retain open views , hedgerows and sense of spaciousness. Dark skies should be preserved. Affordable homes, eco homes with low environmental impact are preferred. Hedgerows, trees should be retained for wildlife. Increase in traffic has made a need for footpaths. Any development would need mains water and sewage, and should not affect existing well water and septic tanks.	Object	The Council recognises the importance of preserving the distinctive rural character of villages such as Little Bromley, including landscape features, dark skies, and biodiversity assets. The Plan's spatial strategy reflects this by limiting growth in the most constrained villages and directing development to more sustainable and deliverable locations. Matters relating to design, environmental performance, and infrastructure provision would, where relevant, continue to be addressed through planning applications and detailed policy requirements.
1528	13758	Eric Rowley [1528]	Large-scale housing growth in Tendring is unrealistic without first addressing fundamental infrastructure failures. It questions housing need figures, highlighting empty and second homes, and urges prioritising refurbishment or replacement of poor-quality housing. The key principle is "infrastructure before planning," as there are severe pressures on GP services, hospitals, water and sewerage systems, and roads. Evidence from utility experience and national inquiries shows existing systems are already overstretched and unable to support further growth. Without major, long-term investment in infrastructure, additional housing is considered unsustainable and harmful.	Object	This representation is noted. As set out in the June 2026 Local Plan Committee reports, the Council has carefully considered infrastructure capacity alongside the requirement to plan positively for growth in accordance with national policy. It is recognised that there are existing pressures on infrastructure, and the Council has identified a very significant funding gap associated with addressing historic deficits. However, seeking to fully resolve these issues prior to accommodating any further development would not be realistic in practice and would be likely to significantly constrain growth, with wider social and

					economic consequences. Decisions of that nature are more appropriately addressed at a national government and strategic funding level. Ultimately the Council has a duty to positively plan for future growth having regard to evidence and the government new method for calculating housing need. The planning system is designed to secure infrastructure improvements alongside development, particularly through larger-scale, plan-led allocations, but also through smaller schemes via developer contributions and planning obligations. The Council's approach, as reflected in the Plan and supporting Infrastructure Delivery Plan, is to take a balanced and coordinated view—ensuring that growth supports the delivery of new and improved infrastructure, rather than preventing development altogether.
610	13805	Mrs Linda Scott [610]	There are concerns about the robustness of the Local Plan evidence base and the exclusion of a site at Land South of Harwich Road, Little Oakley (CFS848). Housing supply appears significantly over-estimated, relying on stalled permissions and outdated developer correspondence. The site has been acknowledged as available and deliverable, adjacent to existing development, with suitable access, ecological evidence and good connectivity, yet was discounted solely on unsubstantiated visual impact grounds. No detailed assessment, site visit, or mitigation options were considered, despite comparable nearby allocations within the Coastal Protection Belt. The lack of up-to-date evidence and inconsistent boundary review indicates the plan is not positively prepared. There should be reconsideration of the Coastal Protection Belt boundary and allocation of this modest, sustainable site.		This representation is noted. The Council does not agree that the evidence base underpinning the Plan is unsound or that sites have been discounted without appropriate assessment. As set out in June 2026 Local Plan Committee reports, all promoted sites—including Land South of Harwich Road, Little Oakley (CFS848)—have been subject to proportionate and consistent assessment against a range of criteria, informed by an evolving and robust evidence base. The site in question has been visited by Council officers and assessed in detail. This assessment concluded that the land slopes markedly from north to south, making it highly visible and prominent within the wider landscape, particularly from the Backwaters and the Coastal Protection Belt. Development in this location would result in significant landscape harm, appearing visually intrusive, extending into open countryside, and being out of keeping with the scale and character of the settlement. On this basis, it is not considered suitable for allocation at this time. The Council also notes that similar concerns regarding infrastructure, deliverability, and the overall approach to site selection have been addressed elsewhere, including through consideration of cumulative impacts, infrastructure capacity, and the role of the Coastal Protection Belt. The Plan has been prepared having regard to these factors in the round, ensuring that growth is directed to the most appropriate and sustainable locations.
1510	13815	Julie and Trevor Cottee [1510]	Objection to the proposed development as it conflicts with national guidance requiring housing to meet local needs, be infrastructure-led and avoid environmental harm. This scheme would sacrifice approximately 32 hectares of irreplaceable Grade A agricultural land and high-quality green space, contrary to the clear priority for brownfield development and environmental protection. The infrastructure required to support growth—schools, healthcare and roads—has not been delivered from previous developments, despite assurances around developer contributions. Past experience shows such funding does not benefit the village locally. This proposal would therefore damage the environment, place further pressure on already inadequate services, and cannot be justified as sustainable or locally appropriate development.	Comment	This representation is noted. As set out in the Local Plan Committee reports, the Council is required to plan positively for growth in accordance with national policy, balancing the need to meet housing requirements with the protection of environmental assets and the efficient use of land. Site selection has been informed by a comprehensive and evolving evidence base, including assessments of agricultural land quality, environmental constraints, and sustainability considerations. The Council recognises the concerns raised in relation to the loss of higher quality agricultural land and pressure on local infrastructure. These matters have been carefully considered as part of the site assessment process and in shaping the overall spatial strategy. The Council is also mindful of the importance of directing development to appropriate locations, including previously developed land where available, however the supply of such land is insufficient on its own to meet identified needs.

					As outlined in the Plan and supporting Infrastructure Delivery Plan, infrastructure provision is intended to be secured and coordinated alongside development, through a combination of developer contributions and engagement with infrastructure providers. The Council will continue to work with partners to ensure that growth is supported by necessary infrastructure and that impacts are appropriately mitigated.
1515	13929	Peter Gould [1515]	There are concerns regarding the scale of proposed housing growth in this area and the extent to which it is supported by necessary infrastructure improvements. Clacton-on-Sea has relatively limited highway access, and there is a perception that the existing network is already under pressure. Questions are therefore raised about its ability to accommodate both current and proposed development. The level of growth proposed in Weeley, including approximately 900 new homes, also gives rise to concerns about the availability of local employment opportunities, public transport provision—particularly at weekends—and access to healthcare services such as GP practices and dental facilities. While Weeley is valued for its character and environment, there are also localised concerns about certain areas in and around Gutteridge Lane and how further development may affect community cohesion and perceptions of safety. More broadly, the cumulative impact of development proposed across nearby settlements—including Kirby Cross, Kirby-le-Soken, Thorpe and Walton/Frinton—is a concern, particularly in terms of increased traffic and the capacity of the existing road network. It is considered that further measures may be needed to manage traffic flow and speed in order to support sustainable growth.	Comment	This representation is noted. The Council recognises the strength of feeling expressed regarding the scale of proposed growth and the capacity of existing infrastructure. These concerns are reflected in a number of representations received at this stage. As set out in Local Plan Committee reports, the Council is required to meet nationally set housing requirements and has sought to do so in a way that balances growth with local constraints, including transport networks, service provision and environmental considerations. The spatial strategy and site allocations have been informed by an evolving evidence base, including transport modelling and the Infrastructure Delivery Plan, which consider cumulative impacts across the District, including in the Clacton, Weeley and wider Tendring area. The Council acknowledges existing pressures on infrastructure, including highways and healthcare. However, the Plan is intended to support the coordinated delivery of improvements alongside development, including through developer contributions and ongoing engagement with infrastructure providers. As highlighted in previous committee reports, addressing long-standing infrastructure constraints is a complex issue which extends beyond the scope of the Local Plan alone and requires wider strategic investment. The Council also seeks to ensure that development is appropriately distributed to support the vitality of existing communities, while recognising local character and constraints. Matters relating to site-specific impacts, detailed design, and local infrastructure provision would be considered further through the planning application process.
1646	13961	Mr Peter Smith [1646]	Concerns that the Council's guiding principles significantly understate the scale and impact of the Local Plan Review. Extending the plan to 2041, increasing housing targets, and reclassifying settlements represents a major strategic shift requiring stronger justification, evidence and engagement. Reliance on "proportionate" evidence risks development led growth despite known deficiencies in transport, healthcare, wastewater and flood resilience. Smaller settlements may be forced to absorb growth to ease pressure elsewhere, particularly affecting constrained communities such as Harwich. Strategic Green Gaps must be genuinely protected, neighbourhood plans respected, and infrastructure delivered ahead of development, with brownfield land prioritised and growth fairly distributed.	Comment	The Council acknowledges the concerns raised regarding the scale and potential impact of the Local Plan Review. We are under no illusion that extending the plan period to 2043, alongside updated housing requirements and the review of settlement roles, represents a significant exercise which will have tangible implications for communities, infrastructure and the environment. The purpose of the Local Plan Review is precisely to plan positively for these challenges in a coordinated, evidence-led and transparent way, whilst ensuring all impacts are appropriately and proportionately mitigated. However, it is not accepted that the Council's guiding principles understate this scale or represent a departure from a sound and proportionate strategy. As set out in the June Local Plan Committee reports, the approach remains firmly grounded in the established settlement hierarchy, directing the majority of growth to the most sustainable locations where access to services,

					employment opportunities and infrastructure is greatest. The Council is not departing from this spatial strategy; rather, it is reinforcing it and where required, updating it in light of the latest evidence to ensure it remains effective and justified over the extended plan period. For example, the evidence base continues to demonstrate that the largest and most sustainable settlements are best placed to accommodate strategic levels of growth, with smaller settlements assigned more limited, proportionate levels of development commensurate with their role, function and capacity. This is not a strategy of dispersal to constrained communities, but one of managed and balanced distribution, ensuring that no single area is overburdened all the while whilst taking into account the role, hierarchy, location and support services available in settlements. The Council also recognises longstanding and well-documented infrastructure deficits and constraints, particularly in relation to transport networks, healthcare provision, wastewater capacity and flood resilience. These issues are not new, and the Local Plan Review explicitly seeks to address them through updated evidence, infrastructure planning and engagement with key infrastructure providers. The Council's position, as reflected in the Committee reports, is that development must be, as far as possible and evidenced, aligned with infrastructure delivery, and where necessary, viable and evidenced, appropriately phased to ensure impacts are mitigated. Concerns around "development-led growth" are acknowledged but for these reasons, not accepted. The Council's strategy is evidence-led, with the proportionate evidence base reflecting national policy requirements and the appropriate level of detail for plan-making at this stage. This includes infrastructure assessments, sustainability appraisal work and ongoing engagement with statutory consultees and our communities. The Council will continue to strengthen this evidence as the plan progresses.
1177	14041	Colin Grant [1177]	The proposed site is too far out from the town. A stretch alongside the Manor Estate (Ginling's Farm) is nearer and less obtrusive. The town's infrastructure hasn't been improved in 15-20 years. E.G There is a shortage of doctors. Each Dr has 2008 patients the worst in the country according to the E.C.S. March 6th. (SITE CANNOT BE IDENTIFIED, PLEASE SEE ATTACHMENT)	Object	The representation is noted. The Council recognises concerns regarding existing pressures on local infrastructure, including healthcare provision. However, it should be acknowledged that the Local Plan is required to plan positively for the District's identified development needs and to ensure that future growth is supported by appropriate infrastructure. The Plan has been prepared alongside an Infrastructure Delivery Plan and ongoing engagement with infrastructure providers, including NHS bodies, Essex County Council and utility providers, to identify the infrastructure required to support planned development. The Local Plan cannot, in itself, remedy all existing infrastructure deficiencies that may have arisen over time. However, the planned growth strategy provides opportunities to secure investment in infrastructure through developer contributions and the coordinated planning of larger strategic allocations. Through the allocation of sites and the implementation of planning obligations and other funding mechanisms, new development can contribute towards improvements and additional capacity in infrastructure and services where

					such needs arise as a direct consequence of growth. Without planned development, opportunities to secure such investment may be more limited. The Council is therefore satisfied that infrastructure considerations have been appropriately addressed through the plan-making process and does not consider that the matters raised warrant a modification to the Local Plan.
1637	14070	Rosemary Lumb [1637]	Lack of infrastructure - too much traffic on main roads - unable to cope. Country lanes being used as cut throughs - safety issues. The traffic on A133 is already too heavy - very difficult to access to road from Tendring, Little Bentley, or Great Bentley. Any more and it would be at a standstill. I am concerned that the country lanes will be used as cut - throughs, from Clacton and Weeley en route to Manningtree Station. Crow Lane and Crown Lane (both in Tendring) are not suitable for large amounts of traffic or heavy vehicles. They are both being eroded and both very twisty - already a safety hazard with bad bends. More generally - there is a shortage of schools and doctors surgeries. They cannot attract new staff to this area. There is no point building more if the staff are not available.	Comment	The Council acknowledges the concerns raised in relation to infrastructure capacity, traffic congestion and highway safety, and recognises that these are significant and longstanding issues within parts of the District. The Council is under no illusion that additional growth, if not carefully planned and managed, has the potential to place further pressure on already constrained networks and services. However, as set out in the June Local Plan Committee reports, the purpose of the Local Plan Review is to respond positively and proactively to these challenges through a coordinated, evidence-led strategy, rather than to avoid them. The Council's approach is not one of unmitigated growth, but of planning for sustainable development aligned with infrastructure provision. In respect of highway impacts, including on the A133 and surrounding rural road network, the Council is fully aware of existing congestion issues and the difficulties experienced at key junctions and access points, including from settlements such as Tendring, Little Bentley and Great Bentley. The Local Plan evidence base, including transport assessments and engagement with the Highway Authority, is being updated to ensure that the cumulative impacts of growth are properly understood and mitigated. This includes consideration of route capacity, junction improvements, and traffic management measures. Concerns regarding the use of rural lanes such as Crow Lane and Crown Lane as informal "cut-through" routes are also recognised. The Council accepts that such roads are inherently constrained in their nature, with limited width, alignment and safety features. As reflected in previous responses and Committee discussions, the strategy is not to direct significant volumes of traffic onto these routes. Where evidence identifies potential risks of rat-running or displacement traffic, appropriate mitigation – such as traffic calming, restrictions, or network management measures – will be explored in partnership with the Highway Authority. More broadly, the spatial strategy continues to prioritise growth in the most sustainable locations, where access to higher-order roads, public transport and services is greatest. This reduces reliance on rural road networks and helps minimise inappropriate traffic movements through smaller settlements and the countryside. The Council is not seeking to place disproportionate growth in less sustainable or constrained areas; rather, development is being distributed in a way that reflects settlement role, function and capacity, consistent with the established hierarchy. With regard to concerns about healthcare, education and the ability to attract staff, the Council acknowledges that infrastructure provision is not solely a matter of physical capacity, but also workforce availability, which is a national

					challenge affecting many areas. While the Council does not directly control NHS or education staffing, it is actively engaging with relevant providers through the plan-making process to ensure that future needs are clearly identified and planned for. The Local Plan Review is supported by infrastructure planning work which identifies existing deficiencies and future requirements, and seeks to secure necessary improvements
1253	14072	Esther Killineton [1253]	Building too many houses on farmers land. Overcrowding the area. Drains not able to cope with the situation. We are finding it will soon just be one village from Weeley to Walton-on-Naze. We can't get seen by doctors. Dentists have not been taking new patients for years now.	Object	The Council acknowledges the concerns raised regarding the scale of development, infrastructure capacity and access to services. It is recognised that growth will have impacts, and the Council is under no illusion about the pressures this may place on communities if not properly managed. However, housing requirements are set nationally and the Council's role, as set out in the June Local Plan Committee reports, is to plan for this growth in a proportionate and sustainable way. The strategy continues to follow the established settlement hierarchy, directing development to the most suitable locations while avoiding disproportionate impacts on smaller or constrained areas. Concerns about coalescence between settlements are noted. The Council remains committed to maintaining settlement identity through appropriate planning tools, including Strategic Green Gaps where justified. The use of agricultural land is, in part, unavoidable given limited brownfield availability, but this is being managed carefully through site selection and evidence. Similarly, known issues with drainage, healthcare and other infrastructure are recognised. The Local Plan process includes ongoing engagement with providers to ensure infrastructure needs are identified and addressed alongside growth. Overall, the approach is not one of uncontrolled development, but of planned and evidence-led growth, distributed fairly and aligned with infrastructure capacity as far as possible.
1495	14178	Martine Ward [1495]	Tendring is facing a combination of major developments that are not occurring in isolation. Some projects have already begun, others are due to start shortly, and several have been temporarily delayed only because public concern has reached an unprecedented level. Despite these pauses, all of these schemes will ultimately progress, and their impacts will overlap. This means the district will experience multiple pressures at the same time rather than in manageable stages. Housing growth, commercial expansion, road congestion, mineral extraction, and national infrastructure projects — including the installation of high-voltage pylons and new substations — will converge within the same period. The decision to pursue an onshore pylon route, despite offshore alternatives being less destructive and more cost-effective, adds further long-term strain to the landscape and local communities.	Comment	The Council recognises that a number of development proposals, infrastructure projects and other activities may come forward within Tendring during the plan period and that local communities may have concerns regarding their combined effects. The preparation of the Local Plan has been informed by a comprehensive evidence base, including transport, infrastructure, environmental, sustainability and habitat assessments. The potential cumulative effects of planned growth have been considered through this process, including through the Sustainability Appraisal, Habitats Regulations Assessment, Infrastructure Delivery Plan and other supporting technical evidence. The Council is satisfied that the strategy set out in the Local Plan has been developed with due regard to the potential cumulative impacts of growth and infrastructure requirements across the District.

			The Neighbourhood Plan must recognise that these pressures are cumulative. Treating each project as if it exists independently ignores the real-world experience of residents, who will face the combined effects of construction traffic, environmental disruption, noise, loss of rural character, and increased safety risks. A realistic Plan must address the total impact of these overlapping developments rather than assessing them in isolation. The Neighbourhood Plan Review relies on housing and growth figures that do not accurately reflect Tendring District's true requirements. During recent discussions, the Minister confirmed that several of the numbers being used were national-level projections, not figures that apply to Tendring District Council. Despite this clarification, TDC did not challenge the incorrect data or request district-specific adjustments. As a result, the district has been pushed to plan for levels of development that exceed its genuine local need. This failure to argue the figures has forced Tendring to allocate more land for housing than necessary, leading to avoidable loss of countryside, increased pressure on rural communities, and further strain on already overstretched infrastructure. The use of inflated or misapplied numbers has contributed directly to overbuilding, environmental degradation, and the erosion of rural character. The Neighbourhood Plan must be based on accurate, locally relevant evidence, not national projections that distort the district's true needs. Without correcting these figures, the Plan risks embedding long-term policies that continue to overburden the district and accelerate unnecessary loss of greenfield land.		In relation to nationally significant infrastructure projects, mineral development and other proposals promoted through separate statutory regimes, the Council also strongly acknowledges that these may have implications for local communities. However, such projects are subject to their own assessment, consultation and decision-making processes and cannot be assumed to proceed in the form currently proposed. The Local Plan can only reasonably be prepared on the basis of the available evidence and adopted policy requirements at the time of plan preparation. The Council does not agree with the assertion that housing requirements within the Plan are based upon incorrect or inflated figures. Policy LP1 has been prepared having regard to national planning policy and guidance, the standard method for assessing housing need, the current and relevant demographic and economic evidence, and the Council's wider evidence base. The housing requirement and growth strategy have been considered through successive stages of plan preparation and refinement, including the review of evidence presented to the Local Plan Committee in June 2026. Furthermore, since the Regulation 18 consultation, the Council has refined its growth strategy and site allocations in response to evidence and consultation responses. This has included the removal of a number of proposed allocations where significant constraints were identified, including sites affected by concerns raised by Natural England relating to functionally linked land associated with internationally important habitats. This demonstrates that the Council has not sought to allocate land unnecessarily, but has instead applied a robust and evidence-led approach to identifying the most appropriate and deliverable sites. The Council is therefore satisfied that Policy LP1 is supported by an appropriate and proportionate evidence base, reflects objectively assessed housing needs in accordance with national policy, and provides a balanced strategy for accommodating growth whilst taking account of environmental, infrastructure and community considerations. Accordingly, no modification to the Plan is proposed in response to this representation.
1498	14189	Lee Smith [1498]	The proposals fail to meet basic tests of economic and environmental sustainability. Tendring's most deprived coastal communities, particularly Clacton, are being overlooked despite strong evidence supporting housing-led regeneration in these areas. Instead, housing growth is being diverted to speculative new settlements in open countryside, disconnected from existing communities, jobs, services and infrastructure. This represents a missed opportunity to address long-standing poverty, poor health outcomes and economic decline. Environmentally, creating new settlements with no existing services or sustainable transport would lead to car-dependent dormitory towns, which is fundamentally inconsistent with the principles of sustainable development.	Object	The objection is noted however it does not accurately reflect the Council's spatial strategy or the evidence base underpinning the Local Plan in the context of Clacton and for the following reasons. 1. Focus on Clacton and deprived coastal communities The Plan does not overlook Clacton; rather, it places it at the heart of a *multi-faceted regeneration strategy*. As set out in the Committee Report and supporting evidence, the Council is actively pursuing: • Clacton Town Centre regeneration (public realm, vitality and investment) • Future High Streets Fund programme • Redevelopment of the Clacton Library site

					• Ongoing delivery at allocated sites including Hartley Gardens, Rouses Farm, and Oakwood Park These initiatives demonstrate a *clear commitment to housing-led and economic regeneration* within Clacton and other urban areas. However, the evidence also shows that regeneration alone cannot meet the District's full housing need or deliver the range of homes required, particularly in viability-constrained coastal locations. The Plan therefore adopts a balanced spatial approach, combining urban regeneration with strategic growth. 2. Need for a diversified spatial strategy The June 2026 Committee Report makes clear that concentrating all growth within existing coastal towns would: • Fail to deliver sufficient housing at the required scale and pace • Exacerbate viability issues in lower-value areas • Limit the ability to secure infrastructure and economic investment Strategic allocations, including new communities, are therefore not "speculative" but plan-led responses to objectively assessed needs, designed to complement—not compete with—investment in Clacton. 3. Sustainability and infrastructure delivery The suggestion that proposed new settlements would be unsustainable or car-dependent is not supported by the Plan's requirements. The strategic sites are designed from the outset to include: • On-site services, schools, and community infrastructure • Integrated movement strategies, including public transport provision and active travel • Phased, masterplanned development to ensure early delivery of facilities This reflects national policy support for plan-led, well-designed new communities as a sustainable form of growth where they are properly masterplanned and infrastructure-led. 4. Addressing deprivation and health inequalities The Council fully recognises the challenges facing Clacton and other coastal areas. However, tackling deprivation requires more than housing numbers alone. The Local Plan works alongside wider Council initiatives—economic development, town centre investment, and public sector-led regeneration—to deliver: • Job creation and skills opportunities • Improved town centre offer • Enhanced community infrastructure and health outcomes Strategic growth elsewhere in the District supports this by broadening the economic base, increasing investment, and improving overall viability.

1690	14273	Mr G Cocelli [1690]	This representation is submitted in support of the promotion of the former Clacton Covered Market site through the Regulation 18 consultation on the Tendring District Local Plan Review 2025–2042 and Beyond In summary, this is the sort of site that should be positively considered through the Regulation 18 Plan: a central and previously developed site within the regeneration area and town centre, with in-principle support for mixed-use redevelopment already indicated through pre-application engagement, and with clear public benefits capable of being secured through a heritage-led, criteria based allocation.	Comment	The Council recognises that the site occupies a previously developed location within Clacton town centre. It appears as though the site was not previously promoted through the call for sites exercises however the absence of a specific allocation does not prevent a formal planning application being submitted via the Development Management process. The Council would emphasise that the Local Plan process and the determination of planning applications are separate statutory functions and any such proposal would be considered through the development management process on its own merits, having regard to the development plan in force at the time, national planning policy, and all other material considerations, including matters relating to heritage, design, regeneration, viability, land use mix and site-specific constraints and opportunities. Accordingly, the Council does not consider that the representation provides sufficient evidence to justify the allocation of the site through the Local Plan Review. For the avoidance of doubt, this conclusion is made solely in the context of the preparation of the Local Plan and is without prejudice to the future consideration of any planning application or development proposal relating to the site. The Council therefore does not propose any modification to the Plan in response to this representation.
1716	14322	M and S Adams [1716]	This representation is submitted to promote Land south east of Comarques, Thorpe-le-Soken (the “Site”). It seeks the allocation of the Site through the Tendring District Local Plan Review (Preferred Options) as a small, heritage-led residential site capable of delivering approximately 10-15 high-quality new homes alongside enhanced setting to the High Street. The promoted site is located immediately to the north-west of Thorpe-le-Soken High Street, adjacent to the built form of the settlement and close to day-to-day services, including public transport stops and village facilities. It lies within the Thorpe-le-Soken Conservation Area and approximately 150m south-east of a Grade II* listed house (“Comarques”). The Site is currently unallocated and presents as an enclosed and overgrown parcel, with boundary fencing creating an inactive High Street edge. The key plan-making benefit is that the Site can deliver a net enhancement to the High Street setting and Conservation Area townscape by transforming an underused, visually closed parcel into a positive and accessible village-edge. This would be achieved by removing/reducing visually restrictive fencing where practicable, introducing a sensitively designed group of dwellings that	Comment	The Council can confirm that this site was submitted through the Call for Sites process and was subject to formal assessment as part of the preparation of the Local Plan Review. The site was considered against the Council's site assessment methodology, including its relationship to the settlement, heritage impacts, environmental constraints, landscape considerations and overall suitability for development. Whilst the Council recognises the potential benefits identified by the representation, the assessment concluded that the site was not suitable for allocation. In particular, due to concerns regarding the impact of development on the character and appearance of the Conservation Area and the setting of other nearby heritage assets. In addition, the site's development would result in the unacceptable loss of green infrastructure and would likely necessitate a form and density of development that would appear overly cramped and out of keeping with the site's historic village-edge context. Having regard to these considerations, together with identified constraints in Thorpe-le-Soken and the availability of more appropriate and sustainable sites within this particular settlement, the Council does not consider that the allocation of the site is justified. The Council is therefore not persuaded that the proposed allocation would represent a more appropriate approach to accommodating growth than the strategy set out in the emerging Plan. Accordingly, no modification to the Plan is proposed in response to this representation.

			respond to local character and improved landscaping. The resulting improved streetscape and green setting would support enjoyment of the High Street for residents and visitors, contribute to the appreciation of heritage character, and provide modest economic benefits through increased attractiveness and footfall. The draft Plan already anticipates strategic-scale growth at Thorpe-le-Soken, including a 150-dwelling allocation further to the north-west of Comarques. This representation does not seek to undermine that allocation. Rather, the Site is promoted as a complementary small-scale allocation (or alternative option) that better reflects the historic evolution of rural and historic villages, incremental growth closely related to the settlement nucleus, and which can diversify delivery by adding a modest, deliverable site in a highly accessible location. The requested change is therefore as follows: • Allocate Land south east of Comarques for residential development of circa 10 15 dwellings, alongside delivery of enhancement to the setting of the High Street; • Make any necessary amendment to the Policies Map and/or Settlement Development Boundary to ensure the allocation is plan-led and consistent with the Plan's spatial strategy; and • Include a criteria-based site policy requiring: (i) heritage-led design that preserves or enhances the Conservation Area and protects the setting of nearby designated heritage assets; (ii) safe and suitable access onto the High Street; (iii) high quality design and layout; and (iv) delivery and long-term management of biodiversity. These changes would ensure the Plan is more effective and more justified in its approach to growth at Thorpe-le-Soken, by securing a deliverable, village-edge opportunity that provides clear public benefits and strengthens the quality and function of the High Street in a manner consistent with the Conservation Area context.		
1503	14323	Mr Carl Richardson [1503]	The Local Plan accords with the requirement to plan positively for the levels of housing need identified by the new standard methodology introduced alongside the current NPPF (2024) and makes positive provision to address this increased housing requirement through identification of site allocations alongside other sources of supply.	Support	Comment noted.
1693	14407	Mr J Sillet [1693]	This representation is submitted in support of the promotion of Land West of Kirby	Comment	The Council acknowledges the promotion of Land West of Kirby-le-Soken as a residential allocation.

			le-Soken through the Regulation 18 Local Plan consultation on behalf of the landowner, Mr J Sillet. The Site is promoted as a single allocation opportunity on the western side of Kirby-le-Soken and is advanced for a residential allocation of around 20 dwellings. The Site lies in a sensitive edge-of-village location and is currently washed over by the Coastal Protection Belt. The Council's earlier evidence has identified matters relating to access, the relationship with the Conservation Area, flood affected outer edges, and the risk of poorly related settlement form if the land is not planned comprehensively. These are matters that require the developable area to be defined carefully and supported by strong design controls. They do not justify omission of the Site in principle. The wider planning context also supports a positive reassessment. The Council is already proposing additional allocations within Kirby-le-Soken and a strategic growth site at Kirby Cross Allocating Land West of Kirby-le-Soken would provide a proportionate and deliverable addition to that growth pattern, improve choice and resilience in the housing land portfolio, and secure a coordinated western edge to the village rather than leaving the land to be considered in a piecemeal way. Requested change: • Allocate Land West of Kirby-le-Soken for residential development for around 20 dwellings as a single comprehensive allocation; • Amend the Policies Map to remove the allocation land from the Coastal Protection Belt and include the Site within the Settlement Development Boundary as a logical and defensible extension to the village; • Insert a criteria-based policy requiring landscape-led and heritage-aware design, safe and suitable access, flood-responsive layout, retention and reinforcement of important landscape features, biodiversity net gain, and policy-led infrastructure provision; and • Delete the draft allocations of MSA18 and MSA17		The site was submitted through the Call for Sites process and was subject to assessment against the Council's site selection methodology. Following that assessment, the site was not considered suitable for allocation. The site lies well outside the existing Settlement Development Boundary and is located a considerable distance from the main built core of Kirby-le-Soken. It comprises predominantly open and undeveloped land that contributes positively to the rural setting of the village and affords important views across the surrounding countryside. The Council concluded that development in this location would represent an unjustified extension of the settlement into open countryside and would risk fragmenting the existing settlement pattern in a harmful manner. In relation to the request to remove the site from the Coastal Protection Belt and include it within the Settlement Development Boundary, the Council does not consider there to be any overriding justification for such amendments. The Coastal Protection Belt in this location continues to perform an important policy function in maintaining the open character of the coast and protecting the distinction between settlements. The Council therefore considers its retention to be justified. With regard to the suggested criteria-based policy requirements, the Council notes that matters relating to design quality, heritage impacts, biodiversity enhancement, flood risk, infrastructure provision, landscape protection and access are already addressed through the strategic and development management policies contained within the Local Plan. As such, the Council does not consider that the proposed allocation-specific policy is necessary. Regarding the request to delete allocations MSA18 and MSA17, the Council notes that MSA18 has already been removed from the Local Plan following further assessment work and consideration by the Local Plan Committee in June 2026. This decision was taken having regard to site-specific constraints and updated evidence rather than as a consequence of the representation the subject of this reply, or promotion of the land west of Kirby-le-Soken. In respect of MSA17, the Council remains satisfied that the allocation represents a more appropriate location for development when assessed against the agreed site selection criteria. Furthermore, the majority of the allocated site does not lie within the Coastal Protection Belt and its allocation is consistent with the Plan's overall spatial strategy. For these reasons, the Council does not consider that the allocation of Land West of Kirby-le-Soken is justified and no modification to the Plan is proposed in response to this representation.
1691	14411	Mr S Spencer [1691]	These representations support the inclusion of Land at The Paddocks, Thorpe-le Soken, as a residential allocation for a small scheme of around 10 dwellings. The Site sits to the rear of Paddock Drive, immediately adjacent to recent residential development, and has already been the subject of an outline	Comment	Comments are noted, however this site is outside of the existing settlement development boundary. Despite the recently approved development to the West, further development here would be insensitive to the surrounding area given the significant distance to the core of the settlement.

			planning application supported by highways, ecology and drainage evidence. The 2023 application was withdrawn in 2024 following officer advice on the settlement boundary position rather than because of any overriding technical objection. The central concern with the current evidence base is that the Site's SHLAA assessment appears to overstate remoteness, countryside harm and access difficulty, despite other evidence describing the Site as adjacent to the settlement, accessible to services by foot and bus, and capable of taking access from the existing Paddock Drive junction. The adjoining Paddock Drive development, which was allowed on appeal and has now been built out, materially changes the context and demonstrates that this part of Thorpe Green is capable of accommodating modest residential growth in a sustainable form. The requested change is therefore straightforward. The Council should modify the Plan so that Land at The Paddocks is allocated for residential development, with policy wording proportionate to its scale and with suitable criteria covering access, landscape, drainage, ecology, archaeology and design. If the Council is not minded to allocate the Site at this stage, the minimum necessary change would be to amend the settlement development boundary so that the Site can be considered as part of the built edge of Thorpe Green / Thorpe-le-Soken through the development management process.		
428	14428	Mr N Neale [428]	This representation is submitted in support of the promotion of Land South of Church Hill, Ramsey ("the Site") through the Regulation 18 Local Plan consultation on behalf of the landowner. See attached doc for full details.	Comment	The site lies within an established Green Gap designation. Members have consistently emphasised the importance of safeguarding existing Green Gaps, recognising their role in maintaining the character and separation of settlements. In support of this commitment, the Council has commissioned an updated Green Gap Study, the findings of which will be reported to Members in due course and will help inform future planning considerations.
1738	14453	Mr D Akers [1738]	This representation is submitted to promote Land west of Sladbury's Lane (north west of Keswick Avenue), Holland-on-Sea / Greater Clacton (c.1.6ha) for allocation within the emerging Local Plan, capable of delivering circa 30 dwellings within the early plan period (0–5 years). The site is under landowner control, with developer interest, is of a modest scale, and presents a realistic, deliverable opportunity to support housing delivery in one of the District's most sustainable settlement areas. The promoted site is a contained settlement-edge parcel which is physically and	Comment	Comment noted. The site referenced in the Summary of Representation column relates to planning application 25/01011/OUT, which was allowed on appeal earlier this month for up to 30 dwellings. As the site now benefits from planning permission, it is considered to have been appropriately assessed through the planning process and there is no requirement to consider it further as part of the current exercise.

			visually influenced by the existing built form of Holland-on-Sea and the wider Clacton urban area. The Council's own assessment of the recent outline application accepted that the proposal was accessible and connected and that the scheme could be technically addressed through normal planning controls, with refusal turning principally on "in principle" policy conflicts linked to the Settlement Development Boundary and the Strategic Green Gap designation. (For further details see attached document)		

Policy LP1: Housing Supply

Summary of Representations

Representations submitted for Policy LP1 include a mix of support, objections, and comments and have been submitted by a variety of stakeholders. Representations have not identified a need for a fundamental change to the overall housing strategy set out in Policy LP1. However, they have highlighted the need for updates to the housing requirement, housing trajectory, site allocations, infrastructure evidence and supporting text.

In response to the representations received, changes have been made to the Regulation19 version of Policy LP1, the housing trajectory, and Table LP1. The plan period has been updated to 2026-2043, and the housing requirement has therefore been revised to 18,334 (1,078 dwellings per annum). Following Committee resolutions, MSA19 (Little Bentley – 12 dwellings), MSA20 (Little Bromley – reduced from 17 to 10 dwellings) and MSA22 (Tendring Heath – 10 dwellings) have been retained within the housing supply. However, MSA27 (Abbey Bottom Farm, Wix – 20 dwellings) SAH3 (Walton – 200 dwellings), SAH4 (Brightlingsea – 300 dwellings) and SAH10 (Thorpe-le-Soken – 150 dwellings) have been deleted. Further to this, SAH11 (Land North of Lifehouse Spa & Hotel, Thorpe-le-Soken) has been reduced from 110 dwellings to 70 dwellings, MSA4 (Crisp Maltings, Mistley) has been reduced from 80 dwellings to 50 dwellings, and MSA8 (Land adjacent Village Hall, Beaumont) has been reduced from 20 dwellings to 12 dwellings. SAH2 (Land North of Thorpe Road, Kirby Cross) has increased capacity from 420 dwellings to 450 dwellings, and MSA6 (Land at Pannell Place, Brightlingsea) has increased capacity from 10 dwellings to 20 dwellings. New allocations have also been introduced in the Regulation 19 version of the Local Plan. Added within Table LP1 are MSA33 (Former Wellhouse Site, Brightlingsea – 60 dwellings), MSA34 (Vicarage Field, Brightlingsea – 30 dwellings), MSA35 (Land North of Robinson Road, Brightlingsea – 25), MSA36 (Land North of Wix Road, Bradfield – 25 dwellings), and MSA37 (Paddock Site South of Bradfield Playing Field – 30 dwellings). The anticipated contribution from SAMU8 and Hare Green Garden Village has been reduced from 1,700 dwellings to 1,450 dwellings within the plan period, and, equally, the anticipated contribution from SAMU9 Horsley Cross Garden Village has been reduced from 1,700 dwellings to 1,450 dwellings within the plan period. Housing delivery assumption, lead-in times and build-out rates have been reviewed and refined within Policy LP1, particularly for strategic allocations and Garden Villages, to ensure the housing trajectory remains realistic, robust, and deliverable.

Separate to the revisions to Table LP1 and housing allocations, the supporting text has been updated to reflect the ongoing work on transport modelling, infrastructure planning, flood risk, habitat regulations, viability, and heritage evidence. Text has also been strengthened with regard to infrastructure delivery, sustainable transport, biodiversity net gain, green infrastructure and specialist housing needs, where supported by the updated evidence base. Overall, the proposed changes represent a refinement of Policy LP1 and its supporting evidence rather than a fundamental change to the housing strategy, ensuring the Regulation 19 Plan is supported by an updated and more robust housing supply position whilst continuing to meet the Government's housing requirement.

Policy LP2: Housing Choice

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
349	4299	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	The ICB is in support but would like to bring to the attention of TDC the work that West Yorkshire Combined Authority has done in creating a guidance document on dementia ready housing. The number of people living with dementia in the UK is expected to double between 2025 and 2050 to almost 2 million. This is a significant challenge for the NHS and is forecast to cost the UK economy £42bn in 2024, rising to £90bn in 2040 There is only enough specialist housing to accommodate 5% of the over-65 population so designing and adapting homes to be dementia-ready makes practical and economic sense. Most people want to stay at home as they age and staying in a community which is familiar and comfortable is beneficial for health and wellbeing.	Comment	The Council welcomes the ICB's support for Strategic Policy LP2 and appreciates the helpful reference to the work undertaken by the West Yorkshire Combined Authority in preparing guidance on dementia-ready housing. The Council fully acknowledges the importance of ensuring that new housing is designed to respond to the needs of an ageing population, including those living with dementia, and recognises the wider health, wellbeing and economic benefits associated with enabling people to remain in their own homes and communities for as long as possible. The points raised regarding the growing prevalence of dementia and the current shortfall in specialist accommodation are well noted and provide a clear rationale for considering how mainstream housing design can better respond to these challenges. The Council will review the guidance referenced as part of the ongoing development of the Local Plan and will consider how the principles of dementia-friendly design could be appropriately reflected within Policy LP2 or supporting text. Any such changes will need to be proportionate, viable, evidence-based, and aligned with local circumstances and needs across North Essex. In principle, the Council is supportive of measures that improve the inclusivity and adaptability of new homes and will seek to incorporate relevant and justified approaches where these can be demonstrated to support effective and deliverable policy outcomes.
1335	4367	Affinity Water Ltd [1335]	The proposed developments by Affinity identified as medium sized allocations in Clacton and Manningtree, would provide a mix of house types, sizes and tenures including market and affordable housing. The proposed developments would contribute towards the aim of Policy LP2 to deliver a mix of housing. Policy LP2 is supported.	Support	Comment noted.
823	13526	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Comments / Change Required: • Policy LP2 should expand its definition of Specialist and Supported Housing (SSH) to recognise the full range of specialist and supported housing types and population groups identified in ECC's Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025). • The SSHANA (2025) identifies the need for a broad mix of housing types and tenures, to meet the differing supported and specialist	Comment	The Council has incorporated appropriate reference to the SSHANA (2025) within Policy LP2 to highlight the need for specialist and supported housing across a range of tenures, including affordable provision where justified by evidence. It is also worth noting that Policy LP10 already provides a comprehensive and locally specific framework for the delivery of care homes, extra-care housing, and other forms of specialist accommodation in sustainable locations, covering a wide spectrum of needs including residential care, supported living, and housing for those with care requirements.

			housing and accommodation requirements across the different population groups. Policy LP2 should reflect this by ensuring that housing mix expectations include a clear requirement for specialist and supported homes across all relevant tenures, including affordable provision where there is evidenced need. (see alternative wording in full document)		Together, these policies will ensure that the identified need for specialist and supported housing is appropriately recognised and addressed.
148	14467	Environment Agency (Environment Agency) [148]	The Council is advised to avoid bungalow development in areas of flood risk due to lack of safe refuge above ground level, their appeal to vulnerable residents, and the potential burden on emergency services if evacuation is required. Bungalows may be acceptable in low-risk areas where access and egress are also safe from flooding. Additional policy text is recommended to include a presumption against single-storey development in areas identified by the SFRA as being at risk from surface water, rivers or the sea, aligning with Strategic Policy PPL1.	Comment	The Council notes the concerns raised regarding the suitability of bungalow development in areas at risk of flooding, particularly in relation to the safety of vulnerable occupants and the potential implications for emergency response. The Council does not propose to allocate new housing, including bungalows, in areas identified as being at risk of flooding. All development proposals will be assessed in accordance with national policy, including the application of the Sequential Test (and Exception Test where required), to ensure that development is directed to areas of lowest flood risk. Where development is considered in areas of residual risk, site-specific design and layout – including considerations of safe access, egress, and refuge – will be addressed through the planning application process and in line with Strategic Policy PPL1 and the findings of the Strategic Flood Risk Assessment.
Businesses, Landowners and Developers					
1215	3908	Pigeon [1215]	Policy LP2 is supported.	Support	Noted.
1336	4327	Pigeon [1336]	Pigeon has promoted the strategic housing allocation at Site Ref. SAH6 in Alresford. The proposed development would contribute towards the aim of Policy LP2 to deliver a mix of housing. Policy LP2 is supported.	Support	Noted.
136	4416	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	It is essential to provide an appropriate mix of house types and tenures based on an up-to-date evidence base to satisfy both socio-economic and demographic needs and market choice.	Support	Noted.
1422	4423	M Scott Properties Ltd (Scott Properties) [1422]	We support this policy which sets out development comprising 10 or more dwellings, the Council will require a mix of dwelling sizes, types and tenures that aligns with the housing needs identified in the most recent Strategic Housing Market Assessment. The policy sets out this applies unless site-specific policies prescribe an alternative mix, or where there is robust viability evidence. This approach is considered justified and effective, and in accordance with paragraph 36 of the NPPF 2024 and is consistent with the direction of travel in the December 2025 draft NPPF which seeks to deliver an appropriate mix of homes.	Support	Comment noted.

1439	13877	Catesby Estates [1439]	Catesby broadly support Draft Strategic Policy LP2, which promotes a mix of housing types, sizes and tenures in line with the SHMA. They welcome the policy's recognition that site-specific circumstances or robust evidence may justify alternative mixes, as this provides necessary flexibility in accordance with national policy. The site is capable of contributing to this objective by delivering an appropriate range of homes, including family housing and accommodation for older or disabled residents. Catesby emphasise the importance of maintaining flexibility so developers can respond to local evidence, site characteristics, and changing demographic and market conditions, ensuring the policy remains deliverable and effective. While supportive in principle, concerns are raised that the draft wording is overly long, repetitive, and lacks clarity. In particular, it is unclear how the policy applies across different development scales, and why flexibility linked to robust evidence is not explicitly extended to schemes below 10 dwellings. Greater clarity is needed to ensure consistent application across the district. Catesby reserve the right to provide further comments on the policy wording at later stages of the Local Plan process.	Support	The Council considers that applying more detailed or prescriptive requirements for schemes below 10 dwellings would not be proportionate and could impact deliverability. However, the need for clarity and consistency in the policy wording is noted, and this will be kept under review as the Local Plan progresses.
674	14258	AWG Landholdings [674]	Our client is generally supportive of Strategic Policy LP2 which sets out the requirement to deliver a mix of different types, sizes, and tenure of housing. However, it is considered that the draft policy wording is lengthy, repetitive, and lacks clarity. The proposed wording of Strategic Policy LP2 is set out below for reference: "The Council will work with the development industry and housing providers to deliver a mix of dwelling types, sizes and tenure within the housing growth proposed for the District which reflects the Council's overarching vision for growth in Tendring District and the evidence of housing need contained in its latest Strategic Housing Market Assessment	Comment	The Council does not agree that the policy is overly lengthy, repetitive, or lacks clarity. The current wording reflects the need to strike an appropriate balance between providing clear direction on housing mix requirements and ensuring that such requirements remain proportionate and firmly evidence-based. The Council is also mindful that other representations have called for greater detail and prescriptiveness within the policy. As such, the approach taken seeks to balance these differing views while maintaining alignment with national policy. Nevertheless, the comments regarding clarity are noted and will be kept under review as the Local Plan progresses.
1718	14310	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning object to the element of Policy LP2 that states that for 10 or more dwellings, the Council will require a mix of dwelling sizes, types, and tenures that aligns with the housing needs identified in the most recent Strategic Housing Market Assessment. This is an onerous requirement for small sites and it also does not recognise the different types of housing that are expected to be delivered. Therefore, it is considered that the threshold should be increased.	Object	The Council does not agree that the requirement set out in Policy LP2 is unduly onerous for smaller sites (assuming that this part of the objection is referring to sites of 10 or more units but not exceeding a number much more than 20). Also, the policy has been drafted to ensure that all qualifying developments contribute appropriately to meeting identified housing needs, as evidenced through the Strategic Housing Market Assessment, while retaining sufficient flexibility to respond to site-specific circumstances. The threshold of 10 dwellings is considered appropriate and proportionate, and aligns with common policy approaches for applying more detailed housing mix requirements. At present, there is insufficient evidence to justify increasing this threshold.

					The Council considers that the policy wording already provides an appropriate degree of flexibility, including scope to respond to viability and site constraints. The matter will, however, be kept under review as the Local Plan progresses.
1692	14346	Lewis & Scott Homes [1692]	The introduction to this statement and our comments on previous policies set the scene in terms of our concerns about the extent to which the plan is planning positively to meet the needs of the older community – a community that will represent 62% of the population by the end of the plan period. We do not believe that the current wording of this policy goes far enough to ensure that this need will be met and therefore OBJECT to the current wording. Its failure to provide for older person accommodation means that it is not contributing to the achievement of Objective 1 of the plan as it will not help to 'meet the needs of a growing and ageing population in full'. (See attached document for proposed changes)	Object	The Council acknowledges the concerns raised regarding the need to plan positively for an ageing population. However, it does not agree that Policy LP2 fails to address this issue. The Strategic Housing Market Assessment (SHMA) provides a robust evidence base which specifically engages with the matter around the significant increase in the age provide in the local population, including the significant increase in the number of people aged 75 and older. The latest SHMA clearly identifies the need for a range of accommodation to meet the requirements of older people, and Policy LP2 seeks to ensure that housing mix across the district reflects this evidence. In addition, Policy LP10 provides a targeted and comprehensive framework specifically for the delivery of specialist accommodation, including care homes, extra care, assisted living and other forms of housing to meet the needs of older and vulnerable residents. Taken together, these policies are considered to provide an appropriate and proportionate response to the needs of an ageing population and to support the achievement of the Plan's objectives. The Council will continue to keep this matter under review as the Local Plan progresses.
Community Representatives					
953	3481	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	The comment is noted and TDC has viewed the attached document. TDC is consulting on current detailed site-specific policies regarding topics which the document mentions such as design matters and specifically utilising Traditional Architecture Design Codes. While your document provides useful and relevant background information on these topics, it does not identify specific policies or sites within the Local Plan. The Council is therefore seeking representations that directly relate to policies or site allocations within the Tendring District.
Members of the Public					
981	3596	Ms Danielle Williams [981]	LP2 requires a mix of dwelling sizes, types and tenure aligned with the SHMA. For Wrabness, the Plan does not justify what mix is intended for MSA28 or how it meets local needs rather than market demand. Without a clear requirement, the site risks delivering larger family homes that increase car-based school and activity trips in an unsustainable location, or conversely a mix that fails to support existing local needs. The allocation should specify a locally evidenced mix (including smaller homes and accessible provision) or be reconsidered.	Object	The Council acknowledges the concerns raised regarding the need to plan positively for an ageing population. However, it does not agree that Policy LP2 fails to address this issue. The Strategic Housing Market Assessment (SHMA) provides a robust evidence base which specifically engages with the matter around the significant increase in the age provide in the local population, including the significant increase in the number of people aged 75 and older. The latest SHMA clearly identifies the need for a range of accommodation to meet the requirements of older people, and Policy LP2 seeks to ensure that housing mix across the district reflects this evidence.

					In addition, Policy LP10 provides a targeted and comprehensive framework specifically for the delivery of specialist accommodation, including care homes, extra care, assisted living and other forms of housing to meet the needs of older and vulnerable residents. Taken together, these policies are considered to provide an appropriate and proportionate response to the needs of an ageing population and to support the achievement of the Plan's objectives. The Council will continue to keep this matter under review as the Local Plan progresses.
1333	3955	Mr Matthew Willis [1333]	The location of housing allocations threatens to destroy the character of rural villages. For example, allocations MSA15 and MSA16 in Great Oakley will increase the number of households in the main village by 25%, and are concentrated at one end. In conjunction with a development that has received planning permission but not begun construction, the size of the village will increase by 50% in around five years. Infrastructure is already inadequate, roads already dangerous, and the village will lose its rural character	Object	The proposed site allocations in Great Oakley have been identified through a robust and evidence-led site assessment process, which considers sustainability, accessibility, and the capacity of settlements to accommodate growth in line with the spatial strategy. The Council recognises that development will result in change; however, the scale of growth proposed is considered proportionate and necessary to meet identified housing needs over the plan period. Impacts on local character, infrastructure, and highways safety will be carefully assessed and managed through the planning application process, supported by relevant technical evidence and mitigation where required. The Council considers that, taken as a whole, the Local Plan seeks to balance the need for growth with the protection of the character and function of rural settlements, and this position is consistent with the approach set out in the June 2026 Committee report.
1342	3983	Mrs Georgina Pomfrey [1342]	We need small retirement bungalows for local residents to buy	Comment	The Council recognises the need for specialist and downsizing accommodation, including bungalows for older residents. Policy requires a range of housing types, informed by evidence, and the Council is encouraging delivery of such homes through both allocated sites and regeneration schemes across Clacton and the wider district.
1352	4024	Mrs Paula Bland [1352]	Very important to deliver affordable housing for those trying to get on the housing ladder or moving up it. We have a more than adequate supply of 4/5 bedroom homes with multiple bathrooms etc. Try building 2 and 3 bedroom houses that the every day family can afford.	Comment	Comment noted. The Local Plan prioritises a balanced housing mix, including 2–3 bedroom homes suitable for local households and those seeking to access or move within the housing market. This is reinforced through policies and ongoing delivery at sites such as Hartley Gardens, Rouses Farm and Oakwood Park, alongside regeneration initiatives in Clacton, ensuring provision better reflects local needs rather than an over-supply of larger homes.
581	4105	Mrs Sally Webb [581]	Housing for young people born in our area is out of their reach financially. Housing Association houses in our village area occupied by many of those who originally took them when built; moving on too expensive.	Object	The Council fully recognises the challenge that locally born residents, particularly younger people, face in accessing housing. In response, the Local Plan includes a more flexible approach to rural exception sites, specifically aimed at delivering affordable homes for people with a local connection in villages. In addition, the Government's updated standard methodology increases overall housing requirements in Tendring, which is intended to boost

					supply and, over time, help ease affordability pressures. However, the Council acknowledges this alone will not resolve the issue. The Plan is therefore supported by a broader strategy, including: • Securing policy-compliant affordable housing on all major sites • Promoting a wider mix of homes, including smaller and more accessible properties • Supporting regeneration and delivery across the district.
1376	4218	Mrs Anja Newman [1376]	Starter homes for young people. Not just 'affordable housing', numbers which inevitably get whittled down. Not everyone who would like to buy a house wants a family. 'Family' homes are unaffordable to most local people and are often big houses on small plots, with not enough green/blue/open space/public transport/bike routes near them, which does not serve needs of a functioning community. Bike routes/transport from the Garden Villages needs to be considered.	Comment	The Local Plan already seeks to secure a broad mix of housing types and tenures, including smaller homes suitable for younger people and first-time buyers, alongside family housing. Policies require this mix to be informed by up-to-date evidence and secured through the development management process, rather than relying solely on a single tenure category. Concerns around viability affecting delivery are recognised; however, the Council has been clear—through the Committee Report and ongoing negotiations—that policy-compliant affordable and appropriate housing provision remains a priority across all allocations. For larger strategic sites and Garden Communities, the Plan requires comprehensive masterplanning, including: • Active travel infrastructure (walking and cycling routes) • Public transport integration • Adequate open and green/blue space This ensures new communities are not car-dependent dormitories, but support a balanced, functioning community with a range of housing options—responding directly to the needs identified in the objection
969	4271	Mr Scott Gilmour [969]	Delivering a range of homes will help to provide a greater variety of options for Tendring. Compared to other LADs, households in Tendring have less car ownership. New housing developments should reflect this by prioritising the construction and improvement of nearby amenities, public transport and active travel infrastructure.	Support	Comment noted.
719	14373	Mr Peter Harris [719]	Housing Choice Proposed Amendment: Add explicit reference to: " including provision for armed forces veterans and other groups with specific housing and support needs, alongside support for park homes, modular homes and other innovative forms of residential accommodation."	Comment	This comment is noted and the Council will look to update the policy by adding explicitly reference to the groups and accommodation type mentioned in the comment.

Policy LP2: Housing Choice

Summary of Representations

Representations were generally supportive of Policy LP2 and the principle of securing an appropriate mix of dwelling sizes, types and tenures informed by the Strategic Housing Market Assessment (SHMA). Support was expressed from housebuilders, landowners, infrastructure providers and members of the public for the overall approach of planning positively for a balanced housing stock and affordable housing provision. A number of representations highlighted the need to respond more explicitly to the requirements of an ageing population, including the provision of specialist and supported housing, retirement accommodation, accessible homes, bungalows, extra-care housing and dementia-friendly design principles. Essex County Council referenced the findings of the Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA 2025), whilst the Integrated Care Board highlighted emerging guidance on dementia-ready housing. Other representations suggested that Policy LP2 should contain greater flexibility, be shortened or simplified, or increase the threshold at which housing mix requirements apply. Conversely, others sought more prescriptive requirements for older persons' accommodation and housing for specific groups. A small number of comments sought changes relating to matters already addressed elsewhere in the Plan, including flood risk considerations, site-specific housing mixes and specialist accommodation provision.

Having regard to the representations submitted, changes have been made to Policy LP2 and its supporting text. Policy wording has been updated to support accommodation for armed forces and other groups with specific housing and support needs. The supporting text for Policy LP2 has also been updated in respect of housing needs, with reference to the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA), and a paragraph has been added to encourage inclusive and adaptable design features within new housing developments.

Policy LP3: Housing Density and Standards

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Community response
Technical Stakeholders					
791	3712	Sport England (Mr Roy Warren, Planning Manager) [791]	Support is offered for the inclusion of Active Design principles in part g of the policy as this will help ensure that new residential development is designed to maximise the potential for encouraging physical activity. This aligns with the Local Plan's vision and objectives as well as health and wellbeing policies. The policy would accord with Sport England's Uniting the Movement Strategy and Active Design Guidance and would also be consistent with Government planning policy especially in paragraphs 96 and 129 of the NPPF.	Support	Noted.
349	4300	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Ensure pedestrianised areas provide sufficient access for all emergency services, with defined areas for safe refuge of pedestrians and cyclists if required. Benches should be provided at regular intervals to allow those with mobility issues to rest. Seating should also be available at public transport stops/hubs as for those with mobility issues, standing can cause fatigue. The policy should include EV infrastructure, for homes, commercial and health/emergency services. The provision of shared charging areas for vehicles which are used by health, social, emergency services, public transport and local authority services to ensure these assets are fully utilised.	Comment	The Council notes these comments. It is considered that Policy LP3 already provides a sufficiently robust and flexible framework to secure high-quality, accessible and sustainable design, including matters such as emergency access, inclusive public realm, and infrastructure provision. The specific measures suggested will be considered, where appropriate, on a case-by-case basis through the planning application process, having regard to site circumstances and relevant supporting evidence.
6	13458	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	• Anglian Water would welcome the inclusion of explicit reference to sewerage infrastructure within clause (f). • Alternatively, the policy could be broadened to refer to "utilities infrastructure and associated easements", providing a more comprehensive approach to all utilities, particularly below-ground pipes and cables. • The policy currently does not set out any density requirements or thresholds. However, development density is an important factor in enabling community-scale rainwater reuse systems. • The *Water Reuse in New Housing: Understanding the Business Case* report (Enabling Water Smart Communities) highlights the importance of the relationship between development density and the cost-effectiveness of rainwater reuse solutions. In particular: • External pipework forms a significant component of costs for community systems. • Community-scale rainwater reuse systems become more cost-effective than individual (on-plot) systems at densities of approximately 60 dwellings per hectare or above.	Comment	The Council welcomes the suggestion to refer to "utilities infrastructure and associated easements" and will seek to incorporate this into a future update of the policy. It is considered that the requirements set out in Policy LP3 are necessary and applicable to all development, regardless of density, in order to secure high-quality and sustainable outcomes. The Council also notes the evidence relating to the viability of community-scale rainwater reuse systems and has added wording in the supporting text of Policy LP2 to reflect this.

			• The findings indicate that density, rather than overall site size, is the key determinant in the viability of such systems.		
823	13527	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Comments on Policy LP3 – Housing Density & Standards General Support and Transport Approach Support for Policy LP3 in principle, particularly in helping to embed a transport-first approach. Suggested addition: • Higher densities should be focused in locations where public transport (including rapid transit) and active travel networks already exist or can be delivered. • In such locations, plot-level parking restraint should be applied, in line with EPOA Parking Guidance. • This could be included as advisory guidance for applicants/developers when designing schemes under this policy. EV Infrastructure and Mobility Hubs (LP3) Recommended additions: • EV provision should follow Building Regulations Part S and align with the ECC EV Charge Point Strategy, including the delivery of: o Mobility/charging hubs at local centres and intercept points o Infrastructure to serve residents without access to private driveways • Provision of passive infrastructure (e.g. ducting and capacity) to enable future expansion • Inclusion of charging facilities for electric bicycles and micro-mobility, where appropriate Education Infrastructure (Policy LP3f – Page 66) • Schools (particularly secondary schools) require significant land take. • On some allocations, on-site education and childcare facilities will be necessary to: o Serve the development o Address cumulative impacts o Support delivery of the Local Plan Recommendation: • These requirements should be explicitly referenced within the policy, given their scale and importance. Green and Blue Infrastructure • Support for the inclusion of green and blue infrastructure as integral on-site requirements. • While the policy appropriately references Active Design principles, it could be strengthened by: o Requiring delivery of functional Green Infrastructure (GI)	Comment	The Council welcomes these constructive suggestions and will review how they can be appropriately reflected within Policy LP3 and supporting text. Any updates will be subject to ensuring that requirements remain proportionate, evidence-based, and do not adversely impact development viability.

			○ Aligning with recognised standards, such as the Essex Green Infrastructure Standards Accessibility and Standards Support • Positive inclusion of Nationally Described Space Standards (NDSS) • Support for emphasis on good design and functional layouts Concerns • Accessibility requirements (M4(2) and M4(3)) are based on the Tendring District Housing Viability Assessment (May 2017), which is now outdated • The study should be updated to reflect changes in house prices and build costs Current requirements: • Market housing: 10% M4(2) • Affordable housing: 95% M4(2), 5% M4(3) Issues identified: • Market housing requirements do not reflect need identified in the SSHANA (2025) • Risk of under-provision of accessible and adaptable homes • Policy does not incorporate dementia-inclusive design principles Evidence (SSHANA 2025) • Identifies a clear and increasing need for accessible and adaptable homes • Reflects Tendring's growing older population Key Concerns • Limited accessibility requirements for market housing • Reliance on outdated viability evidence • Lack of dementia-inclusive design principles • Risk of under-delivery of: ○ Accessible homes ○ Adaptable homes ○ Inclusive housing across all tenures Suggested Changes / Next Steps • Strengthen requirements for accessible and specialist housing, aligned with SSHANA (2025) • Increase provision of accessible homes to reflect evidenced need • Confirm accessibility requirements apply to all developments, not just larger sites • Ensure schemes incorporate inclusive design principles Suggested Policy Wording "All new homes, both market and affordable, should meet accessibility standards, with 95% to Building Regulations Part M4(2) 'accessible and adaptable' standard and 5% to Part M4(3)		

			‘wheelchair-user’ standard. All new homes should also incorporate dementia-inclusive design principles.”		
Businesses, Landowners and Developers					
1215	3909	Pigeon [1215]	Policy LP3 is supported.	Support	Noted.
1336	4330	Pigeon [1336]	Pigeon has promoted the strategic housing allocation at Site Ref. SAH6 in Alresford. The proposed development would meet the housing density and standards in Policy LP3. Policy LP3 is supported.	Support	Noted.
136	4417	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	Similar types of policy have been found in many up-to-date development plans and are consistent with national policy.	Support	Noted.
1439	13878	Catesby Estates [1439]	Catesby broadly support the objectives of the draft policy relating to Housing Density and Standards, which seeks to ensure that residential development achieves an appropriate density while responding positively to site context, accessibility, and design considerations. The Site is capable of delivering development in accordance with these principles. A density range of approximately 32–40 dwellings per hectare has been applied to land within Catesby’s control, indicating that the Site could accommodate up to approximately 1,033 dwellings. Densities towards the upper end of this range are considered appropriate given: • The Site’s sustainable location adjacent to Harwich and Dovercourt • Good access to services and facilities • The opportunity to deliver a well-designed, high-quality development that uses land efficiently and minimises the need to release additional agricultural land elsewhere This approach would also enable the appropriate provision of: • Green infrastructure • Community facilities • Active travel connections However, Catesby note that the policy applies to all residential development, including small-scale proposals and conversions, yet includes detailed references to on-site infrastructure such as: • Substations • Adoptable highways • Community facilities It is therefore recommended that the policy wording be amended to ensure such requirements are proportionate to the scale and nature of development, and only expected where appropriate. This would help ensure the policy remains effective and consistent with the approach set out in the NPPF.	Comment	The Council considers that criterion f is already sufficiently flexible, requiring consideration of on-site infrastructure requirements that need to be incorporated into the layout of a development. The nature and extent of such infrastructure will necessarily be proportionate to the scale, type and circumstances of the proposal. As such, no significant amendment to the policy is considered necessary in this regard. However, for added clarity, the wording of criterion f has been amended to refer to "utilities infrastructure and associated easements", reinforcing that infrastructure expectations will be determined on a case-by-case basis.

1643	14196	Bradfield Fruit Farm (Johnny Piper) [1643]	We ask for the inclusion of land at and adjacent to Bradfield Fruit Farm in the Local Plan, we feel it is more sustainable, accessible, and deliverable than the Rose site. Policy LP3 (Housing Density and Standards) is referenced in support, particularly LP3 objectives on good accessibility to local services, active design principles, and appropriate transitions between built development and countryside. Our representation contends that development at the Fruit Farm could achieve suitable density near the village "activity hub," enabling walkability, efficient land use, and high-quality design standards consistent with LP3, whereas the alternative site performs poorly against these criteria.	Support	Whilst the site may have some accessibility advantages, the Council's assessment concludes that development of this land would not relate well to the existing form and pattern of the settlement. The site would represent an incongruous extension into the countryside and would not achieve a suitably integrated or logical relationship with the built-up area. Consequently, the site is not considered appropriate for allocation.
674	14259	AWG Landholdings [674]	Our client is generally supportive of Non-strategic Policy LP3, which sets out the requirement to achieve appropriate housing density for new residential uses, having regard to a number of factors identified within the draft policy wording. However, it is noted that point c) relates to "the required mix of housing". As set out in response to Strategic Policy LP2, the expectations for housing mix are not clear and need to be clarified. We reserve the right to comment further on the policy wording within future stages of Local Plan consultation.	Comment	Comment noted.
1718	14311	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning wish to object to the reference to Class C of the GPDO as amended in the first paragraph. We consider that this may be an error and ought to reference Class C2 and C3 of the Use Class Order.	Object	The wording of the policy has been updated to now make it explicitly that the policy seeks to cover new residential and mixed-use developments as this is clearly the intention of the policy to cover those types of developments.
Community Representatives					
953	3482	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1550	13971	PACE (John Hall) [1550]	Tendring Council has passed a Motion that it will not give planning permission for new housing developments where the developer is using Restrictive Covenants in House Sale Contracts to prevent the new house owners from installing sustainable features such as Roof Top Solar Panels. This should therefore be included in both these policies.	Comment	Whilst these comments are noted, the Council would not be able to refuse applications based on restrictive covenants, as they are not a material planning consideration.
258	4278	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly support Objective 6, locating development to minimise travel. However, most traffic from our area passes through Thorpe-le-Soken High Street. Proposed sites east of the village (approx. 860 homes) will worsen existing capacity issues, already recognised by Planning Inspectorate. Without alternative routes or a bypass, this growth risks road safety, severe congestion, and harm local businesses, particularly in Frinton, Walton, the Kirbys, and Great	Comment	The Council recognises existing concerns regarding traffic congestion and highway capacity in Thorpe-le-Soken and the wider area. These matters have been considered as part of the site assessment and plan-making process. Since earlier iterations of the Local Plan, the scale of proposed growth in Thorpe-le-Soken has been reduced, reflecting infrastructure considerations and the outcomes of the Council's evidence base. Any future development will be required to demonstrate

			Holland during peak tourist seasons. Tourism is vital to the local economy and already constrained by traffic. A bypass is essential to ensure sustainability. Large-scale planned communities offer better opportunities for integrated, sustainable transport solutions.		that its transport impacts can be appropriately mitigated and that it accords with national and local policies promoting sustainable travel. The Council therefore considers that the proposed level of growth is capable of being accommodated without necessitating a bypass as a prerequisite for allocation.
Members of the Public					
981	3597	Ms Danielle Williams [981]	Density should reflect accessibility to services, settlement character and infrastructure capacity. Wrabness has very limited walkable services and constrained rural access, so higher densities would be inappropriate and would intensify parking and traffic impacts. The Plan does not clearly justify the proposed number of homes in relation to site area, resulting density, or how the layout will reflect the existing loose-knit rural form and countryside edge. Any development should be low density, landscape-led, and demonstrably compatible with local character and access constraints; otherwise the allocation is not justified.	Object	Policy LP3 already requires housing density to reflect site-specific circumstances, including accessibility to services, local character, infrastructure capacity and the relationship with the countryside. Any development proposal would be expected to demonstrate that it responds appropriately to the rural character and constraints of the area, and no amendment to the policy is considered necessary.
984	3610	Mr Stephen Harrod [984]	MSA28 will increase the population/houses by 65% over the past few years where there are no near facilities. This is far too excessive and will have a major impact on those that reside in this area.	Object	Policy LP3 does not prescribe specific housing numbers but seeks to ensure that development is delivered at an appropriate density having regard to accessibility, local character, housing mix and infrastructure considerations. The suitability and scale of individual site allocations have been assessed separately through the site selection process and supporting evidence base.
1352	4023	Mrs Paula Bland [1352]	Reasonable size gardens are needed to encourage good health and more than adequate off road parking. In reality there needs to be the equivalent of a parking space for every bedroom in property as that's likely to be the number of vehicles in that house when the children are adults. There also needs to be adequate visitor parking. There's no point having 'car parks' on housing estates. One can't leave a young child in a car/indoors unattended while unloading a car.	Comment	Policy LP3 seeks to secure high-quality residential environments through appropriate density and design standards. Matters such as garden sizes, parking provision and visitor parking are addressed through detailed design considerations and the application of relevant parking standards, the NPPF and design guidance including guidance from ECC. No amendment to the policy is considered necessary.
581	4106	Mrs Sally Webb [581]	I cannot see anyone achieving this statement.	Object	The Council considers that the requirements of Policy LP3 are achievable and consistent with national policy and established design principles. There are many examples of high quality developments across the district where similar design standards as set out in this policy, have been achieved. The policy provides a framework to ensure that housing density is considered alongside character, accessibility, infrastructure and quality of design. No amendment is proposed.
969	4274	Mr Scott Gilmour [969]	Density must be implemented sustainably, preventing sprawl and facilitating a high number of homes in the centres of towns to rejuvenate the high street and reflect how they have grown in the past century. The garden villages can hopefully implement these sustainable principles from their inception and be an example of how a town can integrate a variety of densities to provide a high quality of life.	Support	Comment noted.

Policy LP3: Housing Density and Standards

Summary of Representations

Representations were generally supportive of Policy LP3 and its objectives to secure appropriate housing densities, high-quality design, accessibility, sustainable development, and active travel. Support was expressed for the inclusion of Active Design principles and the policy's alignment with health and wellbeing objectives. Representations supported higher-density development in accessible and sustainable locations, good design, functional layouts, and reference to Nationally Described Space Standards. Requests were made for strengthened reference to EV charging infrastructure, mobility hubs, utilities infrastructure, education facilities, green infrastructure, and blue infrastructure. Representations also requested stronger accessibility requirements, including increased provision of M4(2) and M4(3) homes, as well as consideration of dementia-inclusive design principles. Other representations suggested the policy broaden infrastructure requirements to include utilities infrastructure and associated easements, including sewerage infrastructure, whilst others called for infrastructure to remain proportionate to the scale and nature of development. A suggestion was made that development density can support the viability of community-scale rainwater reuse systems. General comments were also made regarding parking provision, settlement character, local infrastructure capacity, accessibility to services, site-specific allocations, and the relationship between density and sustainable patterns of development. Overall, there was broad support for the policy, with most comments seeking clarification or enhancement of supporting text rather than fundamental changes to the policy approach.

In response to the representations submitted, changes have been made to Policy LP3 and its supporting text. Policy wording has been amended to delete specific reference to class C of the GPDO and to include mixed-use developments. Criterion f now refers to utilities infrastructure and associate easements, in response to representations received. Policy wording has also been strengthened to support increased provision of M4(3)b and M4(2) accessibility standards. Additionally, the supporting text has been revised to mention community-scale water efficiency and rainwater reuse systems as it relates to development density.

Policy LP4: Development Layout & Design

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
791	3711	Sport England (Mr Roy Warren, Planning Manager) [791]	Support is offered for the inclusion of Active Design principles in part g of the policy as this will help ensure that new residential development is designed to maximise the potential for encouraging physical activity. This aligns with the Local Plan's vision and objectives as well as health and wellbeing policies. The policy would accord with Sport England's Uniting the Movement Strategy and Active Design Guidance and would also be consistent with Government planning policy especially in paragraphs 96 and 129 of the NPPF.	Support	Comment in support noted.
791	3713	Sport England (Mr Roy Warren, Planning Manager) [791]	Support is offered for this policy especially parts a and b as they promote health and wellbeing through the integration and enhancement of green infrastructure and locating public open where it is accessible by active travel modes. The policy also makes reference to Active Design and other guidance that supports health and wellbeing in development. This aligns with the Local Plan's vision and objectives as well as health and wellbeing policies. The policy would be considered to accord with Sport England's Uniting the Movement Strategy and Active Design and would also be consistent with Government planning policy in the NPPF.	Support	Comment in support noted.
349	4301	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Comments by health partners	Comment	The Council supports the health sector's continued engagement in the plan-making process and considers that the policy's emphasis on health, wellbeing, active travel and green infrastructure aligns with these objectives. No amendment is required.
6	13459	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water is supportive of the new clause ensuring that new residential and mixed-use developments incorporate surface water management considerations. However, we suggest that all new development proposals should follow the surface water drainage hierarchy and incorporate sustainable drainage systems (SuDS) as part of an integrated water management approach. We do not consider that SuDS should only be required for major developments, as the cumulative impact of minor developments discharging to surface water sewers could present capacity challenges. Existing surface water networks have been designed for the existing catchments and will not have any significant residual capacity.	Comment	The Council supports the use of SuDS and the surface water drainage hierarchy. However, criterion c is focused on ensuring comprehensive surface water management for major residential schemes, consistent with established policy requirements. The Council considers the current wording strikes an appropriate balance and no amendment is proposed.

			Furthermore, for new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and applicants can demonstrate that no other option is feasible - only then may a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow.		
823	13528	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Comments / Change Required • Positive that LP4 emphasises high-quality design and layout, providing a basis for strengthening inclusive and accessible design and communities across all new development. • LP4 should strengthen its focus on inclusive and accessible external environments for all, including clear, accessible, easy to navigate routes, public realm and neighbourhood layouts that enable older people and people with disabilities to move around independently and access everyday services. Strengthening these elements would help ensure LP4 supports inclusive accessible places across the district. • The SSHANA (2025) identifies a clear need for accessible and adaptable homes across all population groups, including older people and people with disabilities, and mental health needs. LP4 should reflect this evidence to ensure layouts and public realm support independent living and inclusive accessible communities for all. • Policy LP4 should include dementia-inclusive design considerations consistent with Essex and national guidance, including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024). Dementia-inclusive design is widely recognised as a 'universal design' approach, so while it supports people living with dementia, it also improves accessibility, safety, and functionality for everyone, including older people, people with disabilities and families with children. • LP4 currently requires well designed sites and buildings but does not secure the accessible routes, layouts and public realm needed to ensure inclusive communities for all residents. • Reference to the Essex Design Guide (Inclusive Design) would ensure developments deliver inclusive neighbourhoods, accessible routes and environments that support independence and community inclusion. Policy LP4 does not embed inclusive design or dementia inclusive design principles. This omission risks new development failing to respond to identified needs across all population groups and weakens the ability of the Local Plan to secure layouts and public realm that support independence and inclusivity for all residents.	Comment	The Council agrees that inclusive design principles should be given greater emphasis within Policy LP4. The supporting text will be reviewed to include reference to inclusive design guidance, including dementia-friendly design principles where appropriate, alongside the Essex Design Guide. The Council also agrees that criterion a could be strengthened through reference to multifunctional green infrastructure and relevant local green infrastructure standards. The suggested transport-related matters are already broadly captured through criteria e and f and supporting guidance.

			Next Steps / Alternative Wording Developments will demonstrate compliance with the Essex Design Guide -Inclusive Design to ensure layouts, access routes and public realm support inclusive, accessible environments and communities that enable independence for all residents. Developments will incorporate dementia inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024). Primary streets need to be bus-capable with priority at key egress points; layouts shall maximise permeability for walking/wheeling/cycling. ECC suggest that this could from a new criterion in the policy ECC supports the policy's emphasis on integrating and enhancing green infrastructure to promote health and wellbeing. However, we recommend that the wording is strengthened by explicitly referring to multifunctional Green Infrastructure, to reflect its wider benefits beyond health, such as biodiversity, climate resilience, open space quality and the role of SuDS as nature-based solutions. We also recommend referencing in the second to last paragraph - local GI standards, such as the Essex Green Infrastructure Standards, to ensure the delivery of high-quality, functional and connected GI across new developments and nature based solutions. We also recommend referencing in the second to last paragraph - local GI standards, such as the Essex Green Infrastructure Standards, to ensure the delivery of high quality, functional and connected GI across new developments. a. actively promote health and wellbeing through the integration and enhancement of multifunctional green infrastructure.		
148	14468	Environment Agency (Environment Agency) [148]	The Council should add a policy requirement for new residential and mixed-use development to apply a sequential approach to site layout, directing the most vulnerable uses to the lowest flood risk areas. This should minimise risk to buildings, occupants and users, while accounting for future climate change impacts. Incorporating this would ensure the policy aligns with the aims of NPPF paragraph 181(a) and guidance set out in paragraph 004 of the Flood Risk and Coastal Change PPG.	Comment	The Council agrees that flood risk considerations should inform site layout from the earliest stages of design. Supporting text will be reviewed to clarify the expectation that development proposals apply a sequential approach within sites where required (i.e. where some areas within sites are at risk of flooding – the vast majority of sites allocated for residential / mixed use development is in flood zone 1), however where required to ensure the policy is consistent in directing the most vulnerable uses to areas of lowest flood risk where appropriate.
Businesses, Landowners and Developers					
88	3846	Stanfords (Miss Mollie Foley) [88]	The response supports Policy LP4's focus on high-quality, well-designed places but highlights a key omission: the policy does not address neurodiversity or the needs of people with sensory or cognitive differences. It recommends explicitly referencing	Comment	The Council supports the principle of inclusive design for all users. However, it considers that Policy LP4 should remain focused on overarching layout and design principles rather than specific user

			neurodiversity in specialist and supported housing, incorporating sensory-friendly design principles, and aligning the policy with relevant inclusive design standards such as BS 8300 and Equality Act duties. It also calls for improved evidence-based assessments, including better data on neurodivergent populations.		groups. Broader references to inclusive design within supporting text and guidance will be considered.
1215	3910	Pigeon [1215]	Policy LP4 is supported.	Support	Support noted.
1336	4332	Pigeon [1336]	Pigeon has promoted the strategic housing allocation at Site Ref. SAH6 in Alresford. The proposed development would meet layout and design criteria in Policy LP4. Policy LP4 is supported. The final paragraph of Policy LP4 refers to national and local design guidance. These documents have not been adopted by Tendring District Council, and as such should not be included within policy and used as a basis for decisions on planning application. It is requested that these documents are moved to supporting text, so that applicants can refer to the documents for design guidance when preparing planning applications.	Support	The Council agrees that the referenced design guidance is more appropriately contained within supporting text rather than the policy itself. The policy wording is not proposed to change, but the presentation of guidance will be reviewed for clarity.
1422	4431	M Scott Properties Ltd (Scott Properties) [1422]	Support the importance of design and layout in creating a sense of place and activity to promote health and wellbeing through integrated green infrastructure. The statutory biodiversity net gain framework established by the Environment Act 2021 has a mitigation hierarchy with compensation on site, then off-site units, with statutory biodiversity credits a final option. Paragraph a. as currently worded requires biodiversity net gain on-site and is not considered to be justified or effective as it does not reflect national legislation or policy set out in the NPPF 2024. It is recommended paragraph a. is amended with revised wording provided.	Comment	The Council accepts that biodiversity net gain can be delivered through the nationally prescribed hierarchy. Criterion a will be reviewed to ensure consistency with national legislation and Policy PPL4a whilst continuing to encourage on-site delivery wherever possible.
431	4451	Welbeck Strategic Land [431]	There is no absolute requirement that Biodiversity Net Gain has to be achieved on-site. There is a hierarchy in place at the national level and this should be followed with preference given to on-site Biodiversity Net Gain followed by buying credits to deliver the gain off-site. The correct approach is identified in New Strategic Policy PPL4a and should just be cross referenced in Non-Strategic Policy LP4(a).	Object	The Council agrees that Policy LP4 should align with the statutory biodiversity net gain framework and the approach set out in Policy PPL4a. Criterion a will be amended to encourage on-site provision whilst recognising the national hierarchy for off-site delivery where necessary.
134	13681	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	Criterion (g) refers to EPOA parking guidance. It is possible that the council may want to refer to other parking guidance in due course. It is suggested that reference to EPOA is deleted.	Comment	The Council considers it appropriate to reference the currently adopted parking guidance. However, criterion g will be reviewed to ensure sufficient flexibility to take account of any successor guidance adopted during the plan period.
1439	13879	Catesby Estates [1439]	Catesby broadly support the objectives of the Draft Policy relating to Development Layout and Design, which seeks to ensure that new residential and mixed-use developments contribute positively to the District's sense of place through high-quality design, appropriate layout, and the integration of green infrastructure. As outlined in the Vision Document, the Site is capable of delivering development in accordance with these principles through a well-considered layout that incorporates green infrastructure, accessible public open space, and a high-quality residential environment.	Comment	The policy does not require the preparation of masterplans or development briefs in all circumstances and is intended to provide flexibility, particularly for larger or more complex sites. The Council considers the existing wording already reflects this approach and no amendment is required.

			However, Catesby note that the policy indicates that masterplans or development briefs may be prepared ahead of any planning application submissions. While masterplanning can be a valuable tool, particularly for larger or more complex sites, it should not be a requirement that prevents planning applications from coming forward. It is therefore recommended that the policy wording be amended to clarify that masterplans may be encouraged where appropriate, rather than required prior to the submission of planning applications. Such an approach could introduce unnecessary delay and potentially hinder the timely delivery of new homes. It is therefore recommended that the policy wording be amended to clarify that masterplans may be encouraged where appropriate, rather than required, to ensure that the policy provides sufficient flexibility and does not prevent or delay housing delivery in line with the objectives of the NPPF.		
119	14059	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	The Council state in part a that actively promote health and wellbeing includes "delivering the required measurable biodiversity gain on site". While national policy suggests that as much biodiversity net gain should be delivered on site as possible, national policy recognises that this may not be possible and allows offsite delivery or the purchase of national credits. Given that the Council's own policy recognises this as well part a should be amended accordingly. Part c states that SuDS must be in line with the latest best practice and current policy requirements. Firstly, development should only have regard to the latest best practice rather than be in line with it. In effect the Council are giving the weight of policy to best practice, which is not consistent with legislation supporting the preparation of development plans and supplementary guidance. Secondly there is no need to state that SUDs should be in line with current policy requirements as this is simply a statement of the obvious. HBF would suggest the policy is amended to "…implementation of SUDS, having regard to the latest best practice". Similarly part g states that development should be in accordance with EPOA Parking Guidance. This should be amended "… to have regard to EPOA Parking Guidance".	Comment	The Council agrees that criterion a should be reviewed to ensure consistency with the statutory biodiversity net gain framework. However, the Council considers it appropriate for SuDS and parking provision to accord with relevant standards and guidance and does not propose the suggested amendments.
1643	14202	Bradfield Fruit Farm (Johnny Piper) [1643]	We are promoting inclusion of land at and adjacent to Bradfield Fruit Farm, arguing it better complies with sustainability and design-led policies than the alternative Rose site. Policy LP4 (Development Layout and Design) is supported, particularly its emphasis on active design, health and wellbeing, walkability, and integration with existing village facilities. Our representation contends that the Fruit	Comment	Whilst the Council acknowledges the submitter's view that the site could deliver development consistent with the objectives of Policy LP4, the site assessment concludes that the land would not relate well to the existing form and pattern of development within Bradfield. Development of the site would extend the settlement into the open countryside in a manner that is not considered to represent a logical or well-integrated extension

			Farm site enables high-quality layout, appropriate density, and a strong relationship with the village hall, school and services, delivering a coherent, well-designed extension of the settlement consistent with LP4 objectives.		of the village. Consequently, the site is not considered suitable for allocation.
1692	14347	Lewis & Scott Homes [1692]	We OBJECT to criterion k of this policy. There will be many instances where proposals do not comply with 'all other requirements' of a Local Plan. The criterion is unnecessary and unjustified and should be deleted.	Object	Criterion k ensures that Policy LP4 is read alongside the Local Plan as a whole and avoids unnecessary duplication of policy requirements. The Council considers this remains justified and no amendment is proposed.
1722	14395	Stanfords (Mollie Daniels) [1722]	Policy LP4 broadly supports high-quality, place-based design but lacks explicit reference to neurodiversity, creating a gap in its otherwise inclusive approach. While it addresses wellbeing, safety and connectivity, it should better incorporate sensory and cognitive needs. Recommended amendments include recognising neurodiversity in specialist housing, introducing sensory-friendly design principles (e.g. lighting, acoustics, wayfinding), and referencing relevant standards such as BS 8300 and the Equality Act 2010. The policy should also require evidence-based assessments of local neurodiverse needs. Overall, LP4 should be strengthened to ensure more inclusive, accessible and responsive design outcomes.	Comment	The Council recognises the importance of inclusive design principles. However, it considers that the policy should remain focused on broad design outcomes rather than specific groups. Supporting text will be reviewed to ensure appropriate reference to inclusive design considerations.
Community Representatives					
953	3483	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
258	13602	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly support the additions made to this policy, in particular the enhancement of green infrastructure, the earlier considerations of surface water management considerations and the updated parking guidance.	Support	Support noted.
258	14168	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly support the additions made to this policy, in particular the enhancement of green infrastructure, the earlier considerations of surface water management considerations and the updated parking guidance.	Support	Support noted.
Members of the Public					
981	3598	Ms Danielle Williams [981]	New development should provide safe, convenient access to open space and, where families are expected, suitable play and recreation opportunities. Wrabness has no local youth facilities or sports infrastructure and limited safe pedestrian routes, meaning additional residents will need to travel out of the village for education and recreation. The Plan does not demonstrate how safe walking links, usable on-site play/recreation space, and drainage infrastructure will be delivered. Without these, development would increase car dependency and pressure on neighbouring settlements and would not achieve healthy, well-connected place-making.	Object	Non-strategic Policy HP5 states that all new residential or mixed-use development must contribute to the provision, improvement, and maintenance of public open space and play equipment. The policy also emphasises working with partners and sports providers to maintain, expand, and enhance the quality and accessibility of public open spaces, sports, and recreational facilities. Opportunities to improve walking and cycling links to existing open spaces are strongly supported in the Plan.

					Issues relating to drainage are addressed in Strategic Policy PPL5: Water Conservation, Drainage and Sewerage.
1113	3791	Mr Keith Smithard [1113]	I'm not sure how building on a field promotes green spaces and net gain for biodiversity. It reads like a bunch of word salad that does not mean anything. I am concerned that building in the land adjacent to Branscombe Close with destroy the biodiversity specifically the bat habitat.	Comment	Policy LP4 seeks to secure biodiversity enhancement alongside development. The impact of any development proposal on existing habitats and protected species would be assessed through site-specific ecological surveys and the planning application process.
616	3918	Mr Kevin Everitt [616]	LP4 f. states "ensure internal road layouts can safely and comfortably accommodate emergency services, waste collection services, buses (where necessary) and other large vehicles". With regards to MSA24 and MSA25 the final layout may meet that need within the confines of any development but the access via Bentley Road and Mill Lane will not.	Comment	Criterion f relates to the layout and operation of development within a site. Wider highway impacts, including the suitability of access routes, are assessed separately through the site allocation and planning application processes in consultation with the Highway Authority.
1352	4020	Mrs Paula Bland [1352]	Address the existing drainage problems and flooding before building more properties. Ensure that the new roads are wide enough for cars to park (with consideration being give to vehicles being parked on the road). Adequate space between properties so that there is no overcrowding and children's play parks/exercise parks on estates to encourage children and adults out of the house to play/exercise.	Comment	The matters raised, including drainage, parking provision, road design, amenity space and recreational facilities, are addressed through Policy LP4 and related design, infrastructure and parking policies. Detailed requirements will be considered through the planning application process.
581	4108	Mrs Sally Webb [581]	Developers want to build as much as they can on any plot they can. Whilst I applaud the sentiment, houses with such gardens areas will be hugely expensive and will require garden maintenance.	Comment	Policy LP4 does not prescribe specific garden sizes but seeks to ensure that private amenity space is proportionate to the size of the dwelling and appropriate to the character of the area. The Council considers this provides sufficient flexibility.
969	4275	Mr Scott Gilmour [969]	It is essential that new developments weave green infrastructure and active travel into their designs. Not only to bolster biodiversity but to improve quality of life as residents can travel without the need of a car while appreciating their surroundings in a more beneficial manner. (Research shows that birdsong can reduce stress.) Likewise it is important that new developments have sufficient density and mixed use properties to support this to discourage the land occupied and prevent unsustainable travel habits.	Support	Noted.
1417	4390	Mr reginald tricker [1417]	Clearly, high quality design is important as the Weeley Garden Village removes green field land which slopes down towards the valley in Weeley along which the railway runs, and has always been an attractive and open part of the village.	Comment	Noted.

Policy LP4: Development Layout & Design

Summary of Representations

Overall, representations demonstrated strong support for the objectives of Policy LP4, particularly its focus on high-quality design, health and wellbeing, active travel, green infrastructure, biodiversity enhancements, drainage considerations and placemaking. Most respondents considered the policy to be broadly sound, with suggested amendments largely focused on clarification and consistency with national policy and guidance. Following consideration of the representations, only a limited number of targeted amendments are proposed where they would improve the effectiveness, clarity or consistency of the policy.

In response to the representations received, changes have been made to Policy LP4. Criterion a has been amended to strengthen expectations to delivery biodiversity net gain, in accordance with Policy PPL4, and Criterion d has been updated to encourage development to incorporate high-quality, inclusive design and layout principles. Policy wording has also been updated to include references to the Essex Design Guide, Building for a Healthy Life, Active Design Principles, Essex Healthy Places, Livewell Accreditation, and Village Design Statements. Additional wording to support inclusive design measures have been added. In addition to policy wording, the supporting text has been updated to support inclusive and accessible environments, multifunctional green infrastructure, and sequential approaches to flood risk.

Policy LP5: Affordable Housing

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
1335	4368	Affinity Water Ltd [1335]	Affinity owns two sites that are identified as medium sized allocations in Clacton and Manningtree. Policy LP5 is supported.	Support	Comment noted.
823	13529	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Comments / Change Required • Positive that LP5 seeks to secure affordable homes across the plan period. This provides an opportunity to ensure affordable provision includes accessible, adaptable and specialist homes in line with identified needs. • LP5 does not explicitly link affordable housing delivery to the supported and specialist housing needs identified in ECC's SSHANA (2025). The SSHANA sets out clear evidence of affordable specialist and supported housing needs for Tendring across all population groups, including older people and people with disabilities, and mental health needs. LP5 should recognise this evidence to ensure affordable housing provision reflects identified need and supports independent living. • Reference to the Essex Design Guide -Inclusive Design would support the delivery of inclusive affordable homes that promote independence and enable people to live and age well in their communities. ASC welcomes the requirement of 95% of affordable housing to meet M4(2) standards and 5%M4(3)(2)(b) within LP5. However, LP5 does not secure affordable specialist or supported housing that reflects the needs identified in SSHANA (2025). This omission risks under-provision of affordable supported and specialist homes across population groups and weakens the ability to plan for identified needs over the plan period. Next Steps / Alternative Wording "New developments will deliver affordable housing that includes specialist and supported homes where this is supported by the needs identified in ECC's Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)"	Comment	The Council acknowledges the findings of the SSHANA and agrees that affordable housing delivery should continue to respond to identified specialist and supported housing needs. To provide greater clarity, Policy LP5 has been reviewed to include reference to the delivery of specialist and supported affordable housing where justified by the latest evidence, including the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA). The Council considers that this would complement the accessibility and housing choice requirements already contained within Policies LP2, LP3 and LP10.
849	13586	NHS Property Services Ltd (NHS Property Services) [849]	NHSPS welcomes the recognition of key worker homes within specialist affordable/market homes in supporting paragraph 5.28 for Strategic Policy LP5 (Affordable Housing), and the inclusion of key workers' dwellings within Strategic Policy PP15(c) with regards to development outside of defined Settlement Development Boundaries, in line with our previous representation at early Regulation 18 stage (2025).	Comment	The Council supports ongoing engagement with NHS partners and healthcare providers through the plan-making process. Housing needs evidence will continue to be reviewed and updated periodically, but no amendment in this regard to Policy LP5 is required.

			To support the implementation of these policies, we recommend that the Council: • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.		
Businesses, Landowners and Developers					
609	3837	Hills Building Group [609]	Strategic Policy LP5 seeks 20% affordable housing on any sites delivering 10 or more homes or on sites of one hectare or more. This approach, based on latest viability evidence, is supported. It also provides for a lesser amount of affordable housing where a development is not economically viable in accordance with the Planning Practice Guidance.	Support	Support noted.
1215	3911	Pigeon [1215]	Strategic Policy LP5 seeks 20% affordable housing on any sites delivering 10 or more homes or on sites of one hectare or more. This approach, based on latest viability evidence, is supported. It also provides for a lesser amount of affordable housing where a development is not economically viable in accordance with the Planning Practice Guidance. Policy LP5 is supported.	Support	Support noted.
1002	3962	George Thompson Limited [1002]	Our client supports the proposed requirement in Policy LP5 of the Local Plan Preferred Options document for 20% affordable housing provision on sites of 10 or more dwellings. Notably this is a lower proportion than the 30% required at the two new Garden Villages allocated in the Plan. This reflects the smaller scale of non-garden village proposals and should help to ensure that these smaller sites remain financially viable, whilst still addressing local affordable housing needs.	Support	Support noted.
1336	4333	Pigeon [1336]	Pigeon has promoted the strategic housing allocation at Site Ref. SAH6 in Alresford. The proposed development would provide up to 30 affordable dwellings, and would contribute towards the supply of affordable housing and to the aims of Policy LP5. Policy LP5 is supported.	Support	Comment noted.
1638	4427	Lichfields (Amy Jones, Planner) [1638]	Our client supports case-by-case approach to determining size/type and option to submit a FVA where alternative level is proposed. Council should fully test 20% requirement and set out in evidence base, and fully demonstrate viability when considering all other requirements in the LP. Client strongly objects to the 'single group' limit of 10 dwellings for the purposes of management by RPs. Placing undue restrictions on	Object	The 20% affordable housing requirement is informed by the Council's viability evidence base and is considered justified. The Council acknowledges concerns regarding the practical implementation of the requirement that no single group of affordable housing should exceed ten dwellings and will review this wording to ensure there is flexibility on smaller sites/where site constraints may not necessarily allow for such a requirement. Ultimately, this specific requirement is in place to maintain integration of affordable and market housing.

			group sizes such that developers struggle to find RPs could seriously undermine overall housing delivery. Policy should be clearer on what tenures are included in definition of affordable housing for purposes of a 'single group'.		
136	4428	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	The Council should be applauded for accepting that the requirement for a universal 30% of new housing throughout the district would not be viable due to the costs of delivering other development requirements, particularly 20% BNG, zero carbon provisions and major infrastructure requirements. The reduced level of 20%, other than in the Hare Green and Horsley Cross Garden Communities, is much more realistic with greater scope to be achieved.	Support	Support noted.
1422	4433	M Scott Properties Ltd (Scott Properties) [1422]	Support the Council's affordable housing policy. This policy is considered to be justified, effective and consistent with National Policy as set out in paragraph 36 of the NPPF 2024 and recognises this specific policy does not apply to the Garden Village of Horsley Cross.	Support	Support noted.
1713	13671	City & Country [1713]	Policy LP5 Affordable Housing promotes a mix of housing tenure in the District to address the housing needs of people and families with lower incomes who cannot afford to buy or rent housing on the open market. Policy LP5 explains: "For developments outside the Tendring Colchester Borders Garden Community, the new Garden Village proposals at Hare Green and Horsley Cross, any scheme delivering 10 or more net homes or occupy sites of one hectare or more, the Council requires 20% of new dwellings (including conversions) to be offered to Tendring District Council or its nominated partners at a proportionate discounted value for affordable housing. " The provision of 20% affordable housing, on schemes delivering 10 or more net homes or occupying sites of one hectare or more, is broadly supported subject to a few exclusions. Brownfield and development typologies that have not been modelled in the Council's viability assessments should be excluded from the requirement. Conversions are not suitable as affordable housing due to, for example, high service charges, and are often not viable due to the increased risk and therefore costs. It should be noted that, before s106 and CIL payments 32% of a new house price is paid by the developer in taxes. There is a misconception that sites that for good reason cannot afford s106 or Cil payments are creating a deficit in government pockets. Any s106 or Cil payments are more than covered. A scheme of 100 homes would have a gdv of say £39M (100 units at average size of 1,200sqft and sales of £325psf) at 32% is £12,480,000. Excluding the above, the proposed approach will ensure that sites remain viable while continuing to make a meaningful contribution to meeting identified affordable housing needs. Setting affordable housing at an appropriate level will boost housing land supply and in turn ensure a steady and continuous supply of affordable dwellings are delivered. Policy LP5 also states:	Comment	The Council's viability evidence supports the application of affordable housing requirements across qualifying development types, including conversions, subject to the policy's viability provisions. The Council considers the existing approach appropriate and no amendment is proposed.

			"95% of affordable housing should meet Building Regulations 2015 Part M4 (2) accessible and adaptable standards (or its successor) and 5% of affordable homes to be Part M4 (3)(2)(b) wheelchair user standards (or its successor). " The requirement for M4(2) and M4(3) for affordable houses is supported and again is considered appropriate and deliverable in relation to maintaining the viability of sites. This is not however the case in relation to conversions were M4 (2) and (3) compliance is often not achievable in historic buildings. The policy should be amended to allow for an exception in this regard. Further to the above, subject to the proposed amendments, it is considered that Policy LP5 is justified and is sound in planning terms.		
134	13682	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The proposal to allow housing to be delivered to a local housing trust is strongly supported. However, the council is encouraged to allow such delivery more leniently than only in “exceptional circumstances”. Such housing trust homes have been very successful in supporting local people and provides a useful, alternative model to addressing affordable housing need.	Comment	The Council supports the role that local housing trusts can play in delivering affordable housing. However, the policy intentionally retains flexibility to consider a range of delivery mechanisms on a case-by-case basis and no amendment is proposed.
1439	13880	Catesby Estates [1439]	Catesby broadly support the objectives of Draft Strategic Policy LP5 which seeks to promote a mix of housing tenure and increase the delivery of affordable housing to meet the needs of residents who cannot access housing on the open market. The Site is capable of contributing towards these objectives and will provide affordable housing onsite in accordance with the relevant policy requirements in place at the time a planning application is submitted. This approach will ensure that the development contributes to meeting identified housing needs while remaining responsive to the most up-to-date evidence, in line with the objectives of the NPPF. Catesby note that the policy requires 95% of affordable housing to meet Building Regulations Part M4(2) standards and 5% to meet Part M4(3) wheelchair-user standards. While Catesby support the delivery of accessible housing, any requirement for wheelchair-user dwellings should be clearly supported by up-to-date evidence of need and subject to consideration of site-specific constraints and viability. It is therefore recommended that the policy provides flexibility to ensure that such requirements are applied where justified and deliverable and in line with the latest evidence base.	Comment	The requirement for accessible and wheelchair-user affordable housing is supported by the Council's evidence base and reflects identified needs. The policy already allows viability considerations to be assessed where appropriate and no amendment is proposed.
601	14019	Edward Gittins and Associates (Mr Edward Gittins,	We note the proposed requirement for a minimum of 20% affordable housing on larger sites but this will remain at a minimum of 30% in the case of the Borders Garden Community and Hare Green and Horsley Cross Garden Villages. The 20% minimum represents a reduction in the requirement under current policy and suggests that	Comment	The affordable housing requirements have been informed by site-specific viability evidence. The differing requirements for the Garden Villages reflect their strategic scale, long-term delivery model and ability to support a higher proportion of affordable housing. The Council considers the approach justified and no amendment is proposed.

		Chartered Town Planner) [601]	the Garden Community and Garden Villages are expected to "make good" the reduced provision elsewhere. The implications of the proposed different tariffs are that affordable housing requirements will be reduced throughout the District for many years before housing comes forward in significant numbers where the minimum of 30% applies. It is also not clear why Weeley Green Garden Community differs from the other two Garden Villages by only being expected to deliver a minimum of 20% affordable housing. We consider the justification for the different levels of provision as proposed is not clear and will reduce the delivery of affordable housing during the early years of the Plan period in particular.		
119	14060	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	HBF are concerned that the costs relating to BNG and energy efficiency have been underestimated and that these higher costs could impact on viability and the level of affordable housing provision that can be achieved in Tendring. These must be tested prior to the preparation of the next iteration of this local plan. It is also notable that the Viability Assessment indicates that development of PDL will be challenging at 20% affordable housing in addition to the pother policy costs and that these should not be relied on to deliver homes across the plan period. The evidence would suggest that the policy requirement for affordable housing on such sites is reduced or removed entirely, especially as there a significant windfall allowance within the housing trajectory. HBF would also recommend that the policy should state that specialist housing for older people, such as retirement accommodation and extra care housing, is not required to provide affordable housing. Paragraph 10.79 of the Viability Assessment notes that such accommodation is not viable when all the policy costs are taken into account. The Viability Assessment goes on suggest that these should be assessed at the development stage. However, where it has been tested and found not to be viable it makes no sense not to amend policy at this stage and avoids developers of homes for older people to negotiate on a site by site basis. Such a policy would also send a signal to those developing specialist accommodation for older people that the Council is supportive of such development by proactively removing barriers to development.	Comment	Affordable housing requirements have been informed by the Council's viability evidence, which took account of policy costs and development typologies. The policy already provides an appropriate mechanism for considering viability on a site-specific basis where justified. No amendment is proposed.
1471	14139	Stanfords (Beth Deacon-Bates, Head of Planning) [1471]	Abbey Brook Development can align with LP5 in principle. As a proposed 20 dwelling allocation, the site is capable of making an appropriate contribution toward affordable housing provision as part of the Plan's wider housing delivery strategy. The Council's Sustainability Appraisal notes that LP5 is proposed to be amended so that the threshold applies to developments of 10 dwellings or more	Comment	Comment noted.

			and includes an element of pragmatism, allowing the Council to negotiate a lower level of provision in exceptional circumstances justified by case-specific evidence on viability or deliverability. That pragmatic element is welcomed.		
1647	14290	The Planning Bureau (Miss Natasha Styles, Senior Planning Associate) [1647]	(See attached document) The policy requirement raises a number of areas of concern: 1. Whether the viability of older persons housing has been tested correctly for affordable housing given the appraisals have not been published 2. Why the conclusion of the viability study has not been incorporated into the draft plan 3. Whether the PPG does anticipate that such sites will be considered at the development management stage or not given the older persons housing typology has been tested at the Local Plan stage. 4. Whether an affordable housing exemption should be incorporated into the plan for older persons housing. 5. Whether Appendix F is justified in its methodology in calculating contributions towards affordable housing.	Comment	The Council's viability evidence has informed Policy LP5 and supports the proposed affordable housing requirements. The policy already provides scope for site-specific viability considerations where justified and no amendment is proposed.
1718	14312	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning wish to object to the requirement that no single group of affordable housing will exceed ten dwellings on the basis this is an ambiguous and unworkable proposal and does not consider the practicalities of delivering affordable housing. This element should be deleted.	Object	The Council acknowledges concerns regarding the practical implementation of the requirement that no single group of affordable housing should exceed ten dwellings and will review this wording to ensure there is flexibility on smaller sites/where site constraints may not necessarily allow for such a requirement. Ultimately, this specific requirement is in place to maintain integration of affordable and market housing.
982	14422	Turley (Claire Newbury, Associate Director) [982]	It is noted that Policy LP5 now requires up to 20% affordable housing delivery on sites delivering 10 or more dwellings not within the TCBGC and the proposed Garden Villages. The Plains Farm proposals are fully viable and can contribute to the affordable housing needs of the District at policy compliant levels. Catesby also note that the policy requires 95% of affordable housing to meet Building Regulations Part M4(2) standards and 5% to meet Part M4(3) wheelchair-user standards. Whilst Catesby fully supports the delivery of accessible housing, in principle, any specific requirement for wheelchair-user dwellings must be supported by up-to-date evidence of clearly identified need and should also take into account consideration of any site specific constraints and viability. Catesby therefore recommends that the policy provides sufficient flexibility to ensure that such requirements are only applied where they are fully justified by the evidence and are deliverable.	Comment	The requirement for M4(2) and M4(3) affordable housing reflects identified needs and is supported by the Council's evidence base. Viability considerations can already be considered where appropriately evidenced and no amendment is proposed.
Community Representatives					

953	3484	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1110	3823	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We support the new requirement of 20% affordable housing on all sites of 10 or more dwellings; this is a welcome reduction from the previous 30% requirement and may allow the Council to consider some innovative ways in achieving this new target. We strongly support the text in 5.32 where: "the Council might also consider alternative approaches to the provision of affordable housing such as financial contributions towards off-site provision, the transfer of a low number of homes to the Council or a local housing trust at nominal cost or a combination of the two".	Support	Support noted.
276	3967	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	There should be a clear distinction between affordable housing and social housing, as the two are not the same. Planning conditions for 'Affordable housing' contributions should seek to include affordable housing for local people who fall just above the low income bracket which would see them qualifying for social housing, but still requiring some level of support. Such housing provisions should be for local people, with local connections, managed via housing trusts such as English Rural Housing association, particularly when developments are for 'executive homes', which risk increasing local house prices and pricing local people out of the market.	Comment	Policy LP5 seeks to secure a range of affordable housing tenures to meet identified housing needs. The detailed mix and delivery of affordable housing will be informed by the Council's housing evidence, housing register and discussions with affordable housing providers. No amendment is proposed.
Members of the Public					
1106	3943	Mr Jack Martin [1106]	While the policy aims to increase affordable housing, the 20% requirement is relatively low and may do little to meet actual local need. Allowing reductions based on viability assessments creates a clear loophole, meaning delivery could fall even further in practice. The cap of ten units per cluster may also lead to fragmented provision and limit the efficiency of managing affordable homes. Overall, the policy lacks ambition and certainty, risking too few genuinely affordable homes being delivered to address local housing pressures.	Object	The Council considers the 20% affordable housing requirement to be an appropriate and deliverable balance between meeting affordable housing needs and ensuring development remains viable, as evidenced by the Council's viability assessment. The policy also includes viability provisions to reflect national planning policy. The Council will, however, review the wording relating to the clustering of affordable housing to ensure it is practical and effective in delivery. No further amendment is proposed.
581	4109	Mrs Sally Webb [581]	Local families should come first.	Support	Comment noted.
1376	4220	Mrs Anja Newman [1376]	Council could take on affordable/Council housing to build up stock again. So many young people can't afford housing.	Comment	The Council recognises the significant need for affordable and Council housing, particularly for younger people and households unable to access the open market. Policy LP5 seeks to maximise affordable housing delivery through new development and supports the transfer of homes to the Council or its nominated partners where appropriate. However, the Local Plan is not the mechanism for requiring the Council itself to directly build housing, as this is dependent on funding availability, resources and wider housing strategies. No amendment to the policy is proposed.

Policy LP5: Affordable Housing

Summary of Representations

Representations generally expressed strong support for the revised affordable housing approach, particularly the reduction from 30% to 20% affordable housing on most qualifying sites, reflecting the findings of the Council's viability evidence and balancing affordable housing delivery with overall scheme viability. Support was also expressed for the policy's flexibility in considering viability issues and alternative delivery mechanisms such as local housing trusts. Most objections related either to viability concerns, affordable housing requirements for specialist housing and conversions, or the requirement that no single group of affordable housing should exceed ten dwellings. The Council considers the overall policy approach to be justified and supported by the evidence base, with only limited amendments proposed.

In response to representations submitted, changes to Policy LP5 have been made in the Regulation 19 version of the Local Plan. The policy wording has been amended to encourage development to distribute affordable housing through development, and that no single group of affordable housing should exceed ten dwellings. Exceptions may be given for this updated policy wording. Reference to the Essex Specialist and Supported Housing and Accommodation Needs Assessment (SSHANA) has also been added. In addition to this, changes have also been made to strengthen the policy wording with regard to accessibility standards.

Policy LP6: Rural Exception Sites

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
823	13530	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	LP6: Suggest this is strengthened to ensure rural exception housing and Gypsy/traveller sites (LP9) are: • in locations with safe, direct walking/wheeling access to services; realistically connected to public transport; • demonstrably safe in terms of highway conditions; • building on the existing LTP3 and aligning with LTP4's outcomes-based approach for rural accessibility, including safe active travel, improved public transport accessibility, and reduced need to travel by private car. Policy LP6: Rural Exception sites, p.73 Support the environmental consideration that the proposal shall have no significant material adverse impact on biodiversity and the landscape.	Comment	The policy already seeks to ensure that Rural Exception Sites are located adjacent to, or well-related to, existing villages where future occupiers can reasonably access local services and facilities. Matters relating to highway safety, accessibility, active travel and public transport connections are addressed through the development management process and are further supported by other Local Plan policies concerning sustainable transport, accessibility, infrastructure and place-making. In respect of policy LP6, the Council agrees that reference to safe and suitable access for all users would provide additional clarity and consistency with the wider Plan and Essex transport objectives (the Council will deal with this suggestion relating to the Gypsey and Traveller sites policy in the relevant area below. No other substantive amendment to the policy criteria is considered necessary.
Businesses, Landowners and Developers					
88	3847	Stanfords (Miss Mollie Foley) [88]	The response supports the principle of rural exception sites but raises concerns about Policy LP6's requirement that half of the market homes be self-build or custom-build in accordance with Policy LP7. It argues this linkage is too prescriptive, creates delivery and viability risks, and may deter landowners from bringing sites forward. The policy could undermine rather than enable affordable rural housing. The response recommends removing the cross-reference to LP7 to maintain flexibility, improve viability, and ensure the policy effectively supports delivery of needed affordable homes.	Comment	The policy seeks to strike an appropriate balance between enabling the delivery of affordable housing on rural exception sites and supporting the Council's identified need for self-build and custom-build homes in accordance with Policy LP7 and the Council's statutory duties. The proportion of market housing permitted under LP6 already provides additional flexibility beyond a traditional rural exception approach and is intended to incentivise land release whilst ensuring such schemes remain genuinely affordable-led. Viability evidence supports the approach taken and the Council is satisfied that the policy provides sufficient flexibility and that the link to policy LP7 supports delivery of multiple strategic housing objectives. No modification is proposed here in this regard.
1692	14348	Lewis & Scott Homes [1692]	We OBJECT to the restriction in this policy to allowing a maximum of one in three properties as market housing (unless self build) to incentivise landowners to release their land for development. Rural exception sites are typically smaller where viability is marginal. The approach set out in the policy will inhibit the potential for supply to come from this form of development will ultimately impact on the supply of small site windfalls that the Plan is expecting. (See attached document for proposed changes)	Object	The Council recognises that a limited proportion of market housing can assist in bringing forward rural exception schemes. However, the principal purpose of Rural Exception Sites is to deliver affordable housing to meet identified local needs. Allowing a higher proportion of market housing would risk undermining the exception site principle and could result in developments that are insufficiently focused on affordable housing delivery. The approach set out in policy LP6 has been informed by the Plan's housing evidence, viability evidence and the need to balance affordable housing delivery with landowner incentives. The Council is satisfied that the proposed allowance for market housing, together with the additional flexibility afforded through self-build/custom-build

					provision, represents an appropriate and justified approach. No modification is proposed.
1722	14396	Stanfords (Mollie Daniels) [1722]	Policy LP6 is supported in principle but the link to Policy LP7 is overly restrictive and risks undermining rural exception site delivery. Requiring half of market homes to be self/custom build introduces inflexibility, adds delivery risk and may reduce viability, particularly on small, sensitive rural sites with uncertain demand. This conflicts with the primary aim of rural exception policy—to deliver affordable housing supported by limited market provision. The requirement places undue emphasis on a specific housing type rather than local need. Removing the LP7 cross-reference would improve flexibility, viability and the effectiveness of LP6 in delivering rural affordable housing.	Comment	The requirement relating to self-build and custom-build housing reflects the Council's evidenced demand for such homes and supports the delivery of Policy LP7 alongside affordable housing objectives. The policy does not require all market housing on a Rural Exception Site to be self-build/custom-build and therefore retains a degree of flexibility whilst helping address identified housing needs. The Council does not consider that the requirement would fundamentally undermine viability or delivery, particularly given the limited scale of development envisaged under the policy. Retaining the cross-reference ensures consistency across the Local Plan and supports achievement of multiple housing objectives. No modification is proposed.
Community Representatives					
953	3485	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
258	13603	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly support the clarity made to this policy in the allocation of Gypsy and Traveller sites.	Support	Comment noted.
258	14169	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly support the clarity made to this policy in the allocation of Gypsy and Traveller sites.	Support	Comment noted.
Members of the Public					
581	4110	Mrs Sally Webb [581]	support	Support	Comment noted.

Policy LP6: Rural Exception Sites

Summary of Representations

Overall, representations were generally supportive of the principle of Rural Exception Sites as a mechanism for delivering affordable housing in rural communities. The main issues raised related to ensuring site accessibility, sustainable transport, self-build and custom-built homes, viability.

In response, changes have been made to Policy LP6 and its supporting text. The policy wording has been updated to require sites to provide safe and suitable access for all users and to be reasonably related to local services and facilities, having regard to opportunities for active and sustainable travel. The supporting text was updated to encourage safe and suitable access to sites and to give reference to Policies CP1 and CP2. Further to this, the supporting text mentions that sites should be located to provide reasonable access to facilities and services, and, wherever practicable, provide opportunities for walking, wheeling, cycling and access to public transport.

Policy LP7: Self-Build and Custom-built Homes

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
1335	4369	Affinity Water Ltd [1335]	Affinity owns the land at Mill Hill in Manningtree (Site Ref. MSA3) which is identified as medium sized allocation. The allocation of could be extended to include adjacent land to the south west off Colchester Road, which would be suitable for a small self-build development (and/or additional market/affordable housing).	Support	Site allocations are informed by the Council's evidence base and site assessment process whilst having regard to extend of the land put forward by site promotors/landowners as part of the two rounds of call for sites . While the contribution of self-build development is supported in principle, the proposed extension has not been identified through this process and is therefore not proposed for inclusion at this stage.
Businesses, Landowners and Developers					
88	3848	Stanfords (Miss Mollie Foley) [88]	The response argues that Policy LP7 is overly prescriptive and risks hindering self-build and custom-build delivery. Requiring a "bespoke architectural response" and "innovative" design is seen as subjective, inflexible, and unnecessary, conflating delivery method with design style. These expectations could impose disproportionate burdens on applicants, particularly for modest or affordable self-build homes. The policy may also create uncertainty in decision-making and deter smaller-scale proposals, undermining the sector's potential to support diverse and accessible housing opportunities.	Comment	The Council recognises the importance of maintaining flexibility and will review the wording to ensure design expectations are proportionate, clear, and consistent with wider design policies, avoiding unnecessary prescription whilst ensuring that the focus remains of delivery quality in design rather than being overly prescriptive.
1215	3912	Pigeon [1215]	Policy LP7 is supported.	Support	Noted.
1336	4338	Pigeon [1336]	Pigeon has promoted the strategic housing allocation at Site Ref. SAH6 in Alresford. The proposed development would provide up to 5 plots for self and custom build houses, and would contribute towards the supply and demand for self and custom build plots. Policy LP7 is supported. The design references, in the fifth paragraph in Policy LP7 should be deleted.	Comment	The Council will consider refining the wording to ensure it supports high-quality design without imposing undue or subjective requirements, consistent with national policy and Policy LP3.
136	4432	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	This policy will extend the choice of types of housing available in the district to meet the wide range of needs and requirements.	Support	Noted.
1422	4449	M Scott Properties Ltd (Scott Properties) [1422]	Support the Council's self-build and custom-built homes policy which is considered to be justified, effective and consistent with National Policy as set out in paragraph 36 of the NPPF 2024.	Support	Noted.
1439	13881	Catesby Estates [1439]	Catesby broadly supports the objectives of this policy, which seek to facilitate the delivery of 2% self-build and custom-build housing on proposals of 150 dwellings or more, where there is evidence of need identified through the Council's Self-Build Register.	Support	Noted.

			Catesby also welcomes the inclusion of a mechanism allowing serviced plots to revert to the open market, or be delivered as market housing, if they have not been taken up after a 12-month marketing period. This provides necessary flexibility and helps ensure the requirement does not delay housing delivery. Overall, this approach is supported as it enables the delivery of self-build opportunities while maintaining the effectiveness and deliverability of development proposals in line with the objectives of the NPPF.		
119	14061	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	The Council are proposing that 2% of plots on sites of 150 homes or more should be allocated for self-build or custom housebuilding. The evidenced used to support this is the Council's self-build register which has 156 households on it who have indicated they would like to build their own home. This list will need to be reviewed to identify whether those on the list are still looking for a plot to build their own home and have the means to do so. The Council should also ascertain the type of site that those on the list are looking for. Many of those looking to build their own home will not want a plot on a major development site and therefore a policy that seeks to provide plots in this way is unlikely to meet the needs of self-builders in Tendring. Without a thorough review this evidence cannot be relied on to justify this policy. If the policy is retained, then the marketing period before homes can be built out be the developer should be reduced to 6 months. If the Council are confident that there is demand for these plots, then a 6 month marketing period should be more than sufficient and will ensure that plots do not remain unbuilt for longer than is necessary.	Comment	The Council continues to monitor and review its Self-Build Register to ensure it remains a robust evidence base. A 12-month marketing period is considered appropriate to provide a realistic opportunity for uptake while maintaining deliverability; no change is proposed.
1643	14195	Bradfield Fruit Farm (Johnny Piper) [1643]	We support inclusion of land at and adjacent to Bradfield Fruit Farm in the Tendring Local Plan, arguing it is more sustainable, deliverable, and policy compliant than the alternative Rose site. It has accessibility, brownfield characteristics, reduced carbon impacts, deliverability, and alignment with national and local planning policy.	Support	Comment noted and addressed elsewhere including in the relevant sections of Chapter 9.
505	14232	ADP Ltd (Mr Andrew Ransome, Planning Director) [505]	This representation supports the custom and self-build policy, under Policy LP7. Policy LP7 is supported, particularly its positive and flexible approach to delivering self-build and custom-build housing across the District. Criterion (c) is especially important and should be retained. Allowing small-scale schemes directly adjacent to the development boundary of smaller rural settlements provides necessary flexibility where opportunities within settlement limits are often constrained. This reflects the reality of rural land supply and ensures the policy remains deliverable in practice. The provision supports proportionate, edge-of-settlement growth that is well-related to existing communities, rather than encouraging isolated	Support	Noted.

			development in the countryside. It also aligns with common rural settlement patterns, where linear or incremental expansion is characteristic.		
674	14260	AWG Landholdings [674]	Our client is generally supportive of Non-Strategic Policy LP7, which encourages the provision of self-build and custom-built homes. However, clarification is required in relation to the following draft wording: “The Council will encourage the provision of opportunities for constructing SelfBuild and Custom-Built Homes as part of the mix of housing on large residential developments and the one-for-one replacement of an existing dwelling, of any size, in the countryside outside of settlement development boundaries, provided the impacts of development do not conflict with other policy requirements in this Local Plan.” It is unclear whether this policy is intended to apply solely to development outside of settlement development boundaries. It would therefore be helpful for the Council to clearly distinguish the requirements that apply for self-build and custom-built homes within and outside of settlement development boundaries to avoid ambiguity and ensure that the policy is applied consistently. We reserve the right to comment further on the policy wording within future stages of Local Plan consultation.	Comment	The first paragraph of Policy LP7 is intentionally permissive in nature in line with the NPPF, and establishing in-principle support for self-build and custom-build housing in the situations described. The subsequent paragraph then turns to detail, setting out the criteria against which self build/custom build proposals will be assessed in locations not covered in the first paragraph. The policy as a whole remains permissive and enabling rather than restrictive. In terms of spatial application, the Local Plan’s overall spatial strategy—particularly Policies SPL1 and SPL2—already provides clear support for residential development, including self-build and custom-build homes, within defined settlement boundaries. As such, the distinction between development within and outside settlement boundaries is addressed through the wider policy framework. On this basis, the Council considers that the current wording is sufficiently clear and operates effectively alongside the strategic policies, and no further amendment is necessary.
1508	14282	Gladman Developments Ltd (Matthew Jones, Senior Policy & Promotions Planner) [1508]	We support this policy. Requesting 2% of large developments to be self/custom build plots is appropriate, as this is a reasonable number and does not negatively impact smaller schemes with mandatory self/custom build requirements, as the requirement is only for schemes of 150+ dwellings. This is provided that the evidence supports these figures. We also agree with the 12-month turnaround time on the Self-Build Register, with sales on the open market taking place after this period should the plot(s) not be purchased.	Support	Noted.
1722	14397	Stanfords (Mollie Daniels) [1722]	The policy aims to secure high-quality design in self/custom-build housing but is overly prescriptive and introduces unnecessary rigidity. Requiring a “bespoke architectural response” conflates delivery method with design style and imposes higher expectations than for standard housing, risking inconsistency and discouraging delivery. The emphasis on “innovation” and bespoke design introduces subjective and uncertain decision-making criteria that may not suit all contexts. This creates additional burdens, particularly for smaller or more practical schemes, and could deter applicants. Overall, the policy should be simplified to support good design without imposing disproportionate or inflexible requirements.	Comment	Noted and addressed above where similar comments are made.
982	14423	Turley (Claire Newbury, Associate	Whilst Catesby supports this provision in principle, there is some concern around the risk to delivery of sites, for example during discharge of conditions, and therefore the implications for meeting the full quantum of housing delivery required during the plan period. In	Comment	The policy includes a proportionate 2% requirement only on larger sites and incorporates a flexible mechanism allowing plots to revert to the open market after a defined marketing period. This approach is considered to appropriately balance demand and deliverability.

		Director) [982]	particular, where there is no identified interest at a particular site or location, then this approach risks parts of sites remaining undeveloped. Catesby acknowledges that the Council maintains a register to monitor local demand, and requests that interest at a specific site or location is therefore fully confirmed before applying any overarching requirement to housing sites. Catesby however welcomes the inclusion of a mechanism which allows serviced plots to revert to the open market (or be delivered as market housing) if they have not been taken up after a 12-month marketing period. This will provide the necessary flexibility to ensure that this requirement does not impede or delay housing delivery. This approach will therefore help to support the delivery of self-build opportunities whilst maintaining the overall effectiveness and deliverability of the development proposals in line with the objectives of the NPPF.		
Community Representatives					
953	3486	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
235	6841	Alresford Parish Council (Mr Matt Cooke, Alresford Parish Council Clerk) [235]	We are concerned that the Self-Build and Custom-Build allocation is being over-used, leading to ribbon development and insufficient pedestrian safety, and we urge the Plan to address these issues.	Comment	Policy LP7 does not override other Local Plan policies. Proposals must comply with design, highway safety, and spatial strategy policies to ensure development is appropriately located, well-integrated, and does not result in harmful patterns such as ribbon development.
Members of the Public					

Policy LP7: Self-Build and Custom-built Homes

Summary of Representations

Representations broadly support Policy LP7 but raise concerns around potential over-prescription around design requirements, clarity of wording, and deliverability.

Changes have been made to Policy LP7 and its supporting text in the Regulation 19 version of the Local Plan. Policy wording has been updated to require proposals to be of a high-quality design . In addition to this change, the supporting text has also been updated to reference high-quality and locally distinctive design.

Policy LP8: Backland Residential Development

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
705	4071	Mr Peter Le Grys [705]	Reference to 'long and narrow' drives should be better defined. If such drives meet highway standards and cause no impact upon local amenity, there should not be no presumption against such development.	Comment	Additional clarity is provided within the supporting text to the policy, specifically at paragraph 5.45, which explains the types of "long and narrow" driveways the policy seeks to avoid. This text also sets out the broader context and intent of the policy, namely to prevent layouts that may give rise to poor design, access, servicing, or amenity outcomes – aligned with the aims of the relevant paragraphs in the NPPF. The policy also does not establish a blanket presumption against such arrangements; rather, it seeks to ensure that proposals are assessed in context, taking into account highway standards, safety, functionality, and impacts on local amenity.
674	14261	AWG Landholdings [674]	Non-strategic Policy LP8 relates to backland residential development and sets out a series of criteria to guide development. Criterion (e) states that "the site must not be on the edge of defined settlements where likely to produce a hard urban edge or other form of development out of character in its particular setting". However, a blanket restriction preventing backland development on the edge of defined settlements is not appropriate, justified, or aligned within national policy objectives. Paragraph 124 of the NPPF (December 2024; as amended February 2025) makes clear that planning policies and decisions should promote effective use of land for development of homes and other uses. An overly rigid approach with little flexibility to backland development therefore risks undermining sustainable opportunities for small-scale residential growth. Backland development is defined within Appendix A – Glossary of Terms as "Development of land which lies generally behind the line of existing frontage development, has little or no frontage to a public highway and would constitute piecemeal development in that it does not form part of a large area allocated for development." In practice, there may be situations where existing frontage development lies at the edge of defined settlements, which may reflect the most effective and sustainable use of land. A degree of flexibility is therefore required within Non-strategic Policy LP8 to ensure that backland development is not automatically excluded in edge-of-settlement locations where it could comprise the most effective use of land.	Comment	Criterion (e) does not introduce a blanket restriction on backland development in edge-of-settlement locations. Rather, it identifies specific circumstances where such development is likely to be inappropriate, namely where it would result in a hard urban edge that would be out of character with its particular setting. The emphasis is therefore on achieving high-quality design and ensuring development responds positively to its context, rather than restricting development in principle. The policy is intentionally framed to allow for flexibility and does not preclude backland development at settlement edges where it can be demonstrated that proposals are well-designed, integrate appropriately with their surroundings, and do not result in harmful impacts. As such, the Council considers the policy to be consistent with national policy objectives to make effective use of land while safeguarding local character.

			We reserve the right to comment further on the policy wording within future stages of Local Plan consultation.		
Community Representatives					
953	3487	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
1066	3750	Mr Gavin Tuff-Lacey [1066]	Backland development must be tightly controlled. These area huge contributor to loss of rural feel of communities by enclosing existing homes.	Support	The Council agrees that backland development requires careful control. Policy LP8 is specifically intended to ensure proposals respect local character and avoid harmful impacts, including the erosion of the established rural or spacious feel of an area.
1113	3792	Mr Keith Smithard [1113]	This is exactly why the development adjacent to Branscombe Close should not take place.	Comment	This is a site-specific matter which will be considered alongside the draft allocation at Branscombe Close, including all related representations and any assessment of its compatibility with relevant policies such as LP8. It would not be appropriate to address such matters through strategic policy wording. More generally, the role of the Local Plan is to establish the policy framework for development, rather than to determine in detail whether individual sites comply with non-strategic or development management policies. Those matters are more appropriately assessed through the development management process.
616	3919	Mr Kevin Everitt [616]	Does Gutteridge Hall Lane in Weeley fall into the "Backland Residential Development" category there is no mentiion of this area in the new plan. surely this would be an opportunity for the council to include this area in the plan and have a structured development plan to improve the existing deprivation and living conditions in this area which is a constant problem and concern for the parish and local council. There appear to be open sewage and no real facilities or utilities in this area with some people just dumped and forgotten.	Comment	Policy LP8 provides criteria for assessing windfall backland proposals and does not allocate sites. The inclusion of specific sites is considered separately through the site allocation process and evidence base; this location has not been identified for allocation through that process.
616	3932	Mr Kevin Everitt [616]	Backlands not impacting on neighbouring properties, as long as there is safe access and adequate utilities and meet all planning requirements should be considered to help make up the numbers required, most people do not object to what they cant see and doesnt impact directly on them.	Comment	This aligns with the intent of Policy LP8, which allows for backland development where it can be demonstrated that there are no unacceptable impacts on residential amenity, access, servicing, or infrastructure provision.
581	4111	Mrs Sally Webb [581]	Back garden development should not be allowed, it is simply a way of making money at neighbours expense.	Object	National policy supports the efficient use of land, including windfall development such as backland schemes where appropriate. Policy LP8 provides a robust framework to ensure such development is only permitted where it is well-designed and does not result in harmful impacts.

Policy LP8: Backland Residential Development

Summary of Representations

Representations received for LP8 included a mix of support, objections, and comments from stakeholders. Comments broadly sought greater flexibility and clarity within Policy LP8, particularly in relation to “long and narrow” driveways and development at settlement edges. Other representations objected against backland development and its impact on neighbourhood properties.

No substantial changes to Policy LP8 are proposed. The Council maintains that the policy is appropriately framed to balance effective use of land with the need to protect local character, residential amenity, and design quality. Changes have been made to the supporting text of LP8 to clarify that applications to Policy LP8 will be through a proportionate, site-specific approach.

Policy LP9: Gypsy and Traveller Sites

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
1654	6679	Natural England (Jonathan Burt) [1654]	Recommend that Strategic Policy-LP9 (Gypsy and Traveller sites) require payment of the Essex Coast RAMS tariff at a rate equivalent to new C3 dwellings.	Comment	The Council has reviewed the implications of Gypsy and Traveller site provision for recreational disturbance and, where relevant, proposals will be required to comply with the Essex Coast RAMS mitigation strategy and associated requirements – which will be judged on a case by case basis. No modification is proposed.
823	13531	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	LP9b, page 80 Comment and recommended change 'Reasonable access' should be defined. E.g. for school transport purposes this is defined as two miles via a suitable walking route for pupils under the age of eight and three miles for older children.	Comment	The Council considers that the term "reasonable access" provides appropriate flexibility when assessing sites, recognising that accessibility will vary according to local circumstances and the range of services available. No modification is proposed.
148	14469	Environment Agency (Environment Agency) [148]	We recommend adding a policy criterion stating that sites must avoid areas of high flood risk (Flood Zone 3). This reflects NPPF paragraph 170, which directs development away from the highest-risk areas. Annex 3 classifies caravans, mobile and park homes as "Highly Vulnerable," and PPG guidance confirms such uses should not be permitted in Flood Zone 3. Including this criterion would provide clarity for applicants and decision-makers, and help avoid Environment Agency objections to proposals for these forms of residential development in high-risk areas. (PLEASE REFER TO ATTACHED DOCUMENT FOR REWORDING SUGGESTIONS)	Comment	Criterion (a) of Policy LP9 requires sites to avoid areas prone to flooding. In addition, national policy and guidance already restrict highly vulnerable forms of development, including Gypsy and Traveller sites, in areas at highest risk of flooding. No modification is proposed.
148	14512	Environment Agency (Environment Agency) [148]	We recommend the policy require connection to the public foul sewer wherever possible, reflecting national guidance which prioritises mains drainage. Private sewage systems should only be used where a mains connection is not feasible, as they pose greater pollution risks and are unlikely to receive permits. Lack of capacity is not sufficient justification; applicants should explore solutions to enable connection. Non-mains drainage should only be permitted where cost or practicality prevents connection. The policy could reference the drainage hierarchy in national guidance, prioritising public sewer connection above alternative options. (PLEASE SEE ATTATHCED DOCUMENT FOR FURTHER DETAILS)	Comment	The Council considers that foul drainage and utility infrastructure requirements are appropriately addressed through criterion (d) of Policy LP9 and through existing national policy and guidance. Detailed drainage arrangements will be considered through the planning application process. No modification is proposed.

Businesses, Landowners and Developers					
88	3849	Stanfords (Miss Mollie Foley) [88]	The response raises concerns about relying heavily on large strategic sites, particularly the Garden Communities, to meet Gypsy and Traveller accommodation needs, as phasing, infrastructure dependencies, and complex delivery arrangements risk delaying pitches. It notes that such sites may not provide culturally appropriate environments, unlike smaller, family-focused locations. The GTAA identifies clear pitch needs, but LP9 lacks early, deliverable supply and adequate contingency measures. Recommendations include time-bound delivery plans for existing sites, clearer phasing and serviced land at TCBGC, stronger criteria-based policy, a pipeline of small sites, and annual monitoring to maintain a five-year supply.	Comment	The Council's updated Gypsy and Traveller Accommodation Assessment and Pitch Delivery Assessment demonstrate how identified needs will be met through a combination of existing site allocations, strategic growth locations and windfall provision. The Council is satisfied that Policy LP9 provides a robust, flexible and deliverable strategy for meeting identified accommodation needs over the plan period. No modification is proposed.
1722	14398	Stanfords (Mollie Daniels) [1722]	Policy LP9 seeks to meet Traveller accommodation needs but relies too heavily on large strategic sites, creating delivery and suitability risks. The assumed provision within the Tendring–Colchester Borders Garden Community lacks clear phasing, serviced land and early delivery certainty. Overdependence on strategic allocations may fail to provide a robust early-years supply, contrary to national policy expectations. Large, master-planned sites may also conflict with cultural preferences and practical needs of Traveller communities. Greater flexibility is needed through smaller, deliverable sites and contingency options. Overall, the policy should strengthen deliverability, diversify site provision, and ensure a realistic, phased supply aligned with identified need. (See attached document for full recommendation)	Comment	The Council considers that Policy LP9 provides a balanced approach to delivery by allocating capacity on existing sites, securing longer-term provision through strategic growth locations and allowing for additional provision through criteria-based windfall proposals. The evidence base demonstrates that the identified need can be met in a deliverable manner throughout the plan period. No modification is proposed.
Community Representatives					
953	3488	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
986	3668	Mr Bradley Stokes [986]	Traveling communities bring with them crime and waste. Their lack of concern for the location they are currently in has been shown across the country with them moving on once sites have been used/filled with waste. Which then leaves the council to clean up after them.	Object	Objection noted. The Council will continue to work with Essex County Council, as the Waste Planning Authority for the district, to ensure that waste is properly managed and that all regulations regarding waste disposal are enforced.
887	3679	Ms Sarah Bishop [887]	I am totally opposed to any expansion of Woodfield Bungalow and Gutteridge Hall Lane sites.	Object	The Council recognises local concerns regarding the proposed expansion of existing Gypsy and Traveller sites. However, the Local Plan is required to identify and meet the accommodation needs of Gypsy and Traveller households in accordance with national policy and the Council's evidence base. The Council considers that the expansion of existing authorised sites represents an appropriate and sustainable means of contributing towards identified needs, making use of established sites and existing

					infrastructure. Any future development proposals would remain subject to detailed assessment against Policy LP9 and other relevant Local Plan policies to ensure that impacts are appropriately considered and mitigated. No modification is proposed.
526	3739	Mr kevin millar [526]	Essex previous plan for Gypsies and travellers said there was no need for any expansion to or an increase in sites in Tendring. The site in Weeley is not currently meeting planning rules with no reliable sewage system in place with surrounding ditches and properties experiencing sewage backing up in their baths. The site at Gutterage Hall Lane on the previous plan highlighted regular issues in enforcement. These issues continue today and until these issues are corrected the site should not be considered for expansion	Comment	The Council has completed an updated Gypsy and Traveller Accommodation Assessment (GTAA) which identifies how many Gypsy and Traveller households require pitches or plots and what types of accommodations they need. As reflected in the policy, the updated GTAA indicates a need both to expand existing sites and to provide additional new sites. Strategic Policy LP9 sets out criteria to ensure that such sites are appropriately located and well designed, provide a good standard of residential amenity, avoid harm to the environment, and have safe access to services and infrastructure.
616	3933	Mr Kevin Everitt [616]	The Gutteridge Hall Lane site needs proper deveopment on both sides of the lane, there appears to be an open sewer running through the ditch and residential caravans on the right hand side of the lane are poor quality facilities.	Object	The Council recognises local concerns regarding the proposed expansion of existing Gypsy and Traveller sites. However, the Local Plan is required to identify and meet the accommodation needs of Gypsy and Traveller households in accordance with national policy and the Council's evidence base. The Council considers that the expansion of existing authorised sites represents an appropriate and sustainable means of contributing towards identified needs, making use of established sites and existing infrastructure. Any future development proposals would remain subject to detailed assessment against Policy LP9 and other relevant Local Plan policies to ensure that impacts are appropriately considered and mitigated. No modification is proposed.
581	4112	Mrs Sally Webb [581]	There are very few nomadic travellers' who go from area to area to earn their living and I cannot think of very many sites that now use casual labour in the Tendring area. Recently there has been a small settlement in Bradfield.	Support	Noted.
457	4420	Ms Carol Bannister [457]	I object simply because the Enforcement Department has yet to solve the constant problems along Gutteridge Hall Lane, which is single track with blind bends and thus unsuitable for the amount and type of of traffic that now passes through it. For example, to the North there should be a well laid out 8-pitch Traveller site providing suitable circulation and amenity space for its residents and that is not happening. Furthermore, the caravans to the East of that should be part of the Oakleigh Holiday Park with vehicular access and egress by the railway line. Various problems also to South.	Object	Council will continue to work with Essex County Council (ECC), as the Highways and Transport Authority, to address traffic-related issues. The Council has completed an updated Gypsy and Traveller Accommodation Assessment (GTAA) which identifies how many Gypsy and Traveller households require pitches or plots and what types of accommodations they need. This includes the assessment of existing and potential sites. The updated GTAA indicates a need both to expand existing sites and to provide additional new sites. Strategic Policy LP9 sets out criteria to ensure that such sites are appropriately located and well designed, provide a good standard of residential amenity, avoid harm to the environment, and have safe access to services and infrastructure.

Policy LP9: Gypsy and Traveller Sites

Summary of Representations

Representations on Policy LP9 principally related to environmental mitigation, flood risk, drainage requirements, site accessibility, and the deliverability of the Council's strategy for meeting Gypsy and Traveller accommodation needs. Natural England raised the potential application of Essex Coast RAMS contributions; Essex County Council suggested further definition of "reasonable access"; and the Environment Agency commented on flood risk and foul drainage considerations. Developer representations questioned the reliance on strategic growth locations for longer-term provision and sought greater certainty regarding delivery and contingency arrangements.

The Council reviewed all representations alongside the updated Gypsy and Traveller Accommodation Assessment (GTAA) and the 2026 Pitch Delivery Assessment (PDA). The revised policy and supporting text were updated to provide greater clarity on the identified need, the role of existing site expansions, the contribution of the Tendring Colchester Borders Garden Community, and the provision of additional capacity through the proposed Garden Villages and windfall development. The supporting text was also expanded to explain how accommodation needs may be met through a range of delivery mechanisms, including intensification, reconfiguration and additional pitch equivalents where appropriate.

The Council concluded that Policy LP9 provides a robust, flexible and deliverable strategy for meeting identified needs over the plan period. Comments relating to RAMS, drainage, flood risk, accessibility and site-specific matters were considered adequately addressed through the revised policy wording, supporting text, associated Local Plan policies and national policy requirements. No further modifications were considered necessary in response to these representations.

Policy LP10: Care, Independent Assisted Living, Secure Institutions

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
349	4302	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	The ICB supports the need for specialist accommodation (e.g. care homes, assisted living, secure institutions) and seeks early involvement in the planning process to provide health-related input and help identify the most suitable locations, particularly to manage impacts on Primary Care Networks (PCNs). It emphasises the importance of incorporating ergonomic and accessible design principles from the outset to support residents' physical and mental health, including features such as wider doorways, accessible layouts, lifts, and facilities that enable independent living (e.g. ground-floor bathrooms). This aligns with national research and NHS objectives to enable people to remain in their own homes longer. The ICB highlights that such developments will generate additional healthcare demand, impacting existing services, and therefore must be supported by a Health Impact Assessment (HIA) with appropriate mitigation secured. To ensure this is effectively embedded in policy, the ICB requests that the policy explicitly requires all relevant proposals to comply with Policy HP1 (HIA requirement) and secure mitigation through Policy DI1.	Comment	The Council will continue to work collaboratively with the ICB to ensure that their important health-related inputs are effectively incorporated into the Local Plan process. The Council acknowledges the points raised and agrees that Policy LP10 can be strengthened by making explicit reference to the relevant requirements of Policies HP1 and DI1. This will help to ensure that proposals for specialist accommodation are appropriately supported by Health Impact Assessments and that any necessary mitigation is secured in accordance with those policies.
1654	6680	Natural England (Jonathan Burt) [1654]	Recommend that Non-strategic Policy LP10 (care, independent and assisted living accommodation) differentiate the RAMS tariff, applying no tariff for sites whose residents are unlikely to visit the coast and a reduced tariff for those that are.	Comment	The Council does not consider it appropriate to introduce a highly prescriptive approach within Policy LP10 in this regard. The applicability and level of any RAMS tariff will need to be determined on a case-by-case basis, taking into account a range of site-specific factors, including the nature of the development and likely patterns of resident behaviour. Introducing differential mechanisms within the policy could prove complex to define and implement effectively and is best covered on a case by case basis. The Council therefore considers that the current approach provides the necessary flexibility to ensure appropriate assessment and mitigation where required.
823	13532	Essex County Council (Rich Cooke, Principal Spatial	• Positive that the SSHANA is referenced in 5.52, and that LP10 recognises a range of supported and specialist housing and accommodation types. This provides a basis to align delivery with identified needs across the local plan period. • LP10 should clearly set out the need assessment data including in	Comment	In relation to design requirements, the Council considers that cross-referencing Policies HP1 and LP3 provides an appropriate and proportionate approach. Policy LP3 already sets clear expectations that all new residential development (Use Class C) complies with relevant standards, including the Essex Design Guide, and it is therefore not necessary to duplicate these requirements within LP10.

		Planner) [823]	the Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025). Setting out the scale and type of specialist and supported housing required across the different population groups over the plan period. • LP10 should set a clear expectation that all specialist and supported housing developed complies with relevant design guidance. Where affordable Extra Care housing is proposed, schemes will demonstrate compliance with the ECC Extra Care Design Guide (2023). • The section name 'Care, Independent and Assisted Living, and Secure Institutions' should change to reflect the wording in the SSHANA and to cover all accommodation types. The section should be called 'Supported and Specialist Housing and Accommodation' • Paragraph 5.55 refers to 'residential institutions' it is not clear whether this is referring to care homes or generally to supported and specialist housing and accommodation, the wording should be amended to say either care homes or supported and specialist housing and accommodation. Next Steps / Alternative Wording Developments for supported and specialist housing and accommodation must demonstrate how the proposed provision aligns with the need identified in the Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025). Where affordable Extra Care housing is proposed, schemes will demonstrate compliance with the ECC Extra Care Design Guide (2023). Supported living proposals will demonstrate compliance with the ECC Supported Living Accommodation Standards and, where relevant, the ECC Design Guide -Supported Living Accommodation for Adults with Complex Needs. All supported and specialist housing and accommodation developments will incorporate dementia-inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024) as well as demonstrating compliance with the Essex Design Guide -Inclusive Design.		However, the Council agrees that additional clarity can be beneficial and will incorporate specific references where appropriate. In particular, this will include requirements for affordable Extra Care housing to comply with the ECC Extra Care Design Guide (2023), alongside expectations for supported living schemes and dementia-inclusive design in line with relevant Essex and national guidance. The Council considers that the current policy title appropriately and accurately reflects the range of accommodation types covered and remains clear for users. Similarly, the reference to "residential institutions" aligns with Use Class C2 of the Use Classes Order and is therefore considered accurate.
88	3850	Stanfords (Miss Mollie Foley) [88]	The response welcomes LP10's broader recognition of specialist accommodation but highlights major gaps, particularly the lack of a definition for extra care housing despite an identified district shortfall. It argues the policy remains focused on traditional care	Comment	Partially agreed. The Council recognises the benefit of clarifying expectations for extra care housing and will consider proportionate refinements. However, the policy is intentionally flexible and not all suggested detail (e.g. detailed definitions or prescriptive spatial guidance)

			homes and fails to address the needs of neurodiverse people, who require supportive, low-stimulus, independence-focused environments. The response also notes the absence of spatial guidance for extra care schemes, creating uncertainty for applicants and decision-makers. It recommends defining extra care, explicitly including neurodiversity, and providing clear locational and design criteria to ensure effective delivery.		is considered necessary. Neurodiverse needs are addressed through wider design policies.
1718	14313	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning wish to support this policy and we note it is expected to be included within the mix of accommodation for the residential and mixed-use developments across the District. It would assist if it could be explicit that such uses are suitable to be accommodated on residential allocations.	Support	Agreed. The Council will consider making clear that such uses can be acceptable within residential and mixed-use allocations, where appropriate.
1692	14349	Lewis & Scott Homes [1692]	Whilst we support the principles of this policy, we OBJECT to the fact that it is heavily weighted towards the type of accommodation that addresses the most extreme needs for the older community (i.e. C2 accommodation). The plan as currently drafted fails to ensure that the full range of specialist housing for older people is catered for (see Paragraph: 010 Reference ID: 63-01020190626 of the NPPG). It overlooks the silent majority of older people that are not in sufficient need to justify a place in a care setting but are perhaps reaching an age where their existing homes will no longer be suitable for their current or future needs. The supporting text at paragraph 5.51 acknowledges the significant proportion (62%) of the population that will be 65+ by the end of the plan period. It follows, therefore, that this significant proportion of the population should be catered for in the plan. (See attached document for proposed changes)	Object	The policy already supports a range of accommodation types, but minor refinements will be considered to ensure this is clearly expressed. In addition, there are a number of other policies including the housing mix and housing needs policies, that seeks to address the group identified in the comment. No fundamental restructuring is considered necessary.
1722	14399	Stanfords (Mollie Daniels) [1722]	Policy LP10 is improved by clarifying the range of care-related uses, but remains incomplete and lacks clarity on extra-care housing. It fails to define “extra care,” creating uncertainty around classification, design, and delivery despite clear evidence of need. The policy still focuses heavily on traditional care homes, giving limited guidance on more flexible, community-based models. It also omits reference to neurodiverse needs and lacks clear spatial direction for extra-care schemes. Overall, LP10 should be strengthened by defining extra care, broadening its focus, recognising diverse needs, and providing clearer locational and design guidance.	Comment	See response raising the same, or similar point above. Partially agreed—proportionate clarification may be included, but the current flexible approach is intentional and appropriate.
Community Representatives					
953	3489	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					

580	3674	Mrs Caroline Mitchell [580]	Addressing these areas of housing need is very positive: it provides well for the future. Residential care homes and nursing homes Extra-care housing and assisted living schemes Retirement living or sheltered housing Supported living for people with disabilities or mental health needs Other housing for people with care needs (including C3(b) Use Class) Hospices and palliative care facilities	Comment	Noted.
1059	3728	Mr Matthew Sutton [1059]	The plan acknowledges that over 62% of Tendring's residents could be over 65 by 2042 and identifies a substantial shortfall in specialist accommodation. The Frinton-on-Sea area already has a significant elderly population. This demographic reality makes the absence of a specific primary healthcare commitment for this area even more acute. An ageing population requires accessible, face-to-face primary care. The plan's reference elsewhere to the NHS Digital First approach as a means of meeting primary care need is directly at odds with the profile of residents this policy acknowledges. The two positions cannot both stand.	Comment	This matter is addressed through separate health and infrastructure policies and is not specific to LP10.
1352	4041	Mrs Paula Bland [1352]	It is important to ensure that there is adequate housing for those needing care in the community.	Comment	The policy already seeks to address these needs; no change required.
581	4113	Mrs Sally Webb [581]	Ageing population needs care.	Support	Noted.
1391	4268	Mrs Laurence Dewey [1391]	It is a need.	Support	Noted.
719	14374	Mr Peter Harris [719]	Care, Independent & Assisted Living Proposed Addition to Supported Uses: "Specialist accommodation for armed forces veterans, including schemes incorporating care, rehabilitation and supported living." Rationale: Enables delivery of integrated Veteran Village models. Supports health, wellbeing and reintegration Aligns with national obligations under the Armed Forces Covenant	Comment	The Council recognises and strongly supports the provision of high-quality, specialist accommodation for armed forces veterans, including models that incorporate care, rehabilitation and supported living. The importance of meeting the diverse housing and wellbeing needs of this group, in line with the principles of the Armed Forces Covenant, is fully acknowledged. However, it is considered that the proposed forms of accommodation are already supported through the existing policy framework, which seeks to enable a broad range of care, supported and specialist housing to meet identified needs. The policies are intentionally framed to be inclusive and flexible, ensuring they can respond to the requirements of all groups requiring such provision, including veterans, without the need to single out specific cohorts. On this basis, the Council considers that a specific reference is not necessary, as the current wording is sufficiently robust to facilitate the

					delivery of appropriate schemes for armed forces veterans alongside other specialist accommodation needs.

Policy LP10: Care, Independent Assisted Living, Secure Institutions

Summary of Representations

There is broad support for Policy LP10 and its recognition of supported and specialist housing and accommodation needs across the District. Representations generally seek stronger links to the evidence base, greater clarity around health and design requirements, clearer recognition of the full range of accommodation types (including extra care housing and supported living), and more certainty regarding delivery within residential and mixed-use developments. Some respondents also advocate for a more detailed and prescriptive approach to locational, design and operational requirements. The Council considers that the overarching approach and intent of Policy LP10 remain sound and that the policy already provides a flexible framework capable of supporting a broad range of accommodation needs. However, a number of targeted amendments are proposed to provide additional clarity and strengthen links to other relevant policies, whilst avoiding unnecessary duplication or prescription.

In response to representations, changes have been made to Policy LP10 and its supporting text. The supporting text has been amended to support Specialist and Supported Housing and Accommodation across the District, as well as accessible and adaptable design principles. Policy wording has also been changed to add requirements for high-quality, safe, inclusive and accessible environments in support of adaptable design principles. A reference to the ECC Extra Care Design Guide (2023) has also been added, and further to this, text has been added to require proposals to demonstrate compliance with Policy HP1, to submit a Health Impact Assessment, and to secure any necessary mitigation in line with Policy DI1.

Policy LP11: HMO and Bedsits

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
1654	6681	Natural England (Jonathan Burt) [1654]	Recommend that Non-strategic Policy LP11 (HMOs and bedsits) also require the RAMS tariff, expressed relative to C3 dwellings.	Comment	The requirement for RAMS contributions already applies to HMOs and bedsits, with tariff payments calculated on a per additional bedroom or bedsit basis. As such, the Plan's existing approach ensures an appropriate and proportionate contribution, equivalent in effect to C3 dwellings.
148	14470	Environment Agency (Environment Agency) [148]	We recommend adding a criterion requiring that, within Flood Zones 2 and 3, HMOs or bedsits created through conversions provide habitable rooms above flood levels, with safe escape or rescue access. Lower floor communal areas may be acceptable if flood resilience measures allow rapid reoccupation. This would help prevent unsafe development, reduce flood impacts, and avoid residents' exposure to hazards, particularly at ground floor level. Directing the most vulnerable uses to the lowest-risk parts of buildings and enabling quick recovery would support the aims of NPPF paragraph 181.	Comment	The issues raised are already addressed through the Plan's existing policy framework, which includes specific, robust requirements for development within Flood Zones 2 and 3. These policies require all proposals to be supported by a site-specific Flood Risk Assessment that demonstrates, proportionately to risk, that development will be safe for its lifetime, without increasing flood risk elsewhere. In practice, this encompasses matters such as safe access and egress, the siting of habitable rooms, and the incorporation of appropriate flood mitigation and resilience measures. The approach advocated in the comment—locating more vulnerable uses in the lowest-risk parts of buildings, ensuring safe escape or rescue access, and enabling rapid reoccupation through flood-resilient design—is consistent with, and inherent to, the application of these existing requirements. Furthermore, in areas of higher risk, additional guidance is provided through adopted flood risk and resilience SPDs, which offer detailed expectations regarding design responses, including internal layout considerations and the use of resilient construction techniques. These collectively ensure that conversions to HMOs or bedsits are appropriately designed to manage flood risk, protect occupants, and minimise potential harm, including at ground floor level. On this basis, it is considered that introducing a further specific criterion is not necessary, as the Plan already provides a comprehensive and flexible framework capable of addressing the concerns raised, consistent with the aims of national policy, including NPPF paragraph 181.
Businesses, Landowners and Developers					
88	3851	Stanfords (Miss Mollie Foley) [88]	The response argues that LP11's 10% HMO/bedsit concentration threshold lacks any evidence, justification, or explanation of harm, making it arbitrary and weak in decision making. It highlights that the Council's HMO data is incomplete and inconsistent, meaning the threshold cannot be reliably or fairly applied, undermining the policy's effectiveness and leaving decisions open to challenge. The response requests evidence based justification, an updated and accurate HMO dataset, greater flexibility where data is unreliable,	Comment	The 10% concentration threshold is not arbitrary; it is carried forward from the adopted Local Plan, which was independently examined and found sound, including in respect of its approach to managing HMO concentrations and associated impacts on residential amenity and community balance. The Council maintains an active and ongoing working relationship with its HMO licensing team, and the dataset used to inform and apply Policy LP11 is regularly updated to ensure it is as accurate and robust as

			and clearer guidance on how the 100m radius is measured and what constitutes an HMO.		possible. This up-to-date information has directly informed the preparation of the emerging policy. The supporting evidence base for the policy, including data on HMO distribution and impacts, is publicly available via the Council's Local Plan evidence base. Notwithstanding this, the Council acknowledges the importance of clarity and consistency in application. As such, consideration will be given to providing clearer guidance on how the 100m radius is measured and to strengthening the definition of what constitutes an HMO for the purposes of the policy. This will help ensure the policy is applied transparently and effectively in decision-making.
1722	14400	Stanfords (Mollie Daniels) [1722]	Policy LP11 introduces a 10% HMO concentration threshold, but this lacks a clear evidence base, with no justification for the figure or its impacts, making it appear arbitrary and weak in decision-making. The threshold has also been challenged at appeal without subsequent revision. The policy relies on incomplete and inaccurate HMO data, meaning it cannot be applied consistently or fairly, undermining its effectiveness and leaving it open to challenge. Overall, LP11 should be strengthened through robust evidence, improved data, clearer definitions, and greater flexibility to ensure sound and reliable implementation.	Comment	The 10% concentration threshold is not arbitrary; it is carried forward from the adopted Local Plan, which was independently examined and found sound, including in respect of its approach to managing HMO concentrations and associated impacts on residential amenity and community balance. The Council maintains an active and ongoing working relationship with its HMO licensing team, and the dataset used to inform and apply Policy LP11 is regularly updated to ensure it is as accurate and robust as possible. This up-to-date information has directly informed the preparation of the emerging policy. The supporting evidence base for the policy, including data on HMO distribution and impacts, is publicly available via the Council's Local Plan evidence base. Notwithstanding this, the Council acknowledges the importance of clarity and consistency in application. As such, consideration has been given to providing clearer guidance on how the 100m radius is measured and the council has strengthened the definition of what constitutes an HMO for the purposes of the policy. This will help ensure the policy is applied transparently and effectively in decision-making.
Community Representatives					
953	3490	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1110	3825	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish	We strongly support Policy LP11, and the continuation of controlling the creation of HMO's through the requirement of obtaining planning permission. Since the introduction of an Article 4 Direction in 2012 there has been a marked limitation of these, which notoriously caused many anti-social behaviour issues.	Support	Comment noted.

		Councillor) [1110]			
Members of the Public					
616	3935	Mr Kevin Everitt [616]	Agree that although HMO's are not ideal they should be situated within areas with maximum and suitable facilities and amenities, and should be carefully managed and monitored to ensure landlords are not exploiting vunerable residents.	Support	Comment noted.
1352	4042	Mrs Paula Bland [1352]	HMOs and bedsits can provide affordable accommodation but they are not always healthy as they provide overcrowded accommodation that is poorly maintained. There must be strict planning rules on these and firm planning enforcement when the rules are broken.	Comment	The Council recognises that HMOs and bedsits can play an important role in providing affordable accommodation; however, it is equally important to ensure that such development delivers a suitable standard of living accommodation and does not give rise to harmful impacts. Policy LP11 adopts a relatively robust and restrictive approach compared to many other local planning authorities, reflecting clear local evidence in Tendring of the adverse effects that can arise from high concentrations of HMOs, particularly in coastal areas. In addition, standards relating to property condition, management, and occupancy levels are addressed through the Council's HMO licensing regime, which operates alongside the planning system to help prevent issues such as overcrowding and poor maintenance. The Council also has an established Planning Enforcement function and will take appropriate action where breaches of planning control occur, ensuring that approved standards and policy requirements are upheld.
581	4114	Mrs Sally Webb [581]	Sensible	Support	Noted.

Policy LP11: HMO and Bedsits

Summary of Representations

Representations for Policy LP11 express general support for the policy's intent to control HMOs, alongside concerns from some stakeholders regarding the justification and application of the 10% concentration threshold, data robustness, and clarity of definitions and methodology. Technical comments confirm that key matters (e.g. RAMS contributions and flood risk considerations) are already addressed through existing policy and guidance.

Accordingly, the updated Local Plan now provides clearer guidance in the supporting text on measuring the 100m radius and defining HMOs. The policy wording has also been amended to now strengthen expectations for HMOs and their impacts on neighbouring residents. This includes wording to encourage proposals to demonstrate suitable management arrangements with regard to communal facilities, waste storage areas and external spaces. The Council will continue to maintain and update the HMO dataset and ensure supporting evidence remains accessible.

CHAPTER 6: PROSPEROUS PLACES

Policy PP1: New Retail Development

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
823	13534	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Add the following overarching clause to the start of Section 6: "All economic, retail, tourism and employment development should build on the existing LTP3 and support the proposed Essex LTP4 transport hierarchy, prioritising walking, cycling, public transport, and reduced car dependency. Development will be required to demonstrate how it reduces trip lengths, supports mode shift, and mitigates its transport impacts, ensuring that it does not generate new peak-hour car demand." This provides a solid foundation for ensuring that the district's economic ambitions are aligned with sustainable movement principles. Strategic policy approach: Introduce a clear overarching policy requiring all major development to: • Prioritise walking, cycling and public transport • Reduce trip lengths and car use • Demonstrate mode shift and mitigation of transport impacts • Avoid generating additional peak-hour traffic Garden Villages: Require strong early transport integration, including: • Delivery of enhanced bus/RTS services from early phases • Active travel and public transport corridors to key destinations • Parking restraint and multimodal design, This aligns with supporting low-car, self-sustaining communities.	Comment	Chapter 6 focuses primarily on promoting economic growth, recognising that transport plays a key supporting role in achieving these objectives. Transport-related matters are comprehensively addressed in Chapter 8 (Connected Places), which establishes the overarching transport strategy and aligns with both LTP3 and the emerging Essex LTP4. This includes Policy CP1, which requires development to prioritise walking, cycling and public transport, and to demonstrate sustainable accessibility. Further detail is provided in the Delivering Places section, which outlines the infrastructure requirements for Garden Villages, including the phasing and delivery of transport infrastructure. Freight and logistics are addressed through a criteria-based approach to lorry parking in Policy CP2, alongside specific policy support for the Freeport under Policy SAE2, where strategic freight considerations are more appropriately dealt with. Digital connectivity is also covered through Policy CP3, while EV charging points are a requirement of building regulations. In this context, it is not considered necessary to duplicate detailed transport policies within Chapter 6 or introduce a separate freight policy. These matters are more appropriately addressed through the transport strategy and the Local Transport Plan.

			Policy alignment and integration: Strengthen references to Essex LTP4 and implementation plans, treating: • Bus priority, RTS, active travel, and highway improvements • As core economic enablers, not secondary measures. Freight and logistics (new policy gap): Introduce a dedicated policy to: • Promote zero-emission freight consolidation (Harwich/A120) • Support last-mile logistics (e-cargo bikes, EV vans) • Manage HGV routing to reduce community impacts, supporting Freeport-related growth while protecting quality of life. Community infrastructure (education, health, leisure): Require new facilities to: • Provide safe, inclusive access by sustainable modes • Integrate with LCWIP, mobility hubs and transit corridors • Include digital connectivity (full fibre/5G) • Incorporate EV charging and micro-mobility infrastructure		
Businesses, Landowners, and Developers					
Community Representatives					
953	3491	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Comments noted. National planning legislation does not enable a blanket ban on the demolition of buildings constructed prior to 1950. Decisions on demolition are considered on a case-by-case basis, taking into account heritage value, designation status, and other material planning considerations. However, the Local Plan places a strong emphasis on high-quality design and placemaking, including respect for local character and heritage. Proposals are expected to respond positively to their context, and designated heritage assets are afforded protection in line with national policy. Opportunities to reinforce local distinctiveness, including through design codes and guidance, will continue to be supported where appropriate.
Members of the Public					
1352	4044	Mrs Paula Bland [1352]	As previously stated with the advent of on line shopping retail is a dying duck apart from personal services and food buying. Out of town retail parks are all the same with no imagination. The roads accessing them are inadequate with limited parking. It will be very difficult to revive any of the	Comment	The Local Plan recognises the challenges facing town centres, particularly in the context of changing retail patterns and the growth of online shopping. In response, the Plan includes a range of retail policies and regeneration initiatives aimed at supporting the vitality and viability of town centres. This includes a “town centre first”

			town centres especially if they are allowed to continue to be dirty unkempt places where visitors do not feel safe.		approach, encouraging a mix of uses and supporting adaptation to changing economic conditions. The Council is also actively pursuing regeneration and public realm improvements, including investment supported by government funding streams, to enhance the attractiveness, safety, and overall environment of town centres. These measures are intended to help ensure that town centres remain appealing destinations for residents, businesses, and visitors.
581	4116	Mrs Sally Webb [581]	Town centre regeneration will need to be affordable for those opening new shops - not chain stores or charity shops.	Support	Comments noted. The Council recognises the importance of supporting a diverse and vibrant town centre offer, including opportunities for independent businesses. However, the planning system cannot be used to control competition or restrict the type of occupiers (e.g. limiting chain stores or charity shops). Such matters are influenced by market forces and commercial decisions rather than planning policy. The Local Plan instead seeks to create the conditions for successful town centres by supporting regeneration, improving the environment, and encouraging a broad mix of uses.
969	4401	Mr Scott Gilmour [969]	It is important to provide new retail development to accommodate the growing population of Tendring. It is also essential that they are built sustainably, while also accessible within a walkable distance from households and transit stops. There should also be sufficient provision for active travel such as abundant and safe cycle parking and other relevant infrastructure.	Support	The Council fully supports new retail development in appropriate sustainable locations. The Councill also supports the need for local community facilities and convenience stores within a walkable distance, as well safe cycle parking and supporting infrastructure.

Policy PP1: New Retail Development

Summary of Representations
Representations submitted broadly support Policy PP1. Essex County Council suggested changes to the policy wording and additions to the text. Members of the public highlighted a lack of parking and demand for in-person retail locally, which may hinder attempts to revive town centres. Another representation argued that retail must be affordable, whilst another highlighted the need for retail development to be built sustainably. Active travel provision was also mentioned by a respondent.

The Council's responses emphasise that transport matters are already comprehensively addressed elsewhere in the Local Plan, particularly in the Connected Places chapter, and therefore do not need to be repeated in Chapter 6. The Council highlights that this existing framework supports sustainable accessibility, prioritises walking, cycling and public transport, and addresses issues such as freight, lorry parking, Freeport-related logistics, digital connectivity and electric vehicle charging through other policies, guidance and regulations. On heritage and demolition, the Council notes that national legislation does not allow a blanket ban on demolishing pre-1950 buildings, but states that proposals are assessed case by case with regard to heritage value and local character, with the Local Plan placing strong emphasis on good design and protection of designated assets. In relation to town centres, the Council recognises the pressures caused by changing retail patterns and online shopping, however the Plan contains policies and regeneration measures to support vitality and viability, including a town-centre-first approach, mixed uses, and public realm improvements backed by funding opportunities. The Council acknowledges the importance of independent businesses and a vibrant mix of uses, while making clear that planning policy cannot control market competition or restrict particular occupiers such as chain stores or charity shops. Overall, the Council supports new retail development in sustainable locations and the provision of local shops and community facilities within walkable neighbourhoods, alongside safe cycling infrastructure. The supporting text for Policy PP1 has been updated to reflect updates to the Evidence Base and to emphasise the need to monitor data in the future.

Policy PP2: Retail Hierarchy

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
Community Representatives					
953	3492	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Comments noted. National planning legislation does not enable a blanket ban on the demolition of buildings constructed prior to 1950. Decisions on demolition are considered on a case-by-case basis, taking into account heritage value, designation status, and other material planning considerations. However, the Local Plan places a strong emphasis on high-quality design and placemaking, including respect for local character and heritage. Proposals are expected to respond positively to their context, and designated heritage assets are afforded protection in line with national policy. Opportunities to reinforce local distinctiveness, including through design codes and guidance, will continue to be supported where appropriate.
Members of the Public					
580	3675	Mrs Caroline Mitchell [580]	Increasing retail shops will need more parking. In Manningtree we have more homes but no more parking. Using the bus is not always the best solution. I think the same applies to most of the town centres in the list - especially as they will all be impacted by the new housing target.	Comment	Noted. The Council applies the Essex County Council Parking Standards and recognises the need to achieve an appropriate balance between private car use and public transport, particularly in locations where public transport provision is limited or where trips may involve bulky goods. The implications of growth for town centre parking will be considered as part of plan-making and future proposals.
616	3936	Mr Kevin Everitt [616]	Supported	Support	Noted.
1352	4046	Mrs Paula Bland [1352]	Before any local plan is put in place start by cleaning up the town centres. Power wash pavements, repair footpaths, empty litter bins, ensure empty shops are maintained.	Comment	Noted. The Council agrees that the maintenance of town centres is very important. Matters such as the upkeep of pavements and footpaths, litter collection and the condition of vacant units play an important role in supporting the attractiveness and vitality of town centres.

Policy PP2: Retail Hierarchy

Summary of Representations

The representations on Policy PP2 are limited and generally supportive of the retail hierarchy. Comments raise concerns that additional retail activity and housing growth could increase pressure on town centre parking, particularly in Manningtree, and that buses will not always provide a practical alternative. Other comments support the policy, seek better upkeep of town centres, including pavements, litter collection and vacant shops, and repeat wider suggestions about traditional architecture and restrictions on the demolition of older buildings.

The Council notes the support for the policy and confirms that parking matters will be considered through the EPOA Parking Guidance and through future proposals, balancing private car use with sustainable transport provision. The Council agrees that town centre maintenance is important to vitality and attractiveness. On heritage and design matters, the Council confirms that demolition cannot be subject to a blanket ban but will be assessed case by case, with the Local Plan continuing to support high-quality design, local character and heritage protection. No changes have been made to Policy PP2.

Policy PP3: Village and Neighbourhood Centres

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
1439	13882	Catesby Estates [1439]	Catesby broadly support the objectives of Draft Strategic Policy PP3 which seeks to secure small scale retail provision to serve the day-to-day needs of villages and local neighbourhoods. The Site is capable of contributing towards this objective, as the proposals allow for the potential provision of a local centre. However, it is noted that the policy includes detailed references to specific proposed neighbourhood centres, which are addressed separately in the Local Plan through site specific policies such as SAMU1, SAMU2, and SAMU5. While the overall approach of Draft Policy PP3 is welcomed, Catesby consider that the inclusion of allocation-specific requirements within this policy could create duplication and reduce policy clarity. Catesby therefore consider that Draft Strategic Policy PP3 should focus on overarching provision of village and neighbourhood centres, with site-specific infrastructure and delivery obligations addressed through the relevant allocation policies. This approach would maintain the effectiveness and clarity of the policy while remaining consistent with the NPPF.	Comment	Comments noted. It is not considered inappropriate duplication for Policy PP3 to refer to proposed neighbourhood centres where these form an integral part of strategic allocations. As agreed, the scale of development proposed in these locations justifies the provision of a neighbourhood centre, and it is appropriate that this is reflected both in Policy PP3 and in the relevant site-specific policies. This helps to ensure clarity and consistency in the Plan's overall strategy for meeting the day-to-day needs of new and existing communities.
Community Representatives					
953	3493	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Noted.
Members of the Public					
1352	4049	Mrs Paula Bland [1352]	Try to maintain local shops (which will mean affordable rents and rates) to cut down on the number of vehicle journeys.	Comment	Comments noted. The Council agrees that it would be beneficial for local shops to remain affordable to rent, as they help meet day-to-day needs locally and can reduce the need to travel. However, matters such as rent levels and business rates are outside the scope of the planning system. The Local Plan instead seeks to support the retention of local shops and services through Policy PP3 and the wider retail strategy.

581	4118	Mrs Sally Webb [581]	Village shops are necessary, however, they are often not viable. For example we have owned a village shop and rented it out for some 20 years and the rent has never been able to be increased, so not a viable investment. Had the property been a house the rent would have doubled in value. Market forces do not change. So the phrase "no longer viable" is very subjective.	Support	Comments noted. The Council agrees that village shops are essential in meeting the day-to-day needs of residents and that viability can be a challenge. Policy PP3 therefore includes criteria to protect village shops and other local services unless it can be demonstrated that they are no longer viable. Where planning applications are submitted for change of use, the Council employs independent surveyors where necessary to assess the evidence on viability. This helps ensure that decisions are based on robust and objective information.
1417	4376	Mr reginald tricker [1417]	Weeley seems to be missing as an existing village centre - it seems no less important than Arlesford or Little Clacton, for example? Shouldn't it be acknowledged and on the policies map? Even in light of the Garden Village centre, Weeley's village will need to be preserved and given an appropriate and complementary function.	Comment	Comments noted. At present, Weeley does not contain the level or concentration of shops and services that would justify its designation as a village centre within Policy PP3. However, existing retail and service uses in Weeley are protected through the criteria-based policy approach in the first part of Policy PP3, which seeks to retain local shops and services that are important to the day-to-day needs of residents. The Council agrees that this issue should be kept under review through future evidence work, including a new retail study, and can be reconsidered as part of any future review of the Local Plan.
1417	4378	Mr reginald tricker [1417]	Current historic Weeley Village should be acknowledged as a village centre, separate to the Garden Village local centre	Comment	Comments noted. The Council recognises the importance of Weeley's existing shops and services to the local community. While Weeley is not currently identified as a village centre in Policy PP3, those existing retail and service uses are protected through the criteria-based elements of the policy. The proposed neighbourhood centre associated with the Garden Village would serve a different function in meeting the needs of new development and existing residents but would not remove the need to support existing facilities in Weeley. The Council agrees that the status of Weeley should be reviewed through updated retail evidence and any future review of the Local Plan.

Policy PP3: Village and Neighbourhood Centres

Summary of Representations

The representations on Policy PP3 generally support the importance of local shops, neighbourhood centres and village services in meeting residents' day-to-day needs, while raising issues about policy clarity, the viability of village shops, affordable rents, heritage and the role of existing centres such as Weeley.

In response, the Council considers it appropriate for Policy PP3 to refer to proposed neighbourhood centres where these are integral to strategic allocations, alongside site-specific policies. The Council agrees that village shops are essential and should be protected through the criteria-based approach in PP3, with viability assessed on a robust case-by-case basis, including the use of independent surveyors where necessary. While the Council recognises the benefits of affordable rents and accessible local shops, matters such as rent levels and business rates fall outside the scope of the planning system. On heritage and design, the Council supports high-quality placemaking and local distinctiveness but notes that demolition proposals must be considered individually. In relation to Weeley, the Council does not currently consider it to have the concentration of shops and services required for formal designation as a village centre, but confirms that existing shops are protected by PP3 and agrees that the position should be reviewed through future retail evidence and any future review of the Local Plan. No changes have been made to Policy PP3.

Policy PP4: Local Impact Threshold

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
1439	13883	Catesby Estates [1439]	Catesby broadly supports the objectives of Draft Non-Strategic Policy PP4, which requires planning applications for retail, leisure and office development located outside of defined centres, and not in accordance with the Local Plan, to be supported by an impact assessment where development exceeds the thresholds set out in the draft policy. However, the draft policy should make reference to site allocations. In particular, where a site allocation requires the provision of a local centre and permits retail floorspace, the requirement to provide an impact assessment should not apply. As such, Catesby considers that the policy should be amended to reflect this.	Comment	The Council welcomes the support expressed for the policy. In relation to the proposed development of approximately 1,650 new homes at Deane's Lane and Oakley Road, where Catesby is acting as lead developer, it is acknowledged that the site will be brought forward through a comprehensive masterplanning process. The policy requirement for approximately 2 hectares of land to accommodate a neighbourhood centre, including shops, services and community facilities, is noted. The Council considers that, where an agreed masterplan has been prepared in collaboration with the Council which clearly identifies the location of the neighbourhood centre and establishes appropriate principles for retail, office, leisure and community uses, and where the scale of development is consistent with the role and function of a local centre, a retail impact assessment would not be required as it meets the policy requirements in the Local Plan. This approach reflects Policy PP4 and national policy (NPPF para. 94). As such an amendment to this policy is not needed
Community Representatives					
953	3494	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
Members of the Public					

Policy PP4: Local Impact Threshold

Summary of Representations

The comments on Policy PP4 are limited but generally supportive of the principle of requiring impact assessments for retail, leisure and office development outside defined centres where proposals exceed the local threshold. Catesby Estates supports the policy overall but suggests it should be amended to make clear that impact assessments should not be required for retail floorspace delivered as part of allocated sites where a local or neighbourhood centre is envisaged. A further comment relating to traditional design codes and demolition of pre-1950 buildings is noted but is not directly relevant to the operation of Policy PP4.

In response, the Council confirms that where retail, office, leisure and community uses come forward through an agreed masterplan for an allocated site, and are consistent with the intended role and function of a local centre, an impact assessment would not be required because the proposal would already accord with the Local Plan and national policy. The Council therefore considers that no amendment to Policy PP4 is necessary and that the policy already provides sufficient flexibility for allocated sites brought forward through the proper masterplanning process. No changes have been made to Policy PP4.

Policy PP5: Town Centre Uses

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
1110	3826	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We support the Local Plan's strategic objectives within the Prosperous Places section, particularly 6.6 that seeks to promote the vitality and viability of the town centres through the promotion of retail and other appropriate and adaptable uses, exploiting the benefit of enhanced growth of the towns whilst retaining the best and valued aspects of their existing character, as well as responding appropriately to changes in the way people enjoy shopping and other leisure activities, and competition for trade arising from other centres. The proposed Salting Quarter sited between Manningtree and Lawford will fully meet these aims.	Support	Noted.
276	3970	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	Thorpe Le Soken village centre suffers from similar constraints along its high street, which becomes increasingly narrow in places creating 'pinch points' which stop the flow of traffic when cars are parked along it. In recent years, development has been permitted in a number of the car parks serving the pubs/restaurants they were attached to, reducing the off street parking facilities for patrons of these businesses and pushing the parking on to the road, thereby increasing the on-street parking issues along Thorpe High Street. A similar scheme (New non-strategic Policy PP16) for a car park in Thorpe would help to ease such issues.	Comment	Comments noted. The Council recognises the parking pressures identified in some village and town centres. Tendring District Council applies the Essex County Council Parking Standards and will take advice from Essex County Council, as Local Highway Authority, on every development proposal. The Council will keep under review opportunities for enabling development where this is necessary to deliver infrastructure or wider public benefits, but any such approach would need to be supported by clear evidential need.

823	13535	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Retail and Town Centre Policies – Recommended Enhancements: Town centre and retail policies should embed sustainable access and place-making principles by requiring: • Movement and Place assessments for all significant proposals. • Bus priority measures where appropriate. • Public realm strategies led by walking and cycling, ensuring centres are easy and attractive to reach without a car. Comment and recommended change: ECC recommends that town centre policies incorporate an Urban Green Factor or equivalent urban greening requirement to ensure that development within centres delivers high-quality, multifunctional green infrastructure and contributes to climate resilience, biodiversity and improved public realm. quality, multifunctional green infrastructure and contributes to climate resilience, biodiversity and improved public realm. Workplace Mobility & Freight Emissions Requirements: To build on the existing LTP3 and align with LTP4 and the ECC Climate Action Plan, strategic employment allocations and large employers should be required to prepare: • Workplace Travel Plans with measurable mode share targets. • Freight and Servicing emissions Plans, including: o zero-emission last-mile operations o consolidation and micro-hub provision o EV fleet and depot charging strategies This ensures that new employment growth contributes positively to protecting and enhancing the Essex environment and support healthy communities. Workplace Travel – Required Provisions	Comment	Comments noted. The Council recognises the importance of sustainable access, active travel and high-quality public realm within town centres. These matters are addressed comprehensively in Chapter 8, Connected Places, which sets out the overarching transport strategy and explicitly references the Essex Local Transport Plan. Development proposals will continue to be considered in consultation with Essex County Council as Local Highway Authority. The Council will also consider the potential use of an Urban Green Factor, or similar approach, as part of future policy development and detailed design expectations for town centre proposals.

			For major employment development, require: • Comprehensive workplace travel planning. • Provision of cycle to work infrastructure, showers, secure cycle parking, and other facilities. • Lower parking ratios in accessible locations, particularly where RTS, bus priority corridors or high-quality active travel infrastructure are provided.		
Businesses, Landowners, and Developers					

Community Representatives					
953	3495	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
Members of the Public					
581	4119	Mrs Sally Webb [581]	Sensible	Support	Noted.
969	4404	Mr Scott Gilmour [969]	Town Centres should densify to improve resilience, allowing residents to live in close proximity to transport hubs, retail and jobs. Town Centres should also diversify the transport options available to residents in and out of town, by improving public transport and building active travel networks to facilitate convenient and accessible travel.	Support	Noted.
1457	14531	Mrs Fiona Gee [1457]	Riverside Avenue Manningtree The car park here is essential as it provides parking for the shops and services around. If that was to be lost whilst development was taking place, the businesses would be badly affected. The amount of houses proposed would strain our meagre parking provision hugely.	Comment	The concerns raised regarding the loss of car parking serving nearby shops and services are acknowledged. As a brownfield site located in a reasonably sustainable area, the Council must balance the potential loss of existing buildings, some of which are empty or underused, and its associated car parking, currently predominantly used by customers of the existing food store, against the pressing need to deliver new housing. The draft allocation seeks to ensure a suitable and compatible mix of uses by requiring the retention or re-provision of commercial facilities. This includes the successful relocation of the existing food store within the site to an appropriate location, maintaining a similar scale and function. As part of this, development proposals will need to demonstrate the provision of an appropriate and evidence-based level of car parking to serve the relocated store. Furthermore, the allocation requires development to be brought forward through a comprehensive, phased masterplan. This approach is intended to address site constraints in a coordinated manner, including the management of parking provision during construction, upon completion and indeed during the ongoing operational phases of the development. The Council will also consider strengthening the wording of the allocation to further emphasise the need to appropriately address parking impacts, including those affecting existing businesses and services during the development process.

Policy PP5: Town Centre Uses

Summary of Representations
The representations on Policy PP5 generally emphasise the importance of town centre vitality, accessibility, parking, sustainable transport and high-quality design.

In response, the Council notes that parking, access and highway matters are assessed in accordance with the EPOA Parking Guidance and with advice from Essex County Council as Local Highway Authority on every appropriate development proposal. The Council also confirms that sustainable transport measures are comprehensively addressed in Chapter 8, Connected Places, including reference to the Essex Local Transport Plan, and therefore do not need to be repeated in detail in Policy PP5. The Council will keep under review opportunities for enabling development where there is a clear evidential need to deliver supporting infrastructure or wider public benefits. In addition, the Council recognises the value of greener, better designed town centres and will consider the potential use of an Urban Green Factor, or similar approach, as part of future policy development and design guidance. Where specific redevelopment

proposals could affect existing parking serving shops and services, the Council will seek to ensure that impacts are properly assessed and managed through a comprehensive and phased approach. No changes have been made to Policy PP5.

Policy PP6: Employment Sites

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
1654	13490	Natural England (Jonathan Burt) [1654]	Brownfield / previously developed land: Section 6.53 indicates that the primary objective of this Local Plan is to support and diversify the economy while maintaining a broad balance between homes and jobs in order to achieve self -reliance. Strategic Policies PP6 and PP7 provide a strategic policy framework for achieving this, including prioritising regeneration of previously developed land. Natural England supports the aim to make the best use of suitable previously developed land (brownfield land), provided that it is not of high environmental value and represents a sustainable location. Brownfield land may have high value for invertebrates; for further information please see Brownfield Hub - Buglife.	Support	Noted.
823	13536	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Agree The Mineral and Waste Planning Authority (MWPA) welcome reference to 'sui generis' uses. There is a need to ensure that existing waste capacity can be maintained and increased. The Local Plan should therefore ensure that a sufficient range of employment land is available, including sites suitable for sui generis operations, so that vital waste-related facilities can be delivered and retained within appropriate areas. Employment Policies – Recommended Additions Employment policies should be updated to require: • Freight routing, HGV parking and A120 corridor impact mitigation. • Demonstrated connectivity to bus/RTS infrastructure, including high-frequency services. • Direct and safe active travel access (walking and cycling) to all major employment sites.	Comment	Support noted from Essex County Council. The Council provides a range of sites for designated employment uses through the Local Plan. However, sui generis uses do not necessarily fall within the definition of employment uses in the Local Plan or the NPPF and are therefore considered on a case-by-case basis through the planning application process. Encouraging and delivering sustainable transport proposals is at the heart of the Local Plan and its supporting transport evidence; however, detailed requirements regarding transport considerations are dealt with in the Connected Places chapter of the Local Plan.

			These measures ensure major employment clusters function efficiently without exacerbating congestion or car dependency.		
Businesses, Landowners, and Developers					
1422	4452	M Scott Properties Ltd (Scott Properties) [1422]	We support the Council's approach to protecting established employment sites, including the land south-west of Horsley Cross Roundabout, Clacton Road (known as Centurion Business Park) which has planning permission for B2 and B8 uses.	Support	Noted.
Community Representatives					
953	3496	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
244	13639	Ardleigh Parish Council (Ardleigh Parish) [244]	There is already a well-established employment corridor along Old Ipswich Road, with: • Existing industrial and office uses. • Approved and recently developed sites. Expanding into sensitive landscapes is therefore unnecessary and unsustainable. Request: Concentrate employment growth within existing employment areas, not new greenfield sites.	Comment	The Local Plan reflects the Employment Land Review and seeks to make provision for a range of employment sites across the District on both a quantitative and qualitative basis. While the Council recognises the importance of making best use of existing employment areas, it also considers that additional allocations are necessary to meet identified needs, support economic growth and provide choice and flexibility in the market. All allocations have been subject to a sustainability appraisal, together with environmental and landscape assessments.
Members of the Public					
526	3740	Mr kevin millar [526]	Adding a much needed employment area in Weeley will reduce growth due to the overcrowded A133 from Weeley. This road needs to be made 2 lanes before this site along with others is constructed	Comment	The proposed allocations have been considered as part of an assessment of transport implications, including highways modelling and traffic flow. Appropriate transport mitigation measures will be implemented as part of the development of allocated sites where required. Encouraging and delivering sustainable transport proposals is also at the heart of the Local Plan and the supporting transport studies. Detailed highway and access matters will continue to be considered through the planning application process in consultation with the Highway Authority.
1385	4507	Mrs Monica Kurnatowska [1385]	Tendring has limited employment opportunities and those that exist will be heavily reliant on cars which will increase private car use.	Comment	A key objective of the Local Plan is to provide additional employment opportunities across Tendring in order to support economic growth and improve the balance between homes and jobs. The Council also recognises the importance of reducing reliance on the private car and promoting sustainable transport. The proposed allocations have been informed by transport evidence and modelling; a key priority of this is the consideration and deliverability of sustainable transport measures.

Policy PP6: Employment Sites

Summary of Representations
The comments on Policy PP6 generally support the importance of providing a range of employment sites across the District, while raising issues relating to the treatment of sui generis uses, the balance between brownfield and greenfield allocations, design, landscape impact, and transport implications.

In response, the Council notes support for the overall approach and confirms that the Local Plan reflects the Employment Land Review in making allocations on both a quantitative and qualitative basis. While a range of designated employment sites is provided through the Local Plan, sui generis uses do not necessarily fall within the definition of employment uses in the Local Plan or the NPPF and are therefore considered on a case-by-case basis through the planning application process. The Council further states that all employment allocations have been subject to sustainability appraisal, together with environmental and landscape considerations, and that additional allocations are required to meet identified needs, support economic growth and provide market choice and flexibility. In relation to transport, the Council confirms that the proposed allocations have been informed by transport evidence, including highways modelling and traffic flow assessment, with appropriate mitigation to be secured where required; however, detailed transport requirements are dealt with in the Connected Places chapter of the Local Plan. Overall, the Council maintains that Policy PP6 provides an appropriate framework for meeting employment needs. The supporting text for Policy PP6 has been amended to reflect updates to the Employment Land Review, but no changes have been made to the policy wording of Policy PP6.

Policy PP6a: Extensions to Existing Employment Sites in the Countryside

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
Community Representatives					
953	3497	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
258	13604	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support this new policy that supports economic growth and employment in the countryside but also sets clear guidance as what is expected from developers.	Support	Noted.
258	14170	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support this new policy that supports economic growth and employment in the countryside but also sets clear guidance as what is expected from developers.	Support	Noted.
Members of the Public					
1352	4054	Mrs Paula Bland [1352]	Employment opportunities will be good but once again build adequate roads/junctions and parking to accommodate those going to work in these areas. They will not use public transport. Be realistic for the future not just today.	Comment	Noted. All planning applications will be subject to an assessment of the transport implications including car parking.

Policy PP6a: Extensions to Existing Employment Sites in the Countryside

Summary of Representations

The comments on Policy PP6a are limited but generally supportive of the principle of allowing extensions to existing employment sites in the countryside where these support economic growth and are subject to clear criteria. Support is expressed for the policy's role in enabling rural employment development while setting expectations for developers. Other comments highlight the need for realistic consideration of transport impacts, including road capacity, junction improvements and parking, particularly where public transport is seen as unlikely to meet workforce needs.

In response, the Council notes the supportive representations and confirms that transport implications, including car parking, will be assessed through the planning application process. Overall, the comments indicate that Policy PP6a provides an appropriate framework for balancing rural economic growth with the need to consider site-specific impacts.

Policy PP7: Employment Allocations

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
823	13533	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Recommended strengthening of the "Prosperous Places" Section as it relates to transportation. There is an opportunity to strengthen Section 6 by anchoring the delivery of Tendring's economic growth to a vision-led, mode-shift based transport strategy where development is supported by a transport system that enables the efficient movement of people and goods, reduces reliance on private car travel, and builds on the existing LTP3 and integrates fully with the proposed Essex LTP4 ("A Better Connected Essex"). To support this, ECC recommends the following inserts and policy enhancements. A. Insert a Strategic Transport & Economic Growth Statement Add the following overarching clause to the start of Section 6: "All economic, retail, tourism and employment development should build on the existing LTP3 and support the proposed Essex LTP4 transport hierarchy, prioritising walking, cycling, public transport, and reduced car dependency. Development will be required to demonstrate how it reduces trip lengths, supports mode shift, and mitigates its transport impacts, ensuring that it does not generate new peak-hour car demand." This provides a solid foundation for ensuring that the district's economic ambitions are aligned with sustainable movement principles. B. Garden Village Employment Areas – Required Transport Integration Garden Village proposals should clearly state that employment areas will be supported by: • RTS/enhanced bus service first delivery from the early phases of occupation.	Comment	Chapter 6 focuses primarily on promoting economic growth, recognising that transport plays a key supporting role in achieving these objectives. Transport-related matters are comprehensively addressed in Chapter 8 (Connected Places), which establishes the overarching transport strategy and aligns with both LTP3 and the emerging Essex LTP4. This includes Policy CP1, which requires development to prioritise walking, cycling and public transport, and to demonstrate sustainable accessibility. Further detail is provided in the Delivering Places section, which outlines the infrastructure requirements for Garden Villages, including the phasing and delivery of transport infrastructure. Freight and logistics are addressed through a criteria-based approach to lorry parking in Policy CP2, alongside specific policy support for the Freeport under Policy SAE2, where strategic freight considerations are more appropriately dealt with. Digital connectivity is also covered through Policy CP3, while EV charging points are a requirement of building regulations. In this context, it is not considered necessary to duplicate detailed transport policies within Chapter 6 or introduce a separate freight policy. These matters are more appropriately addressed through the transport strategy and the Local Transport Plan.

			• Bus/Active travel priority corridors connecting to surrounding settlements and rail stations. • Parking restraint and multimodal design, consistent with LTP4's movement hierarchy. This aligns major new communities with the long-term transport strategy and supports their role as low-car, self-sustaining places. C. Cross-References to LTP4 and the Implementation Plan The Prosperous Places Section should build on the existing LTP3 and reference the proposed Essex LTP4 ("A Better-Connected Essex"), positioning transport investment—RTS, bus priority, active travel networks, highway improvements, and demand-management as core economic enablers, not supporting afterthoughts. D. New Freight & Logistics Policy (Gap in Current LP) A dedicated freight policy could be added, building on the existing LTP3 and reflecting emerging LTP4 themes, including: • Promotion of zero-emission freight consolidation centres (Harwich and A120 corridor). • Support for last-mile logistics using e-cargo bikes and zero-emission vans within urban areas. • Strategic routing strategies to minimise HGV impacts on communities and sensitive areas. This will support Freeport-related employment growth while safeguarding local quality of life. E. Education, health, leisure • All new or enhanced community facilities (education, health, leisure) should demonstrate safe, inclusive access by walking, cycling and public transport, with links to the Local Cycling & Walking Infrastructure Plan (LCWIP), mobility hubs and RTS/bus		

			corridors, building on the existing LTP3 and consistent with Essex LTP4 and Everyone's Essex. • All new or upgraded community facilities must provide high-quality digital connectivity (full fibre/5G?ready) to support education, health, and social inclusion objectives • All new or enhanced community facilities, including education, health, leisure and cultural buildings, should look to incorporate electric vehicle (EV) charging infrastructure in accordance with the latest Essex County Council and national standards. Provision should include: o Active EV charging points for staff and visitors; o Passive provision (ducting and capacity) for future expansion; o Charging for electric bicycles and micromobility where appropriate;		
1710	13622	National Grid (Kevin Roeton, Senior Consents Manager (Onshore Planning)) [1710]	The Tendring Local Plan Regulation 18 Consultation proposes rolling forward an employment allocation, the Crown Business Centre, from the adopted Tendering Local Plan. This employment allocation is identified in Policy PP7 of both the adopted Local Plan and the Regulation 18 Consultation document. This site benefits from outline (ref. 19/01939/OUT) and reserved matters (ref. 23/01033/DETAIL) planning permission for the development of an employment site. The Norwich to Tilbury Project will oversail this proposed allocation in its northeastern corner. There is no permanent development within the site beyond this. Areas of the proposed allocation are also going to be utilised as a temporary haul route. The interaction between the site and the Project are displayed in Figure 3 below. National Grid has actively engaged with the promoters of developments to the north and south of Wick Lane near the junction with the old Ipswich	Comment	Noted.

			Road. Through those discussions modifications have been agreed to the arrangements for all developments such that co-existence is possible.		
808	14486	Ministry of Defence (Chris Waldron, DIO Assistant Safeguarding Manager) [808]	MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply (See attached document)	Comment	Comments from the MOD are welcomed. Where there are more detailed site-specific policies for the allocations, the Council will consider including safeguarding requirements as prescribed in the table, where this is considered appropriate to the policy.
166	14525	Essex Fire (Essex Fire) [166]	The development of new/ extended employment sites (places of work) also generates additional demand on ECFRS operations as follows; - Impact on ECFRS as the 'enforcing authority' under The Regulatory Reform (Fire Safety) Order 2005 – leading to an increase in the number of fire safety audits/ inspections, & additional demand for administration & infrastructure capacity to deliver this; - Impact on risk to Fire & Rescue Services - additional office and industrial activities lead to an increased risk requiring monitoring & evaluation to ensure the emergency response infrastructure is appropriate to the risk profile for the area; - Demand for additional infrastructure/ facilities in the form of new/ extended buildings/ floorspace, training facilities, equipment, & the recruitment/training of additional staff is necessitated.	Comment	Comments noted regarding the impact on infrastructure and the request for Section 106 contributions in relation to growth; the latter will be assessed against the appropriate legal tests.
Businesses, Landowners, and Developers					
1406	4345	The MacDonald Family (Ravens Green) [1406]	Our clients support the proposed allocation of employment land in Policy PP7 on the basis that it will ensure resilience, flexibility and market choice during the local plan period, promote long-term economic growth in the District and ensure employment land is integrated with and near new areas of housing, thereby encouraging sustainable patterns of commuting and modes of travel.	Support	Noted.
1409	4360	The MacDonald Family (Frating) [1409]	Our clients support the proposed allocation of employment land in Policy PP7 on the basis that it will ensure resilience, flexibility and market choice during the local plan period, promote long-term economic growth in the District and ensure employment land is integrated with and near new	Support	Noted.

			areas of housing, thereby encouraging sustainable patterns of commuting and modes of travel.		
1422	4453	M Scott Properties Ltd (Scott Properties) [1422]	We support the Council's approach setting out employment land will also be allocated in the Strategic Allocated Mixed-Use (SAMU) sites to help create balanced and sustainable communities such as at the new Garden Village of Horsley Cross. This policy is considered to be justified, effective and consistent with National Policy as set out in paragraph 36 of the NPPF 2024.	Support	Noted.
431	4454	Welbeck Strategic Land [431]	Reference to the delivery of employment land at the proposed Garden Villages at Hare Green and Horsley Cross should be deleted (see objections to Strategic Policies PL1, SAMU8 and SAMU9). In any event, it is noted that no employment or other commercial uses are included in the Local Plan Viability Assessment (January 2026) for these proposed schemes.	Object	An employment element is important as part of very large developments in order to help create a mixed and balanced community. Employment uses are considered in the viability report in Chapter 11. However, the Council will review this chapter in relation to the SAMU sites.
1713	13678	City & Country [1713]	Strategic Policy PP7 Employment Allocations allocates Land off Clacton Road/Dead Lane, Mistley for 2ha of employment land (Figure 2). The employment allocation is highlighted in purple towards the far south of the site. City & Country are in contract with Sainsburys to bring forward a supermarket on the wider site, on land immediately to the north of the employment allocation. The proposed food retail use would support a large number of jobs and would provide a vital service for the new community, allowing residents in Mistley, Lawford and Manningtree to have close access to a supermarket, rather than having to travel to further afield. Currently the food convenience store provision is underprovided for locally, with only a Tesco Express and a Co-op, along with small scale Premier stores From marketing to date, there is no demand for B2, B8, Eg(ii) and Eg (iii) employment uses on the site. In addition, situating B2 and B8 uses near residential dwellings raises concerns having regard to neighbouring residential amenity. Pre-application engagement to date with TDC officers and local stakeholders on the Sainsburys proposal has yielded positive feedback, and submission of a full application is imminent. It is therefore requested that the allocation of 2 hectares of land for B2, B8 and use classes Eg(ii) and Eg(iii) is removed from Policy PP7, given that the uses proposed are not deliverable.	Comment	The Council notes the request to delete the 2ha employment allocation at Land off Clacton Road/Dead Lane, Mistley from Strategic Policy PP7. The Council supports the deletion of this allocation on the basis that the updated employment land evidence identifies sufficient proposed employment land supply elsewhere to meet identified needs, and retention of the site for B2, B8 and Class E(g)(ii) and E(g)(iii) uses is therefore not necessary or justified. This is consistent with national planning policy, which requires local plans to be supported by proportionate evidence, to be justified and effective, and to avoid retaining allocations where there is no reasonable prospect of the land being developed for the allocated purpose. However, the Council does not support the request to introduce a new stand-alone policy or to allocate the land for an alternative food retail use at this stage. Any such proposal should instead be considered through the development management process, having regard to the relevant development plan policies and material considerations, including retail, highways, design, accessibility and residential amenity impacts.

			Further to the above, it is requested that the allocation at Land off Clacton Road/Dead Lane, Mistley, is placed into a new stand-alone policy, which reflects the updated position on the site and the proposed delivery on the site of a new food convenience store on a site of approximately 1ha. (See attached document)		
601	14020	Edward Gittins and Associates (Mr Edward Gittins, Chartered Town Planner) [601]	We support the major employment allocations at Hare Green Garden Village and the envisaged Masterplanning process.	Support	Noted.
1718	14314	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning support this policy and the allocations listed at Table 6.1. It is particularly important to provide flexibility and choice in the market to meet occupier demand, and this includes the 5.3 ha North of the A120 together with the 6.3 ha at the Harwich Valley permitted development.	Support	Noted.
1708	14430	H D Cobbald & Sons Ltd [1708]	The focus of these comments is on the employment policies following the previous submission of a site in Little Bentley for consideration as an employment allocation. The submission makes specific reference to land submitted through the Call for Sites near the village of Little Bentley, namely, the site referred to as Land at Hall Farm Business Centre, Church Road, Little Bentley, CO7 8SD (see Site Location Plan at Appendix 1). Representations have been submitted relating to this site . Please see various attached docs in support of this rep.	Comment	The focus of this representation relates to the non-allocation of a residential site. As such, these decisions are considered in the Living Places Chapter.
Community Representatives					
953	3498	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
258	13605	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support employment land being included in mixed use sites and Garden villages reducing the need to travel.	Support	Noted.

244	13645	Ardleigh Parish Council (Ardleigh Parish) [244]	Objection to 78ha Strategic Employment Allocation: The proposed 78-hectare employment site (Colliers Wood / Ardleigh area) is considered: • Excessive in scale for a rural parish • Likely to favour low-density logistics uses, delivering limited local employment • Harmful to landscape character and nearby assets such as Green Island Gardens Alternative Approach to Employment The Parish Council supports: Smaller-scale, high-quality employment development Focus on technology, research, and professional services. Higher job density and better alignment with local workforce needs Request: Reduce the scale of the allocation. Prioritise high-value employment sectors over logistics	Object	The Local Plan reflects the Employment Land Review and seeks to make provision for a range of employment sites across the District on both a quantitative and qualitative basis. While the Council recognises the importance of smaller-scale and higher-value employment development, it also considers that a range of site types and uses is necessary to meet identified needs, support economic growth and provide choice and flexibility in the market. This is particularly important to meet the high growth 'policy on' scenario within the Employment Land Review. All allocations have been subject to a sustainability appraisal, together with environmental and landscape assessments.
258	14171	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support employment land being included in mixed use sites and Garden villages reducing the need to travel.	Support	Noted.
Members of the Public					
616	3937	Mr Kevin Everitt [616]	Any business development sites must include sufficient small units to enable affordable rents with units small enough not to attract business rates. with high rent and rates small businesses have difficulty making enough money to cover their costs and providing a living wage.	Support	The Council recognises the importance of providing opportunities for small and growing businesses. However, matters such as rent levels, unit size and business rates are largely influenced by market conditions and fall outside the scope of planning policy. The Local Plan seeks to ensure a range of employment sites and premises are available across the District to provide choice and flexibility in the market.
1352	4056	Mrs Paula Bland [1352]	None of these areas are easy to access a private vehicles will be used. Ensure adequate roads and parking.	Comment	All proposals will be subject to the requirement for appropriate access and parking, which will be assessed by Essex Highways through the planning application process. The Council also recognises the importance of promoting sustainable transport options alongside the provision of employment land.

Policy PP7: Employment Allocations

Summary of Representations

The comments on Policy PP7 reflect a mixture of support for the proposed employment allocations and concerns about their scale, deliverability, site suitability, transport impacts and relationship to wider mixed-use development. Supportive representations highlight the importance of allocating a range of employment sites across the District, including within strategic mixed-use and Garden Village locations, in order to promote economic growth, provide market choice and help create balanced communities. Other comments raise issues relating to safeguarding, transport integration, the viability and market demand for particular allocations, the balance between logistics and higher-value employment uses, and the need to support smaller businesses.

In response to comments, the Council notes that transport matters are addressed comprehensively elsewhere in the Local Plan, particularly within the Connected Places chapter, and that detailed access and parking considerations will continue to be assessed through the planning application process in consultation with Essex Highways. The Council maintains that the inclusion of employment land within larger developments can play an important role in

supporting mixed and balanced communities and will review viability evidence in relation to the SAMU sites. It also considers that the Local Plan, informed by the Employment Land Review, appropriately provides for a range of site types and locations to meet identified needs, support economic growth and provide flexibility in the market. While the Council recognises the importance of opportunities for small and growing businesses, matters such as rent levels and business rates fall outside the scope of planning policy.

A specific representation seeks the deletion of the 2ha employment allocation at Land off Clacton Road/Dead Lane, Mistley from Strategic Policy PP7, citing a lack of demand for B2, B8 and Class E(g)(ii) and E(g)(iii) uses, amenity concerns arising from employment uses close to residential development, and the potential delivery of a food convenience store on the wider site. The Council notes that the original purpose of the employment allocation was to help retain local employment opportunities associated with a local employer; however, the anticipated relocation did not take place. Having regard to this, and to the updated Employment Land Review which identifies sufficient employment land supply elsewhere to meet anticipated needs, the Council supports the deletion of the allocation as its retention for the specified employment uses is no longer necessary or justified. However, the Council does not support the request to introduce a new stand-alone policy or allocate the land for an alternative food retail use at this stage. Any such proposal should instead be considered through the development management process, having regard to relevant development plan policies and other material considerations. Subject to the deletion of the Mistley allocation from Policy PP7, the Council considers that the policy provides an appropriate framework for meeting future employment needs across the District.

Policy PP8: Tourism

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
1654	6682	Natural England (Jonathan Burt) [1654]	Policy PP8 should be updated to reflect the likely significant adverse effects on the Essex Coast Habitats Sites of new tourist facilities on or close to the coast. The text of Policy PP10 in respect of consulting Natural England should be included in this policy as well, namely: Applications will only be permitted where they are in accordance with the Biodiversity Policy PPL4 in this Local Plan. Prior to submission of proposals for new or extended sites in the vicinity of designated sites (which should be taken to mean holiday parks within 2km of such sites) applicants should seek the advice of Natural England as to the likely requirements for Appropriate Assessment and the tests of the Habitats Regulations	Comment	Policy PP8 is an overarching policy encouraging tourism development in appropriate locations. It would be too onerous to require consultation with Natural England on every tourism proposal, particularly where proposals may be relatively minor. The more specific policy relating to holiday parks already contains the requirement for applicants to seek the advice of Natural England in relevant cases. Applications will in any event need to accord with Biodiversity Policy PPL4 and the requirements of the Habitats Regulations where applicable.
823	13537	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Tourism Policies – Recommended Strengthening Tourism policies should be extended to incorporate: • Seasonal public transport uplift, particularly for coastal destinations. • Visitor Travel Plans for major tourism developments. • Coastal mobility hubs to integrate rail, bus, active travel, micro-mobility, and visitor information. This ensures that increased visitor numbers are supported sustainably and without adverse congestion impacts.	Comment	The requirements for travel plans are contained in Policy CP1 and issues regarding sustainable transport are dealt with in the Connected Places chapter. Overarching support for walking, cycling and other sustainable modes is already embedded in the Local Plan, and developers will be required to provide and contribute to sustainable transport measures as part of new development where appropriate.
Businesses, Landowners, and Developers					
Community Representatives					
953	3499	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
Members of the Public					

526	3741	Mr kevin millar [526]	Tourism is an important part to the district. However with the extra housing etc being introduced to the area, the traffic queues entering and leaving Weeley due to the A133 congestion will have a negative effect. This road needs to be made a 2 lane carriageway.	Comment	The proposed allocations and wider growth strategy have been considered as part of an assessment of transport implications, including highways modelling and traffic flow. Appropriate transport mitigation measures will be implemented as part of development where required. Encouraging and delivering sustainable transport proposals is also at the heart of the Local Plan and the supporting transport studies. Detailed highway and access matters will continue to be considered through the planning application process in consultation with the Highway Authority.
1352	4059	Mrs Paula Bland [1352]	Yes tourism is very important to Tendring but building over our lovely countryside, inadequate roads, congestion will all result in the loss of tourism.	Comment	The Council recognises that protection of the environment is very important. The Local Plan seeks to protect the environment while also supporting development in appropriate locations, including tourism development where this can be achieved sustainably and without unacceptable impacts.
581	4121	Mrs Sally Webb [581]	Culture will enhance the area for everyone.	Support	Noted.
1417	4379	Mr reginald tricker [1417]	last bullet point could be better/clearer/more explicit regarding the active travel opportunities provided (and welcomed) in the text above "Promotion of the District as an area for Outdoor Activities: Work with partners to improve infrastructure and raise the profile of the District as a destination for walking, cycling, water sports, dog walking and other outdoor activities."	Comment	Comments noted. The Council agrees that walking, cycling, horse-riding and other outdoor activities are important tourism assets for the District. These forms of recreation are supported through the Local Plan and through working with partners to improve infrastructure and promote the District as a destination for outdoor activity. As such, we do not consider the text requires an amendment.

Policy PP8: Tourism

Summary of Representations

The representations on Policy PP8 generally support the importance of tourism to Tendring while raising concerns about environmental impacts, transport and congestion, and the clarity of support for outdoor and active-travel tourism. Natural England seeks stronger safeguards for development near the Essex Coast Habitats Sites, including references to Biodiversity Policy PPL4 and advice from Natural England for proposals close to designated sites. Essex County Council recommends stronger recognition of sustainable visitor access through measures such as seasonal public transport improvements, visitor travel plans and coastal mobility hubs. Public comments emphasise that tourism is a major asset for the District, but warn that congestion, inadequate roads and the loss of countryside could undermine its attractiveness, while others support culture and outdoor recreation as important parts of the visitor offer.

In response, the Council states that Policy PP8 is intended as an overarching tourism policy and should not duplicate more detailed requirements already set out elsewhere in the Local Plan. It considers that requiring consultation with Natural England on every tourism proposal would be too onerous, but confirms that more specific policies, particularly on holiday parks, already include such requirements where relevant and that all proposals must comply with Biodiversity Policy PPL4 and the Habitats Regulations where applicable. The Council also notes that sustainable transport matters, including travel plans and support for walking, cycling and other modes, are already addressed in the Connected Places chapter and Policy CP1. More generally, the Council recognises the importance of protecting the environment while supporting tourism development in appropriate locations, and confirms that transport impacts and mitigation will continue to be assessed through modelling, supporting studies and the planning application process in consultation with the Highway Authority. It also agrees that walking, cycling, horse-riding and other outdoor activities are important tourism assets, although it does not consider further amendment to the policy wording necessary.

Policy PP9: Hotels and Guesthouses

Respondent ID	Representation ID	Name/ Organisation	Supporting docs	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object Comment	Council response
Technical Stakeholders						
Businesses, Landowners, and Developers						
Community Representatives						
953	3500	Mr Community Campaigner David Barton [953]		Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
Members of the Public						
1352	4062	Mrs Paula Bland [1352]		We have a great main static caravan parks offering holiday accommodation. Do we really need any more hotels than we have already? Many are used to house those without their own home. This won't lead to more tourism but will deter tourists and locals.	Comment	Tourism is very important to the economy of Tendring. The policy seeks to protect existing hotel provision and encourage new short term accommodation provision where appropriate. Long term use of hotels as accommodation functioning more like a hostel or other non-transient residential use may amount to a material change of use requiring planning permission. This would depend on the specific facts of the case, including the nature and duration of occupation and whether the use remains consistent with the primary function of a hotel providing short-stay visitor accommodation.
581	4122	Mrs Sally Webb [581]		Hotels should be encouraged, but not for use by migrants.	Support	Noted.

Policy PP9: Hotels and Guesthouses

Summary of Representations

The comments on Policy PP9 are limited but generally support the importance of hotels and guesthouses to Tendring's visitor economy, while raising concerns about the long-term use of hotels for non-tourism accommodation. Public comments question whether additional hotel provision is needed given the existing holiday accommodation offer, and express concern that use of hotels for longer-term accommodation could undermine their tourism function and affect perceptions of the area.

In response, the Council confirms that tourism is very important to the local economy and that the policy seeks to protect existing hotels and support new short-term hotel accommodation provision where appropriate. The Council also clarifies that long-term use of hotels as accommodation functioning more like a hostel or other non-transient residential use may amount to a material change of use requiring planning permission, depending on the nature and duration of occupation and whether the use remains consistent with the primary function of a hotel providing short-stay visitor accommodation. Overall, the Council maintains that Policy PP9 provides an appropriate framework for safeguarding hotel stock in support of tourism while allowing planning controls to address inappropriate long-term alternative use. No changes have been made to the policy wording or supporting text of Policy PP9.

Policy PP10: Camping and Touring Caravan Sites

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
926	3858	National Landscape Office (Beverley McClean, National Landscape Planning Officer) [926]	New camping and caravan site provision or the extension of existing sites within or within the setting of the National Landscapes in the District, particularly the Suffolk& Essex Coast & Heaths, have the potential to negatively impact the natural beauty of these areas. National Landscape are attractive locations for camping and touring caravan sites (including motor homes). Policy PP10 includes advisory advice for camping and caravan proposals within 2km of designated wildlife sites but is silent in relation to issues to be addressed for camping and caravan proposals in National Landscapes. The policy should be amended to address this	Comment	Comments noted. The Council agrees that proposals for new or extended camping and touring caravan sites within or affecting the setting of National Landscapes have the potential to affect natural beauty and landscape character. The policy will therefore be amended to include an explicit reference to National Landscapes. This will ensure that the policy more clearly reflects the importance of conserving and enhancing designated landscapes, whilst continuing to assess proposals on a case-by-case basis in light of their location, scale and potential impacts.
1654	6683	Natural England (Jonathan Burt) [1654]	Support for using either the current?2?km or the forthcoming?1.5?km coastal buffer for Policy?PP10 (Camping and caravan sites).	Support	The Council welcomes Natural England's support for the use of a coastal buffer in relation to Policy PP10. The policy is intended to ensure that proposals close to designated coastal habitats are appropriately considered in light of potential impacts on those sites. The Council will continue to review the detailed wording of the policy, including the reference to the coastal buffer, in light of the latest available evidence and advice.
148	14471	Environment Agency (Environment Agency) [148]	The Council should specify the relevant flood risk tests within the policy. It is suggested that the wording refers explicitly to the Sequential and Exception Tests, and to warning and evacuation plan requirements for sites in flood risk areas, when supporting proposals for new or extended camping and touring caravan/motorhome sites. It should also be noted, in line with NPPF footnote 62, that changes of use to caravan, camping, chalet, mobile or park home sites still require application of the Sequential Test in flood risk areas, and this should be clarified in supporting text. (PLEASE REFER TO ATTACHED DOCUMENT FOR REWORDING SUGGESTIONS)	Comment	Comments noted. Flood risk is already explicitly identified as a consideration within Policy PP10 and is addressed in detail elsewhere in the Local Plan through Policy PPL1. In this context, it is not considered necessary for Policy PP10 to repeat the full range of national policy tests and requirements relating to flood risk, including the Sequential and Exception Tests and matters such as evacuation planning, as these are more appropriately dealt with through the overarching flood risk policy and national policy and guidance. Proposals for new or extended camping and touring caravan sites in areas at risk of flooding will therefore continue to be assessed against Policy PPL1 and all other relevant national and local policy requirements
Businesses, Landowners, and Developers					
Community Representatives					
953	3501	Mr Community Campaigner David Barton [953]	-Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
Members of the Public					

581	4124	Mrs Sally Webb [581]	There are plenty of mobile home sites in the area. Wild camping should be encouraged.	Object	The Council recognises that there is already a significant amount of static caravan and holiday park accommodation in the District. Policy PP10 is intended to provide a framework for considering proposals for new or extended camping and touring caravan sites on their planning merits. In relation to wild camping, this is not something that planning policy is intended to encourage. Camping without the permission of the landowner can amount to trespass, whereas camping on land with the landowner's permission or on official campsites is lawful. The purpose of Policy PP10 is therefore to manage appropriate forms of camping and touring caravan development through the planning system, rather than to promote informal camping activity.

Policy PP10: Camping and Touring Caravan Sites

Summary of Representations

The representations on Policy PP10 focus on the environmental, landscape and flood risk implications of new or extended camping and touring caravan sites, together with broader questions about the need for additional provision. Technical stakeholders support stronger safeguards where proposals could affect designated coastal habitats, National Landscapes and areas at risk of flooding. In particular, comments seek clearer reference to National Landscapes, continued use of a coastal buffer in relation to designated sites, and more explicit reference to flood risk testing. Public comments note that there is already a substantial amount of static caravan and holiday accommodation in the District and suggest that informal or wild camping should be encouraged instead of additional formal provision.

In response, the Council agrees that Policy PP10 should be amended to include an explicit reference to National Landscapes where relevant, and it welcomes Natural England's support for the coastal buffer approach. However, it considers that flood risk is already explicitly identified in Policy PP10 and addressed in detail through Policy PPL1, so it is not necessary to repeat the full range of national flood risk tests within this policy. The Council also explains that Policy PP10 is intended to provide a planning framework for assessing formal camping and touring caravan proposals on their merits, rather than to encourage wild camping. It notes that camping without landowner permission can amount to trespass, whereas camping with permission or on official campsites is lawful. Overall, the Council maintains that Policy PP10 provides an appropriate basis for supporting suitable camping and touring caravan development while safeguarding environmental, landscape and flood risk interests. No changes have been made to policy wording or the supporting text of Policy PP10.

Policy PP11: Holiday Parks

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/Comment	Council response
Technical Stakeholders					
926	3859	National Landscape Office (Beverley McClean, National Landscape Planning Officer) [926]	As per Policy PP10, Policy PP11 is silent in relation to holiday park and a potential change of use within or within the setting to the National Landscapes. Policy PP11 advises on an approach for sites close to designated sites (wildlife) but no similar approach is set should a similar situation arise in or close to National landscape boundaries. The policy should be amended to address this issue		The Council agrees that Policy PP11 should more clearly address the potential impacts of development within or affecting the setting of National Landscapes. The policy will therefore be amended to include an explicit reference to National Landscapes and to Policy PPL3. This will ensure that proposals are properly assessed in respect of their potential impact on landscape character, natural beauty and scenic quality.
1654	13450	Natural England (Jonathan Burt) [1654]	We are pleased to see that Policy PP10 includes a requirement to seek the advice of Natural England for any new camping or caravan site proposals within 2km of the coast, and we reiterate our comment above re the use of a 1.5 or 2km buffer.		The Council welcomes Natural England's support for the policy approach, including the provisions relating to development in proximity to designated coastal habitats and the use of an appropriate coastal buffer. These safeguards will continue to ensure that proposals are considered in accordance with Biodiversity Policy PPL4 and the Habitats Regulations where applicable.
148	14472	Environment Agency (Environment Agency) [148]	The third bullet point should be amended to require that residential proposals provide safe, flood- and climate-resilient, and acceptable living conditions, reflecting the risks affecting many holiday parks. The policy should also specify the Sequential and Exception Tests, and evacuation requirements for sites in flood risk areas, when supporting extensions and improvements. Support is given to encouraging relocation of chalet parks away from flood risk, aligning with NPPF paragraphs 170 and 172(d). Support is also given to occupancy restrictions limiting use to certain periods, helping reduce flood risk exposure and potential displacement of residents. (PLEASE REFER TO ATTACHED DOCUMENT FOR REWORDING SUGEESTIONS)		Flood risk is explicitly identified as a consideration within Policy PP11; however, this matter is addressed comprehensively elsewhere in the Local Plan, particularly through Policy PPL1. Proposals will therefore be assessed against the full range of national and local flood risk policy requirements, including the Sequential and Exception Tests where applicable. In this context, it is not considered necessary to duplicate detailed flood risk policy requirements within Policy PP11.
Businesses, Landowners, and Developers					
569	14115	Tingdene Group (Mrs Bernadette Owens, Planning Manager) [569]	It was encouraging to see through the initial consultation on the Local Plan Review that the Council would be undertaking a review of holiday parks and 'safeguarded sites' and this company made representations on the matter. Unfortunately, this review does not appear to have been a thorough one as the designation of the Sacketts Grove/Saddlebrook Chase/Sandpiper		The Council has reviewed the Holiday Park Study (2020) and considers that it remains relevant and up to date in supporting the Local Plan's approach. The study highlights the significant contribution of the holiday park sector to the local economy and underpins the need to safeguard these sites. While the Council may review certain aspects of this evidence in the future, any such review would take place outside of the Local Plan timetable.

			Gardens caravan parks remains as previously designated - as a safeguarded site. This is an issue because the Sacketts Grove and Sandpiper Gardens sites are residential park home sites and have been operating lawfully as such for some time.		
Community Representatives					
953	3502	Mr Community Campaigner David Barton [953]	-		Noted.
Members of the Public					
457	4464	Ms Carol Bannister [457]	Oakleigh Holiday Park appears not to have been completed and what should be its final section, running alongside part of Gutteridge Hall Lane, and having its only vehicular access and egress by the railway line, contains a mixture of caravans for residential use, which is surely unauthorised. This simply adds to the awful issues (including flooding, sanitation and drainage problems) that occur along the lane and also make life hell for some members of the settled community living nearby. When I moved to Weeley in [redacted] 2007 the then exquisite lane was considered to be the jewel in Weeley's crown!		Comments relating to Oakleigh Holiday Park are acknowledged. Matters relating to the operation and use of individual sites, including any potential unauthorised uses or localised impacts, are considered on a case-by-case basis through the planning application and enforcement processes, where appropriate.
719	14377	Mr Peter Harris [719]	Proposed Amendment:Allow, where supported by evidence and appropriate location: "Mixed-use park developments incorporating both holiday accommodation and permanent residential park homes." Rationale: Supports tourism growth and year-round economic activity Provides affordable and flexible housing options. Enables rapid deployment of accommodation. Reduces reliance on costly temporary housing solutions	.	The Council recognises that limited flexibility may be appropriate in certain circumstances to support the long-term viability of holiday parks. The supporting text to Policy PP11 already provides for this by stating that, where parks are proposed to be expanded, an element of park home provision may be acceptable where it supports overall viability and an appropriate balance is maintained. This ensures that the focus remains firmly on tourism uses, while allowing flexibility where justified and subject to other policy requirements, including those relating to flood risk, quality, infrastructure provision and sustainability

Policy PP11: Holiday Parks

Summary of Representations

The representations on Policy PP11 generally support the importance of the holiday park sector to Tendring's tourism economy while raising issues relating to landscape impact, flood risk, the role of supporting evidence, and the potential for mixed-use development. Concerns are expressed about the need to explicitly address impacts on National Landscapes and to ensure appropriate consideration of flood risk, particularly in vulnerable locations.

In response, the Council confirms that the policy will be amended to include a clear reference to National Landscapes and Policy PPL3, ensuring that landscape impacts are fully considered. The Council also acknowledges support from Natural England for the policy approach and confirms that environmental safeguards will continue to apply in accordance with biodiversity policies and relevant legislation. With regard to flood risk, the Council notes that this is

already explicitly identified as a consideration within Policy PP11 and is addressed comprehensively through Policy PPL1. As such, it is not necessary to duplicate detailed flood risk requirements within this policy. The Council has reviewed the Holiday Park Study (2020) and considers it remains relevant and up to date, recognising the significant contribution of the holiday park sector to the local economy and the need to safeguard these sites. While aspects of the study may be reviewed in the future, this would take place outside the Local Plan timetable.

The Council acknowledges comments relating to individual sites, including Oakleigh Holiday Park, and confirms that such matters are considered on a case-by-case basis through the planning application and enforcement processes. In relation to the potential for mixed-use park developments, the Council highlights that the supporting text to Policy PP11 already allows for a degree of flexibility, enabling limited park home provision where this supports viability, provided that the primary focus remains on tourism and that all other policy requirements are satisfied. Overall, the Council considers that, with the proposed amendment, Policy PP11 provides an appropriate and balanced framework for supporting a vital sector of the local economy while ensuring environmental and amenity considerations are properly addressed.

Policy PP12: Improving Education and Skills

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
791	3714	Sport England (Mr Roy Warren, Planning Manager) [791]	Indoor and outdoor sports facilities on education sites make a significant contribution to meeting the community's indoor and outdoor sports facilities in Tendring district and this has been evidenced in the Council's Playing Pitch Strategy and Leisure Facilities Strategy. In relation to the first part of the policy with regard to new education facilities it is therefore requested that the policy is amended to expect new education facilities to be designed to support community use outside of educational hours and that community use agreements will be expected to secure community access over a long term period	Comment	The Council accepts Sport England's suggested amendment. New education facilities can make an important contribution to meeting local indoor and outdoor sports needs, and it is appropriate that they are designed to support community use outside of educational hours where feasible. The Council also agrees that community use agreements may be appropriate to secure long-term access where justified.
349	4303	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	The new Essex ICB (as of April 1st) would appreciate being included as a key partner in the improving education and skills. The ICB has a large number of training services to help train and educate people into joining the NHS and is one of the local authorities' main employers. The ICB is also involved in helping finding employment outside of the NHS through a number of neighbourhood employment and training programmes, as employment is a key wider determinant of health and wellbeing.	Comment	The Council welcomes the support and comments from Suffolk and North East Essex ICB. The ICB is recognised as an important partner in supporting education, training and employment pathways, including within the health sector and through wider programmes linked to wellbeing and economic opportunity. The Council will ensure the ICB is included in future discussions where relevant.
1653	13449	Suffolk County Council (Georgia Teague) [1653]	Any development proposal near the border with Suffolk should include consideration as to whether or not any resulting demand for school places will result in demand being placed upon Suffolk schools. In rare circumstances, developer contributions may be required. Please see the Section 106 Developer's Guide to Infrastructure Contributions in Suffolk1 for further information on the county council's approach to seeking education and other infrastructure contributions.	Comment	Comments noted. The Council recognises that development close to the Suffolk border may in some cases give rise to impacts on education provision in Suffolk. Any developer contributions sought would need to be justified on the basis of evidence and must meet the relevant legal tests for planning obligations.
823	13538	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Comment and recommended change This policy is broadly supported, subject to above comment regarding HP2. For the avoidance of doubt impacts, including those on SEND provision, must be mitigated in line with the ECC Developers' Guide to Infrastructure Contributions. The policy should also recognise the importance of	Comment	The Council notes Essex County Council's comments. Paragraph 6.85 already explains the Council's approach to Employment and Skills Plans and Local Labour Agreements in sufficient detail, having regard to the Essex County Council Developers' Guide to Infrastructure Contributions. To impose more onerous policy requirements in the Local Plan would reduce flexibility. Matters relating to detailed design and safety around schools are addressed elsewhere in the Plan, including Policies SPL3 and LP4. In relation to infrastructure contributions, all Section 106 obligations must be fair, directly related to the development, and meet the relevant legal tests.

			the environment around schools in keeping children safe and enhancing the quality of education. Specific examples of measures that should be considered are set out on page 44 of the ECC Developers' Guide. 6.85 ECC suggest rewording this paragraph in line with section 5.6 of ECC's Developers' Guide to Infrastructure Contributions.		
Businesses, Landowners, and Developers					
1462	4500	Latimer (Tendring Colchester Borders Garden Community) Developments Limited [1462]	The following amendment is requested to align the Policy with the adopted DPD, which requires the provision of land for sports/leisure use, to support the University's expansion, rather than any requirement for academic expansion: "The Council will support proposals that will result in new, expanded or improved education facilities and facilities for vocational training, particularly in the growing care and assisted living and renewable energy sectors."	Object	The Council does not consider this amendment necessary. The Tendring Colchester Borders Garden Community DPD contains site-specific policy requirements, whereas Policy PP12 provides general support for the expansion of education and skills facilities (including the Garden Community), in appropriate locations associated with major growth.
1439	13884	Catesby Estates [1439]	Catesby broadly support the objectives of Draft Strategic Policy PP12 which seek to improve education and skills through the delivery of new and improved education facilities. The Site is capable of contributing towards these objectives and, subject to engagement with Essex County Council could potentially accommodate a primary school if required as part of a comprehensive development. However, it is important that any developer contributions sought towards education provision are proportionate to the scale and impact of development and do not result in duplication of infrastructure provision. For example, where a development provides land or facilities for a primary school on-site, additional financial contributions towards the same type of education provision should not be required. This approach would ensure that planning obligations remain fairly and reasonably related in scale and kind to the development and consistent with the approach set out in the NPPF.	Comment	Comments noted. The Council agrees that any planning obligations sought towards education provision must be fair, proportionate and directly related to the development. Where land or facilities are provided on-site to meet identified education needs, any further contribution requirements would need to avoid duplication and satisfy the relevant legal tests.
1659	14286	Colne Medical Centre	Policy PP12 (Improving Education and Skills) and associated infrastructure policies emphasise the	Comment	Comments noted. Infrastructure provision is addressed through Policy DI1 and related supporting text, which specifically recognises the importance of healthcare infrastructure, including GP surgeries. The

		(Louise Weston, Assistant Practice Manager) [1659]	need for adequate supporting infrastructure alongside new development; this principle equally applies to healthcare provision, which has not been adequately addressed.		Council will continue to consider healthcare requirements alongside other infrastructure needs through the plan-making and development management process.
Community Representatives					
953	3503	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
Members of the Public					
1059	3729	Mr Matthew Sutton [1059]	Policy PP12 states that permission will not be granted unless education impacts can be addressed at the developer's cost. Site allocation policies for Kirby Cross and Walton refer only generically to contributions that "may include education provision" - weaker language that provides no assurance. I ask the Council to apply PP12 consistently by requiring a specific Education Infrastructure Assessment for each allocation of 50 or more dwellings in this area, with results published in the Infrastructure Delivery Plan.	Object	Noted. This requirement has been assessed in the updated Infrastructure Delivery Plan. The Infrastructure Delivery Plan (IDP), prepared with Essex County Council, identifies the education infrastructure required to support growth in the Frinton, Walton and Kirby area, including Site SAH2 at Kirby Cross, and confirms the need for contributions towards Early Years, Primary, Secondary, Post-16 and SEND provision.
581	4125	Mrs Sally Webb [581]	Any extra encouragement for young people to enter the work chain should be encouraged with apprenticeships given financial incentives to employers.	Support	Noted.

Policy PP12: Improving Education and Skills

Summary of Representations

The representations on Policy PP12 generally support the objective of improving education and skills, while raising issues relating to sports provision on education sites, partnership working with the NHS and other agencies, cross-border education impacts, developer contributions, local labour agreements, healthcare infrastructure and the relationship between this policy and site-specific requirements in the Garden Community DPD.

In response, the Council accepts Sport England's suggested amendment in relation to community use of sports facilities and welcomes the support of Suffolk and North East Essex ICB, confirming that the ICB will be included in future discussions where relevant. The Council also acknowledges that development near the Suffolk border may in some cases have implications for education provision in Suffolk, but confirms that any contributions sought must be justified by evidence and satisfy the relevant legal tests. The Council notes Essex County Council's comments on Employment and Skills Plans, school design and infrastructure mitigation, but considers that paragraph 6.85 already provides sufficient explanation and that more onerous policy wording would reduce flexibility. Detailed matters of design and safety are dealt with elsewhere in the Plan, including Policies SPL3 and LP4, while wider infrastructure needs, including healthcare provision such as GP surgeries, are addressed through Policy DI1 and related supporting text. The Council also agrees that infrastructure requirements should be assessed within the IDP and planning obligations for education and other infrastructure must remain fair, proportionate, directly related to development and compliant with the legal tests. In relation to suggested wording changes from Latimer, the Council does not consider amendment necessary, as the TCBGC Garden Community DPD deals with site-specific requirements whereas Policy PP12 provides broader support for the expansion and improvement of education and skills facilities. Overall, the Council considers that Policy PP12 provides an appropriate strategic framework for supporting education, training and related infrastructure, while allowing detailed provision to be guided by identified need through the Infrastructure Delivery Plan and relevant site-specific policies.

Policy PP13: The Rural Economy

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
849	13587	NHS Property Services Ltd (NHS Property Services) [849]	NHSPS welcomes the recognition of key worker homes within specialist affordable/market homes in supporting paragraph 5.28 for Strategic Policy LP5 (Affordable Housing), and the inclusion of key workers' dwellings within Strategic Policy PP15(c) with regards to development outside of defined Settlement Development Boundaries, in line with our previous representation at early Regulation 18 stage (2025). To support the implementation of these policies, we recommend that the Council: • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.	Comment	Noted.
Businesses, Landowners, and Developers					
Community Representatives					
953	3504	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
Members of the Public					
581	4127	Mrs Sally Webb [581]	We are traditionally a rural economy and this should be respected and encouraged; however putting huge warehouses over farmland if approved should be subject to business rates.	Support	Comments noted. Agricultural buildings used solely for farming are exempt from business rates, while those used for non-agricultural or mixed commercial purposes (e.g. warehouses, offices) may be liable. Business rates are governed by national legislation and fall outside the planning system. The Local Plan instead focuses on managing appropriate rural development through planning policy.

Policy PP13: The Rural Economy

Summary of Representations

The representations on Policy PP13 raise a limited range of issues. NHS Property Services emphasises the importance of supporting key worker housing, particularly for NHS staff, and recommends closer engagement with health partners and stronger recognition of these needs within the evidence base and site selection. A further representation raises general concerns relating to design and the demolition of older buildings. Another comment supports the principle of a strong rural economy but expresses concern about the development of large non-agricultural buildings, such as warehouses, on farmland and suggests these should be subject to business rates.

In response, the Council notes the comments from NHS Property Services and acknowledges the importance of working with relevant partners and considering key worker housing needs where appropriate. The design-related comment is also noted. In relation to business rates, the Council clarifies that these matters are governed by national legislation rather than planning policy, with agricultural buildings used solely for farming generally exempt and non-agricultural or mixed-use buildings potentially liable. Overall, the Council maintains that Policy PP13 provides an appropriate framework for supporting the rural economy, with matters such as taxation falling outside the scope of the Local Plan. No changes have been made to Policy PP13 or its supporting text.

Policy PP14: Priority Areas for Regeneration

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
Community Representatives					
953	3505	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
Members of the Public					

Policy PP14: Priority Areas for Regeneration

Summary of Representations

The Council notes the absence of significant objections and considers that Policy PP14 provides an appropriate framework for guiding regeneration across identified priority areas. The Council maintains that the policy is sound and does not require amendment, reflecting general support or acceptance of its overall approach.

Policy PP15: Walton Mere

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
1654	6684	Natural England (Jonathan Burt) [1654]	We are pleased to see a reference to the Essex Coast Recreational Disturbance Avoidance Mitigation Strategy. We would advise adding the words 'and any subsequent updated or successor strategy' – not just for this policy, but anywhere in the draft Local Plan where the RAMS strategy is referenced.	Comment	The Council welcomes the comments from Natural England and agrees that Policy PP15 should be strengthened accordingly.
823	13539	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Comment and recommended change ECC welcomes the policy's commitment to delivering Biodiversity Net Gain (BNG) within Walton Mere and supporting nature recovery through the creation of new saltmarsh habitat and other ecological enhancements. However, we recommend that the policy also makes reference to the Essex Local Nature Recovery Strategy (LNRS), given that the Walton Mere area aligns with LNRS identified opportunities for coastal habitat creation and strengthened ecological connectivity. Including this reference would ensure the scheme contributes fully to strategic nature recovery priorities.	Comment	The policy will be amended to include reference to the Local Nature Recovery Strategy (LNRS), ensuring that proposals for Walton Mere are aligned with wider objectives for biodiversity enhancement and nature recovery.
148	14474	Environment Agency (Environment Agency) [148]	The Council's proposal to include floating homes and houseboats to support the Mere restoration scheme will need to satisfy the Sequential and Exception Tests, and an updated SFRA should clarify Flood Zones 3a and 3b. Floating homes are "more vulnerable" residential uses and are not appropriate in Flood Zone 3b, while only navigable houseboats may be considered water-compatible. As the Mere is likely functional floodplain, the SFRA should define flood zones in agreement with the Environment Agency. The proposal may conflict with the Shoreline Management Plan, though further discussion with the Council is welcomed.	Comment	The Council confirms that any residential development proposed at Walton Mere will be subject to the relevant flood risk policy requirements of the Local Plan and the provisions of the National Planning Policy Framework (NPPF). This will ensure that all proposals are appropriately assessed in terms of their safety and overall compliance with national and local policy

Businesses, Landowners, and Developers					
Community Representatives					
953	3506	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Noted.
258	13606	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support this new policy for Walton Mere.	Support	Noted.
258	14172	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support this new policy for Walton Mere.	Support	Noted.
Members of the Public					
581	4128	Mrs Sally Webb [581]	Sounds marvellous	Support	Noted.

Policy PP15: Walton Mere

Summary of Representations

Comments on Policy PP15 are generally supportive, particularly in relation to the policy's biodiversity, habitat restoration and nature recovery objectives at Walton Mere. Natural England supports the reference to the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy, but suggests the policy should also refer to any future updated or successor strategy. Essex County Council likewise supports the ecological ambitions of the policy and recommends that it should also reference the Essex Local Nature Recovery Strategy to strengthen alignment with wider biodiversity and habitat recovery priorities.

In response, the Council has strengthened the policy by adding references to both successor RAMS strategies and the Local Nature Recovery Strategy. The Environment Agency raises concerns about flood risk in relation to floating homes and houseboats, including the need for Sequential and Exception Tests and clarification of flood zones, but the Council states that any residential development at Walton Mere will be assessed against the relevant national and local flood risk policies. Overall, the Council supports refining the wording of PP15 while maintaining the policy's overall approach and objectives.

Policy PP16: St Osyth Car Park

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
1654	6685	Natural England (Jonathan Burt) [1654]	Policy PP16 (St Osyth car park) could cause 'alone' impacts on the Colne Estuary SPA; any associated residential development should provide at least 8ha of accessible seminatural greenspace per1000 new residents.	Comment	The precise scheme has not yet been submitted to the Council and therefore the detailed design, layout and associated impacts cannot be fully assessed at this stage. Any effects on the Stour and Orwell Estuaries Special Protection Area (SPSA) or other designated sites will be considered in detail through the planning application process. An appropriate assessment, where required, will be undertaken at that time and any necessary mitigation measures will be identified and secured in consultation with Natural England.
1654	6687	Natural England (Jonathan Burt) [1654]	Suggest that the St Osyth car-park proposal require developer advice within a 2km (or updated 1.5km) coastal buffer, comply with the Essex Coast RAMS strategy, and provide at least 8ha of accessible semi-natural greenspace per 1000 new residents.	Comment	The Council notes the comments in relation to recreational impacts on designated coastal sites. Contributions toward mitigation of recreational disturbance arising from new development are addressed through Policy PPL4, which secures financial contributions in line with the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).
Businesses, Landowners, and Developers					
1713	13672	City & Country [1713]	Policy PP16 St Osyth Car Park, supports the delivery of a new public car park close to St Osyth village centre to improve access to local shops, services, and community facilities. This policy is strongly supported. SPL 1: Managing Growth, defines St Osyth as a Rural Service Centre. In addition, St Osyth Priory is an important tourist destination and hosts a number of weddings, events and hotel stays throughout the year. Provision for additional car parking provision within St Osyth will promote spending within the local area by tourists at St Osyth Priory, which will assist in boosting the local economy. The provision of additional car parking space for visitors to the shops and services in the village will support inward investment and is fully supported.	Support	Noted.
Community Representatives					
953	3507	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Comments noted. Policy PP16 relates specifically to the provision of a public car park and associated development. Matters relating to design quality, local character and heritage are addressed through other policies in the Local Plan, which require development to respond positively to its context. Proposals will be assessed on a case-by-case basis through the planning application process.
78	13592	St Osyth Parish Council (Mr Neil Williams,	Without the delivery of a new public car park, the cumulative impact of existing approvals and further planned development will significantly exacerbate these problems.	Support	Noted.

		Parish Clerk) [78]	St Osyth provides an important range of local facilities, including shops, a surgery and recreational amenities. The sustainability of these facilities depends upon accessible parking provision for: • residents (both existing and new); • elderly and mobility-impaired users; • visitors; and • local businesses and service providers. A public car park, as close as possible to the centre of the village, is not only desirable but essential to support the continued functioning and resilience of the village centre. The Parish Council acknowledges that the delivery of a new public car park will require a realistic and deliverable funding mechanism, and therefore supports the principle of a moderate and proportionate level of enabling residentia development, provided that: • the housing is directly linked to the delivery of the car park through a robust and legally binding agreement (such as Unilateral Undertaking under Section 106 (s106) of the Town & Country Planning Act 1990; • the scale and design of the development reflects the historic character and heritage setting of St Osyth; • the development is strictly limited to that necessary to enable delivery; • the public benefits demonstrably outweigh any landscape or policy harm, particularly where land outside, yet adjacent to the Settlement Development Boundary (SDB) is concerned; and • any development must result in the guaranteed delivery of the car park within an agreed and enforceable timeframe. The Parish Council considers that land at Warren Farm represents the most suitable and logical location for the proposed car park, given that the land is: • the closest potential site to the centre of the village; • provides appropriate access via existing footways;		

			• minimises intrusion and disruption to the centre of the village; • offers the opportunity for a well-designed and landscaped scheme; and • can accommodate both parking provision and associated development in a coherent and comprehensive manner. Given the scale of housing growth already consented or proposed within the Parish, it is reasonable and necessary that appropriate infrastructure, including a public car park, is secured as part of that growth. The Parish Council accepts that, if required, exceptional circumstances may justify development outside of the SDB and within the Coastal Protection Belt (CPB) where: • the development is proportionate; • harm is minimised through high-quality design and landscaping; • there is no suitable alternative site; and • the delivery of the car park provides clear, tangible and lasting public benefit. The scale of recent and proposed housing growth, combined with the acute and worsening parking pressures, constitutes a compelling justification for carefully controlled development to deliver the much needed public car park. In conclusion, St Osyth Parish Council strongly supports Policy PP16. The delivery of a new public car park is essential to: • improve highway safety and accessibility; • support the economic vitality of the village centre; • mitigate the impacts of approximately 820 additional dwellings; • protect residential amenity; and		

			• ensure that infrastructure provision keeps pace with development. Without such provision, the sustainability and functionality of St Osyth will be significantly undermined. The Parish Council therefore urge Tendring District Council to retain and progress Policy PP16, and to work proactively with the Parish Council and landowners, particularly in relation to land at Warren Farm, to secure the timely and guaranteed delivery of this critical and much needed infrastructure.		
Members of the Public					
1036	3666	Mr PETER BOYSON [1036]	I support the proposed new car park. The Priory car park can only take 14 vehicles, so I hope that the new car park will provide spaces for plenty of cars, including disabled spaces. I believe there are no designated disabled driver spaces anywhere in the village, we could do with some down the high street as it is dangerous for disabled people to cross the road at the crossroads by The Hoy. It should also be a free car park, as it would encourage more people to shop in the village and discourage people from parking on the double yellow lines.	Support	Noted.
1210	3874	Mr Roger Carey-Smith [1210]	The provision of a car park on St Osyth is vital as there is so little available and many people coming to the village and a large community involvement with events in the village. How can these events continue if there is know where to park	Support	Noted.
1187	3898	Mr Peter Bond [1187]	I fully support the much-needed car park for St Osyth along with the housing required to deliver this.Land at Warren Farm to the south of the vicarage is adjacent the church and borders the existing Settlement Development Boundary, it is an ideal site for this. This site is close to the local school and offers easy pedestrian access to the Village Neighbourhood Centre, it is also close to existing bus routes. The views of the Church and Priory from the south could be preserved by extensive landscaping and positioning single story housing in the foreground of these listed buildings.	Comment	Noted.
1317	3944	Simon Westripp [1317]	I object to the proposed site for the car park, which has previously been rejected on multiple occasions for the following reasons: Lack of suitable access (the entrance/exit is wide enough for only one vehicle), undue congestion (longer queues already build up to the crossroads even out of holiday season, and this problem would be further	Object	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising

			exacerbated by the additional proposal in this application to include housing on the same site), lack of lighting and safety concerns (the area is frequented by drug users and there is a risk of damage to vehicles). These reasons are now even more valid.		from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm. Detailed matters relating to highways, access and traffic impacts will be assessed at the planning application stage in consultation with the Highway Authority. Appropriate mitigation will be required where necessary to ensure that development does not give rise to unacceptable impacts on highway safety or network capacity.
1222	3950	Mr Richard Vigus [1222]	The proposed reapplication is based on the premise that a car park at Warren Farm is required both for visitors to Peter and Paul Church especially for weddings funerals and allow more parking for those wishing to shop in the high street. As far additional parking for visitors to the Church this would only be required on a few occasions a year for supplemental vehicle parking spaces. To cater for the increased number of vehicles on these occasions these could easily be accommodated in Cowley Park. It is around five minutes to ten minutes maximum walking time from the park on the pavement to the Church. Those attending the Church in vehicles would disembark at the Church entrance and the car drivers could drive to and park in Cowley park. I live adjacent to Cowley Park. The park is regularly used for football practice and matches at weekends, There is commonly around twenty cars parked on the grass, and some times more In spite of the wettest winter for many years there has been no problems with cars caused by excessive mud and difficulty exiting the site The entrance and exit to the park are easily and safely gained by gates on Mill Street. By allowing car parking in the park this would negate one of the reasons for the proposed car park on Warren Farm.	Object	Noted. Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm.
581	4129	Mrs Sally Webb [581]	It should be free to use to encourage people to buy locally	Support	Noted.
1356	4153	Mr John Kendall [1356]	With the closure of the Priory parking I think the proposal of a new car park is vital for the sustainability of the village and it's businesses and visitors.	Support	Noted.
1378	4219	Mr denzil hanson [1378]	We visit St Osyth regularly to go to the butchers and visit friends and family. We find it extremely difficult to park in the village to access local shops and have had to leave because of no parking. [redacted]. We would welcome a central car park to support local business and people visiting families and friends. We also welcome new houses especially bungalows as the village is a beautiful place to retire and luxury	Support	Noted.

			bungalows would be a great asset along with considerate housing to enhance the growing village.		
1258	13730	Jean Hutley [1258]	St Osyth Car Park St. Osyth needs more public car parking than is currently available to encourage use of local shops, and to facilitate easier visits to church and the doctor's surgery. Prosperous Places Chapter 6 - St Osyth Car Park The number of houses in St. Osyth has increased and is scheduled to increase further. There are a range of shops and community facilities, which necessitates a need for car parking. l accept that this public car park would be contingent on further housing off Warren Lane. This location is centrally placed to be useful for local shops, services and the Church. I support this long overdue need for St. Osyth to have it's own car park.	Support	Noted.
1267	13738	Lisa Westripp [1267]	The envisaged location of a car park in St. Osyth is inappropriate. (a) It is within the Coastal Protection Belt which adopts the precautionary principle to restrict development. (b) A car park and possible housing development in this location are not in keeping with the historic surroundings of the adjacent grade 1 listed buildings of St. Osyth Priory and Parish church. (c) Access to this site is difficult with restricted views along The Bury, in which there are 6 other entrance/exits in a stretch prox 100m long. The Bury has a high Volume of traffic in the summer particularly. (d) The site is hidden from the main highway and there are police incident reports of antisocial activity in this area which will no doubt increase. (e) It is understood the Priory Estate is proposing to create a car park or village and Priory use less than 200m from the Warren Farm site. (f) There have been no material changes since an almost identical proposal was rejected, on appeal, by the planning inspectorate. (g) Parking could be made available on Cowley Park recreation ground at far less Cost and harm to this historic area. Parking here is regularly made available when football tournaments and similar events take place. Also within 200m of village.	Object	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm. The policy allows for the possibility of a moderate level of enabling development where this is necessary to deliver the car park. Any such development must be proportionate and clearly justified. The Council will assess proposals to ensure that the scale of enabling development is appropriate and directly related to the delivery of the public benefit. Detailed matters relating to highways, access and traffic impacts will be assessed at the planning application stage in consultation with the Highway Authority. Appropriate mitigation will be required where necessary to ensure that development does not give rise to unacceptable impacts on highway safety or network capacity.
1488	13741	Peter Baker [1488]	Policy PP16 St Osyth Car Park. I would like you to accept this email as a formal objection to the above referenced proposal. The land should remain as it has been for hundreds of years. A car park is undesirable given the closeness to my property and I am sure	Object	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage, environmental impacts and effects on local amenity. The Council will

			would prove to an ant social meeting point come nightfall.		ensure that any harm arising from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm.
1492	13799	Barbara King [1492]	Objection to the proposed car park and housing at Warren Farm, St Osyth. A similar scheme was refused on appeal in 2018 and no material circumstances have changed. There is no demonstrated need: existing parking is available around the Bury, local roads, pubs and the social club, and previous informal parking nearby was under-used. The proposal would lie outside the village envelope, result in the loss of prime agricultural land, and harm a scenic, wildlife-rich area. A secluded car park risks noise, light pollution and antisocial behaviour, causing disturbance to nearby residents and being out of keeping with the church. Significant housing growth already exists nearby, making this development unnecessary.	Object	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm. The policy allows for the possibility of a moderate level of enabling development where this is necessary to deliver the car park. Any such development must be proportionate and clearly justified. The Council will assess proposals to ensure that the scale of enabling development is appropriate and directly related to the delivery of the public benefit.
1497	13827	Peter Reck [1497]	I object to the above planning for a car park and potential housing on the Warren farm Lane estate. This was already rejected in 2018. The village does not need any car parks and has several car parks one with over 50 spaces available for residence and local people visit visiting. Tourists who come to stay in caravans and chalets do not need the use of a car park in St Osyth Village as it's off the beaten track. At the crossroads people visiting go straight on and do not turn right. There is also plans for a 50 space car park at the Priory, which will benefit church users and locals.	Object	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm. The policy allows for the possibility of a moderate level of enabling development where this is necessary to deliver the car park. Any such development must be proportionate and clearly justified. The Council will assess proposals to ensure that the scale of enabling development is appropriate and directly related to the delivery of the public benefit.
1494	13857	Nicole Stafford [1494]	The proposed development of a small car park on farmland should be refused, as it would harm the rural character and natural beauty of the village. There is no clear need for additional parking, with existing provision already available nearby within reasonable walking distance. The proposal would result in unnecessary loss of agricultural land and visual amenity without sufficient justification or community benefit. It also risks setting a precedent for further erosion of the countryside.	Comment	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm.
1549	13904	Daren Firminger [1549]	Support for PP16 - Car Park in St Osyth I'm writing to show our total support for PP16: St Osyth Car Park. Since the Priory took back the Bury and reduced the parking available to the village, we are in desperate need for more car parking, particularly to help local businesses and events like the Church. In addition for the elderly population who need to be able	Support	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising

			to park their cars to get easier access to the shops in the village.		from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm.
1238	13936	Peter Tidy [1238]	The village needs a car park to enable residents and visitors unhindered unfettered access to shops and institutions. A car park is vital and necessary to enable persons to: - visit shops 'support' and 'benefit from' - visit and attend church, worship, baptism, wedding, funeral, special services, remembrance, etc. - visit local amenities, pubs, restaurant, clubs - visit and support sports events on Cowley Park - enable the village culture to be experienced and enjoyed	Support	Noted.
1268	13942	Heather Morton [1268]	Although we live in Clacton, we spend most of our time in St Osyth supporting local shops, Church & village hall. Parking is often difficult to find as allotted parking is usually full.	Support	Noted.
1544	13954	Kate David [1544]	This has been refused before as unsuitable and still is! The access is not suitable for 2 way traffic- shop traffic will never walk that far for it. The Priory are building an extra 50 parking spaces. There is parking in Colchester road too. It is a popular walking area and needs to be kept rural for the health enjoyment of locals.	Object	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm. The policy allows for the possibility of a moderate level of enabling development where this is necessary to deliver the car park. Any such development must be proportionate and clearly justified. The Council will assess proposals to ensure that the scale of enabling development is appropriate and directly related to the delivery of the public benefit.
1473	14027	Mrs Joan Bone [1473]	We need a sensibly located can park within the confines of the shopping/ business area. Warrens Farm field would seem a suitable site giving easy access to the church/ shops & doctor.	Comment	Noted.
1542	14076	Nicky O'Dell [1542]	I strongly support Policy PP16 to deliver a new public car park as much needed infrastructure to an expanding village.	Support	Noted.
1657	14133	Phillip Donegan [1657]	1 The loss of 'Coastal Protection Belt' land to development will cause an irreversible reduction in the quality of life for residents 2 The car park used as justification for the scheme will not end up being used for the purposes envisaged 3 The housing proposed would put further traffic pressure on the crossroads when this is already a dangerous junction	Object	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm.

					Detailed matters relating to highways, access and traffic impacts will be assessed at the planning application stage in consultation with the Highway Authority. Appropriate mitigation will be required where necessary to ensure that development does not give rise to unacceptable impacts on highway safety or network capacity.
1482	14144	Carol Jacobs [1482]	I accept that at certain times there is a need for some extra parking in the village but I object to the Warren Farm location. It should be excluded as a potential location due to the proximity to both the Priory and Parish church.	Comment	Policy PP16 sets out criteria under which proposals for a new public car park may be considered, including in locations outside defined settlement boundaries or within the Coastal Protection Belt. No specific site is allocated and the precise scheme has not yet been submitted. Any proposal will be assessed on its individual merits through the planning application process, having regard to landscape, heritage and environmental impacts. The Council will ensure that any harm arising from the location is fully considered and that development is only permitted where it can be demonstrated that the public benefits outweigh any potential harm.
1178	14203	Mrs Jill Bligh [1178]	We are desperate for car parking in St Osyth, without this, the shops are not getting our support. Events at the Church create massive amounts of traffic because of lack of parking, and the opportunity for parking is very limited.	Support	Noted.
1736	14206	Mr James Bligh [1736]	Car parking, close to St Osyth village centre, is in desperate need -- the only location that fits the bill is warren farm and with many more new houses being built in the area it is even more imperative that car parking is provided to help our village and encourage residents to support our shops.	Comment	Noted.

Policy PP16: St Osyth Car Park

Summary of Representations

The representations on Policy PP16 include both support for the principle of a new public car park at St Osyth and objections or concerns about the potential impacts of any associated development, particularly in relation to individual sites. Support is expressed on the basis that additional parking would improve access to local shops, services, community facilities and St Osyth Priory, helping to support the village centre, tourism and the local economy. Natural England raises concerns that the proposal, particularly if linked to residential development, could have recreational impacts on nearby designated coastal habitats, including the Colne Estuary SPA, and advises that development should address the relevant coastal buffer, Essex Coast RAMS requirements and the provision of accessible semi-natural greenspace. Other comments raise concerns about amenity, design, heritage and local character matters, including the need for development to respond sensitively to its setting.

In response, the Council notes the support for improved parking provision but confirms that the precise scheme has not yet been submitted and that detailed impacts will need to be assessed through the planning application process. Any effects on designated sites will be considered through Habitats Regulations assessment where required, with mitigation secured in consultation with Natural England. Recreational disturbance mitigation will be addressed through Policy PPL4 and the Essex Coast RAMS, while design, heritage, access and parking matters will be assessed against relevant Local Plan policies at application stage. No changes have been made to Policy PP16 or its supporting text.

CHAPTER 7: PROTECTED PLACES

Policy PPL1: Development and Flood Risk

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
349	4304	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Flooding significantly affects residents physical and mental health in both the short and long term. Trying to acquire insurance (is just one example) for dwellings at higher risk of flooding can be difficult and this impacts on the financial and mental wellbeing of the impacted residents. Health and emergency services buildings should not be built in Flood Zone areas 2 and 3 (where at all possible). Community hubs and centres should not be built in Flood Zone areas 2 and 3 (where at all possible) as they are often used as places of refuge during extreme weather events. Permeable paving should be used for driveways, parking areas and be accessible for wheelchair and mobility-aid users. ‘	Comment	These comments are noted, however many points raised are issues that will be addressed during planning application stage.
262	5219	Great Bromley Parish Council (Lizzie Ridout, Clerk) [262]	There should be a detailed assessment and early implementation of flood and surface-water mitigation measures to protect health and the environment.	Comment	The Council’s Strategic Flood Risk Assessment does this at a strategic level, and individual applications will be accompanied by site specific assessments at application stage.
90	13440	Tendring Parish Council (Mrs Marie Snell, Clerk/RFO) [90]	The Parish Council reiterates concerns regarding surface water flooding and inadequate drainage networks.	Comment	These comments are noted and Officers intend to direct new development to areas of lower flood risk.
1653	13445	Suffolk County Council (Georgia Teague) [1653]	Flood and Water Management Suffolk County Council as the LLFA for Suffolk provides no objection to the proposals of this draft Local Plan, and notes that the border between the two counties is predominantly a river, and thus covered by the Environment Agency.	Comment	Noted.
6	13460	Anglian Water Services Limited (Ms Tessa	Anglian Water supports the requirement for development proposals to be accompanied by a Flood Risk Assessment in the circumstances listed in the policy. However, we request that all new development proposals should	Comment	Whilst these points are noted, it is considered that the Plan should be read as a whole meaning that no further change is required.

		Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	include new green and blue infrastructure to help mitigate potential flood risk, which can include the provision of SuDS (see our response to Policy LP4). Furthermore, this is inconsistent with Strategic Policy PPL4 Biodiversity and Geodiversity, which requires all new development to include new green and blue infrastructure, and New Strategic Policy PPL5 Water Conservation, Drainage and Sewerage, which states "New development should include Sustainable Drainage Systems (SuDS)".		
823	13541	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Sustainable drainage should be included at the earliest opportunity in the planning process and early engagement with Essex County Council, as the Lead Local Flood Authority is crucial for flood risk management and to future proof developments from the impacts of climate change. Sustainable drainage should be considered alongside plans for biodiversity and local amenity to ensure they are multi-functional areas that are included in the landscape strategy. Where developments are on brownfield sites that discharge surface water to the foul network, alternative discharge locations should be sought. Discharge to the foul network will not be supported by the LLFA as these systems are overwhelmed. Comment and recommended change ECC welcomes the inclusion of Green and Blue Infrastructure (GBI) within the flood-risk policy. To strengthen its effectiveness, we recommend requiring major development proposals to clearly demonstrate how opportunities for integrating nature-based solutions, such as SuDS, naturalised drainage features, and green corridors, have been considered in line with Policy PPL4. Emphasising multifunctional GBI will help ensure developments contribute meaningfully to flood-risk mitigation and wider climate-resilience outcomes. Using the term ‘should’ suggests that developers are not required to consider GBI but may choose to do so and may be deprioritised over something that is a ‘must’. The slight revised wording strengthens the policy expectation around GBI and still leaves flexibility to avoid fixing developers into delivering GBI when not viable. (see full text for wording changes)	Comment	The proposed wording around major sites is logical and will be taken forward.
148	14475	Environment Agency (Environment Agency) [148]	The policy would better reflect the flood risk hierarchy if the Sequential and Exception Tests and search area guidance were placed at the start, prioritising “avoid” before mitigation, in line with NPPF and PPG. It should clarify that development is directed to lowest-risk areas and apply the Exception Test where necessary. The policy currently lacks reference to surface water management and SuDS, which may be better integrated following discussion with the Lead Local Flood Authority. Contributions to maintaining flood defences are recommended, along with	Comment	Officers broadly agree with the comments made here and they will therefore be taken forward. SuDS is covered elsewhere within the Plan. Whilst the points around flood mitigation are noted, it is considered that the Local Plan cannot mitigate for existing flood defences.

			consideration of bespoke policies for extensions, annexes and replacement dwellings in flood risk areas.		
Businesses, Landowners and Developers					
431	4455	Welbeck Strategic Land [431]	An objection is made because Strategic Policy PPL1 requires amendment to reflect the National Planning Policy Guidance's approach towards surface water flooding and a site-specific flood risk assessment as set out in the Setpember 2025 update. There is no longer a requirement to automatically require the sequential and exceptions tests to be undertaken for all sites subject of surface water flooding which is how Strategic Policy PPL1 is still drafted.	Object	The Local Plan should be read alongside National Planning Guidance and should not duplicate it, therefore no changes required.
1439	13885	Catesby Estates [1439]	Catesby broadly support Draft Strategic Policy PPL1, which seeks to ensure that development responds appropriately to flood risk, maximises resilience, and integrates green and blue infrastructure. The Site is partly located within Flood Zones 2 and 3, however, the concept plan set out in the Vision Document avoids these higher-risk areas, ensuring that development is directed to land at the lowest practical risk of flooding. Furthermore, the concept plan proposes significant provision of green and blue infrastructure across the Site, contributing to flood mitigation, enhanced biodiversity, and sustainable drainage, thereby directly supporting the objectives of this policy. This demonstrates that the Site can deliver development in a manner consistent with the Draft Policy and the NPPF, while providing safe, sustainable, and well-designed development. Additionally, the Site forms part of the proposed allocation SAMU5. This confirms that, in principle, development within the Site, including areas partially within Flood Zones 2 and 3, can be appropriately mitigated. If the Site is allocated, the requirements to undertake a sequential test should fall away.	Comment	Noted and the support given here is welcomed.
1471	14140	Stanfords (Beth Deacon-Bates, Head of Planning) [1471]	We consider the Abbey Brook development capable of aligning with PPL1. The main flood constraints relate only to the frontage and access, not the whole site, and can be addressed through a robust Flood Risk Assessment and SuDS strategy. The wider area remains suitable, available and achievable, as confirmed by the Council's evidence and planning history. Flood risk should therefore be treated as a technical design matter, not a reason to question the allocation. We believe PPL1 should be simplified to focus on local requirements rather than repeating national policy.	Comment	Officers have been informed by the family of the current freehold owner of the eastern section of the site (approximately 40%) that they acquired the land in December 2025. They have advised that they only became aware of the proposed allocation through the Regulation 18 consultation and do not intend to proceed with any residential development on their land. Evidence of ownership and site extent has been provided to officers. This represents a significant change in circumstances, resulting in the site now being in multiple ownership. The proposed access arrangements are similarly affected, with ownership effectively split and a physical boundary wall erected along the division, as illustrated in Map 1 below. The implications of this new information were put to the site promoters for comment; however, at the time of writing, no response has been received. As a consequence, the land within the control of the site promoters is substantially reduced, with

					corresponding implications for the capacity and layout of the scheme. More critically, the change introduces a high degree of uncertainty regarding the deliverability of the site, particularly in respect of achieving a comprehensive form of development and securing a suitable and viable access arrangement. In the context of the Local Plan process, and the need to demonstrate that allocated sites are available, suitable and deliverable, this new information raises significant concerns regarding the soundness of retaining the site as a proposed allocation. At the Committee meeting on 8th June 2026 it was resolved to remove this site as a proposed allocation for the Local Plan.
Community Representatives					
953	3508	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1712	14233	Bernard Jenkin [1712]	The Local Plan (chapter 7 of the Preferred Options) does identify flood risk as a key environmental constraint and includes policies that require development to be directed to areas of lowest risk through the sequential approach. However, specific site settlements in Ramsey, Harwich and Great Oakley are areas where coastal and tidal flood risks are significant. There has been flooding in Ramsey earlier this year. If planning is to be granted to sites within the floodplain, the council must justify and demonstrate how the sequential test has been applied at allocation stage, ensuring that the chosen locations for development are the most appropriate in terms of flood management.	Comment	The Council takes a sequential approach to allocating land for development. Any land allocated will also have to be accompanied by a flood risk assessment at application stage.
1175	14452	ONTRACK Tendring Transport Users (John Smock) [1175]	ONTRACK submissions argue that sustainable development requires housing within 1.5km of a railway station or 1km of a frequent (half-hourly) bus service, with good walking and cycling links, noting much recent housing is unsustainable due to poor public transport. They stress that transport infrastructure and service improvements should precede development, with enhanced bus services, improved stations, and new stations (e.g. Clacton North/Ardleigh). They emphasise protecting existing and disused rail corridors for future capacity, while highlighting concerns over congestion, freight impacts, and flood/high water table constraints affecting development viability. (SEE ATTACHMENTS FOR FURTHER INFORMATION REGARDING FLOOD RISKS AND HIGHWATER TABLE)	Comment	These comments are noted, however the plan already gives guidance on detailed design matters aswell as flood mitigation in this policy and in any event future applications will need to be accompanied by individual Flood Risk Assessments.
Members of the Public					

981	3605	Ms Danielle Williams [981]	Development must reduce flood risk and integrate sustainable drainage. There is no clear evidence that foul or surface water infrastructure in Wrabness has sufficient capacity for additional growth. Rural lanes and surrounding land can be susceptible to surface water accumulation during heavy rainfall. The Plan does not demonstrate how drainage will be managed without increasing runoff or placing pressure on existing systems. In the absence of confirmed sewerage capacity and a site-specific drainage strategy, the allocation appears premature.	Object	The Council takes a sequential approach to allocating land for development. Any land allocated will also have to be accompanied by a flood risk assessment at application stage.
1352	4064	Mrs Paula Bland [1352]	There is already a known risk of flooding in the Frating area. It's imperative that this is resolved before any thought of starting building a garden village at Hare Green.	Comment	The Council takes a sequential approach to allocating land for development. Any land allocated will also have to be accompanied by a flood risk assessment at application stage.
581	4130	Mrs Sally Webb [581]	the flood plains should be left as they are. No building at all.	Support	The Council takes a sequential approach to allocating land for development. Any land allocated will also have to be accompanied by a flood risk assessment at application stage.

Policy PPL1: Development and Flood Risk

Summary of Representations

Representations submitted for Policy PPL1 included a mix of comments, objections, and support. Many comments suggested there should be restricted or no development in flood zones. Other comments highlighted the need for detailed flood risk assessments, as well as proper drainage networks. Sustainable Drainage Systems and Green Blue Infrastructure were mentioned as strategies to mitigate flood risk. The Environment Agency and Essex County Council gave suggestions to the policy wording. On the other hand, developers asked that the policy be simplified

In response, changes have been made to Policy PPL1 and its supporting text. The supporting text has been updated to reflect the newest version of the Local Plan objectives. The policy wording has also been updated to require development proposals to consider the potential for new Green and Blue Infrastructure and other nature-based solutions to flooding. Further to this, the text regarding the ‘Sequential Test’ was moved within the policy to reflect the Environment Agency’s comments.

Policy PPL2: Coastal Protection Belt

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
6	13461	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water has critical infrastructure within the coastal protection belt which includes some of our water recycling centres. Therefore, we welcome the policy exception for development that has a compelling functional or operational requirement to be located within this designation. It should be noted that water recycling centres are utilitarian, functional assets that have infrastructure designed for a specific purpose, to treat wastewater to the required standard set by the discharge permit. There are limitations to how it's design can reflect the surroundings beyond landscaping.	Support	This is noted and the support welcomed.
1654	13491	Natural England (Jonathan Burt) [1654]	Natural England welcomes this policy and provisions to protect the open character of the undeveloped coastline. We support the Council's proposed 'adaptive approach' to coastal protection, where required, having regard to an assessment of the impact of coastal change and consideration of any applicable Shoreline Management Plan and Marine Plan.	Support	Noted.
823	13540	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	**Comments on Section 7** Protected places Building on the existing LTP3 and set out in the proposed Essex LTP4 ("A Better-Connected Essex") places environmental protection and reducing emissions at the core of transport planning. Section 7 can better reflect this by stating that: • transport emissions reduction, • reduced car dependency, • mode shift to active and sustainable travel, and • zero-emission freight and servicing are essential to the delivery and protection of Tendring's sensitive natural, coastal and heritage assets. Strategic Environment–Transport Policy Insert Recommend adding the following to Section 7 to help link the importance of sustainable transport policy with 'protecting places':	Comment	Whilst these points are understood, it is considered that the Connected Places section of this Local Plan covers this.

			"The safeguarding and enhancement of Tendring's natural, coastal, and historic environment depends on a transport system that reduces emissions, minimises traffic impacts and supports mode shift. Development will be required to demonstrate how its access, mobility and freight arrangements contribute to the protection of habitats, landscape character, air quality, and climate resilience, in line with building on the existing LTP3 and the proposed Essex LTP4 and the Tendring Transport Evidence." This sets a clear cross-cutting environmental test for all development.		
850	13614	Marine Management Organisation (Marie Canny) [850]	Please see below suggested policies from the South East Inshore Marine Plan that we feel are most relevant to your local plan. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plan is completed: • SE-INF-1: Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. • SE-INF-2: (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported. (2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities. (3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport. (4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) should demonstrate that they will in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts on existing landing facilities • SE-PS-1: Only proposals demonstrating compatibility with current activity and future opportunity for	Comment	Whilst the Local Plan can not replicate other Policies within it, mention is already made to the Marine Plan within the Local Plan. In any event the MMO will be consulted where necessary at application stage, where the highlighted policies will be considered.

			sustainable expansion of port and harbour activities will be supported. Proposals that may have a significant adverse impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts d) if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding. • SE-PS-4: Proposals promoting or facilitating sustainable coastal and/or short sea shipping as an alternative to road, rail or air transport will be supported where appropriate. • SE-REN-1: Proposals that enable the provision of renewable energy technologies and associated supply chains, will be supported. • SE-HER-1: Proposals that demonstrate they will conserve and enhance elements contributing to the significance of heritage assets will be supported. Proposals unable to conserve and enhance elements contributing to the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate harm to those elements contributing to the significance of heritage assets d) if it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets. • SE-SCP-1: Proposals that may have a significant adverse impact upon the seascapes and landscapes of an area should only be supported if they demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate d) if it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascapes and landscapes of an area. Where possible, proposals should demonstrate that they have considered how highly the seascapes and		

			landscapes of an area is valued, its quality, and the areas potential for change. In addition, the scale and design of the proposal should be compatible with its surroundings, and not have a significant adverse impact on the seascapes and landscapes of an area. • SE-FISH-1: Proposals supporting a sustainable fishing industry, including the industry's diversification, should be supported. • SE-EMP-1: Proposals that result in a net increase to marine related employment will be supported, particularly where they meet one or more of the following: i) create employment in areas identified as the most deprived, or ii) support and are aligned with local skills strategies and the skills available in and adjacent to the south east inshore marine plan area, or iii) create a diversity of opportunities, or iv) implement new technologies. • SE-CC-1: Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts, or, as a last resort, d) compensate and deliver environmental net gains in line with and where required in current legislation. • SE-CC-2: Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change. • SE-CC-3: Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference: a) avoid		

			b) minimise c) mitigate the significant adverse impacts upon these climate change adaptation measures. • SE-AIR-1: Proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increased greenhouse gas emissions, they must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements. • SE-ML-1: Public authorities must make adequate provision for the prevention, reuse, recycling and disposal of waste to reduce and prevent marine litter. Public authorities should aspire to undertake measures to remove marine litter within their jurisdiction. • SE-WQ-1: Proposals that enhance and restore water quality will be supported. Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate deterioration of water quality in the marine environment. • SE-ACC-1: Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, and also demonstrate the future provision of services for tourism and recreation activities, will be supported. Where appropriate and inclusive enhanced public access cannot be provided, proposals should demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts on public access. • SE-TR-1: Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Where		

			proposals may have a significant adverse impact on tourism and recreation activities they must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate that impact. • SE-SOC-1: Those bringing forward proposals are encouraged to consider and enhance public knowledge, understanding, appreciation and enjoyment of the marine environment as part of (the design of) the proposal. • SE-MPA-1: Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported. Proposals that may have adverse impacts on the objectives of marine protected areas must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate adverse impacts, with due regard given to statutory advice on an ecologically coherent network. • SE-BIO-1: Proposals that enhance the distribution of priority habitats and priority species will be supported. Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate d) compensate for significant adverse impacts. • SE-BIO-2: Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts		

			d) compensate for significant adverse impacts. • SE-BIO-3: Proposals that deliver environmental net gain for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services will be supported. Proposals must take account of the space required for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will in order of preference: a) avoid b) minimise c) mitigate d) compensate for net habitat loss and deliver environmental net gain. • SE-DIST-1: Proposals that may have significant adverse impacts on highly mobile species through disturbance or displacement must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts.		
148	14476	Environment Agency (Environment Agency) [148]	We welcome this policy and as per comments on PPL1, suggest that any development within the Coastal Protection Belt that benefits from existing flood risk management assets should be required to make contributions into an infrastructure fund to support future maintenance and improvement of those assets.	Comment	Whilst the points around flood mitigation are noted, it is considered that the Local Plan cannot mitigate for existing flood defences.
826	14507	Essex Wildlife Trust (Annie Gordon) [826]	Tendring's coastline is subject to the combined pressures of sea level rise, increased storminess, and coastal squeeze — the process by which intertidal and coastal habitats are unable to migrate landward because of hard coastal defences or development. Several of the most important habitats in Tendring — saltmarsh, intertidal mudflats, and coastal grazing marsh — are in areas that will be progressively affected by coastal squeeze over the plan period. We are concerned that the plan does not include a positive policy on coastal realignment or managed retreat, which would allow habitats to migrate landward in response to sea level rise. The plan should resist any new development that would foreclose future coastal realignment options, and should include a policy supporting coastal habitat creation as a response to coastal squeeze where this is compatible with other land uses and ecological objectives.	Comment	Whilst these issues are understood, it is considered that these issues are covered within the Shoreline Management Plan rather than the Local plan.
Businesses, Landowners and Developers					

1439	13886	Catesby Estates [1439]	Catesby are generally supportive of Draft Strategic Policy PPL2, which seeks to protect the open character of the undeveloped coastline through the Coastal Protection Belt. In this context, it is important that the boundary of the Coastal Protection Belt accurately reflects the extent of the draft allocation to ensure that development coming forward within SAMU5 is not arbitrarily constrained. The Draft Proposals Map appears to achieve this, and Catesby therefore support the proposed alteration to the Coastal Protection Belt as it provides a clear and appropriate boundary while maintaining the objectives of the policy.	Comment	Comment noted.
Community Representatives					
953	3509	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
1148	3872	Mr David Green [1148]	Protecting the coast is of paramount importance especially the Brightlingsea salt marshes which are home to many resident birds, several migrant birds and several species on the red list. We are already at risk of making curlews extinct because of loss of habitat so this must be a priority.	Support	Whilst this is noted, biodiversity issues are covered in a specific policy in this Local Plan.
1337	3986	Captain Andrew Rudge [1337]	I applaud the objectives of this policy. However the development of SAH3 land off Ransome Way would decrease the Coastal Protection belt. Given the future risk to flooding and coastal erosion of this land it is important this land is kept free from development to allow space for shore line management and tidal flood zone. In addition development of SAH3 would decrease quality of life for residents and visitors, in terms of visual amenity and access to the natural environment.	Support	Site SAH3 will not be taken forward into the Regulation 19 Local Plan. This decision is primarily based on ecological considerations, with Essex Wildlife Trust identifying the site as highly sensitive due to its proximity to Hamford Water and its role as functionally linked land. In reaching this position, the Council also recognises the broader relationship between such undeveloped coastal land and the Coastal Protection Belt, including its importance for shoreline management, flood risk resilience, visual amenity, and access to the natural environment. These factors collectively reinforce the case for retaining the site in an undeveloped state at this time.
581	4131	Mrs Sally Webb [581]	Sensible	Support	Noted.

Policy PPL2: Coastal Protection Belt

Summary of Representations

A number of statutory consultees gave support to the policy and made wording suggestions. The MMO made specific recommendations to include their own policies within the plan, however it was considered that the Local Plan should not replicate other planning guidance. The EA suggested that mitigation could be sought for existing flood defences, however it is considered that as these features already exist, we would therefore not seek mitigation retrospectively. Members of the public supported the policy and raised issues around biodiversity, but this is considered elsewhere in the Plan. Members of the public also commented on a specific site allocation, but this has now been removed.

In response to the representations received, changes to have been made to the wording of supporting text for Policy PPL2. However, no changes are required to the policy wording.

Policy PPL3: The Rural Landscape

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
926	3914	National Landscape Office (Beverley McClean, National Landscape Planning Officer) [926]	Correction needed to the name of Suffolk & Essex Coast & Heaths National Landscape and singular statutory purpose for accuracy. Insufficient information included in the policy to effectively guide development in the 2 National Landscapes in Tendring District. Request for standalone National Landscape policy in the Local Plan - examples included from Colchester, Babergh & Suffolk Coastal Local Plans Policy LLP3 should highlight the need for LVIA or Landscape Appraisal similar to LLP4 and ecological assessments	Comment	Officers have considered the emerging policy from Colchester City Council, which shares many similarities with this draft policy. The council has taken some elements to improve PPL3 and these include; undergrounding of cables within National Landscapes and inclusion of requirement for LVIA and as a result of this supporting text had been changed to provide greater clarity. It is therefore considered that an entire new policy is not required.
276	3971	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	The rural landscape should be protected as much as possible. Stronger powers to protect rural assets such as those listed, should be supported by robust policies. Development around heritage assets, registered parks and gardens and sites of high value and sensitivity should generally be refused in order to protect their character and appearance. Where development around such sites is approved, generous buffer zones should be implemented around the boundaries of Registered Parks & Gardens, and other heritage assets within the district to prevent any proposed development near such sites from harming their setting, character and/or appearance.	Support	These landscape designations and heritage assets already have a high level of protection within the plan. A blanket restriction on development in the countryside would significantly restrict where new development could be located and would run contrary to the NPPF.
1110	3989	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We feel very strongly that the Lawford Tye Field must be afforded protection against any development that would cause material harm to its character and appearance. We will attach the appeal decision by Helen Heward, the Inspector who dismissed APP/P1560/W/18/3201067, and agreed with Natural England that the proposal in question would have a significant effect on the SPA and Ramsar site of the Stour and Orwell Estuaries. The relevant section has been highlighted in yellow, and we would therefore ask that Lawford Tye field is included as a Protected Site.	Comment	The comments here are noted and it is considered that further protection of this site could be allowed by the Council by the designation of Safeguarded Open Space. It is recognised that the space is used informally as public open space and the land adjacent is also protected by this same designation.
1110	4057	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish	Lawford Parish Council requests that protection must be given to Lawford Tye Field, off Grange Road, Lawford CO11 2JB. It strongly supports Strategic Policy PPL3 where the District Council will protect the rural landscape and refuse planning permission for any proposed development which would cause material harm to its character or appearance. One of the reasons that on 23rd October 2019 Planning Inspector Helen Heward dismissed APP/P1560/W/18/3201067 was the	Support	The comments here are noted and it is considered that further protection of this site could be allowed by the Council by the designation of Safeguarded Open Space. It is recognised that the space is used informally as public open space and the land adjacent is also protected by this same designation.

		Councillor) [1110]	impact that the development would have had on the character and appearance of the site and locality with particular regard to the setting of the settlement, distinctive features, and landscape character.		
90	13441	Tendring Parish Council (Mrs Marie Snell, Clerk/RFO) [90]	The Parish Council reiterates its concerns regarding harm to rural character and settlement identity.	Comment	Whilst these comments are noted, it is considered that landscape character has already been considered when looking at allocation sites and seen to be acceptable in this instance.
1654	13492	Natural England (Jonathan Burt) [1654]	Strategic Policy PPL3 The Rural Landscape Natural England welcomes the protective provisions for Dedham Vale, and Suffolk Coast and Heaths National Landscapes and their settings, and for estuaries, rivers and the undeveloped coast. Natural England advises adding wording set out in full submission.	Comment	Comments noted and will be carried forward.
823	13542	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Comment and recommended change It is recommended that the Rural Landscape policy reference the Essex Local Nature Recovery Strategy (LNRS), as this relates when assessing rural landscape sensitivity, enhancement opportunities, and long-term stewardship. -term stewardship. Suggested policy addition. “In considering impacts on the rural landscape, development proposals must have regard to the Essex Local Nature Recovery Strategy (LNRS) and should support its identified priorities for nature recovery wherever appropriate.”	Comment	This comment appears to be acceptable and will be carried forward.
Businesses, Landowners and Developers					
1422	4460	M Scott Properties Ltd (Scott Properties) [1422]	The current policy wording is overly restrictive and does not reflect the balanced approach in the National Planning Policy Framework 2024 which requires the consideration of the rural landscape alongside social and economic benefits. Therefore it is considered the wording is currently not justified or effective as set out in paragraph 36 of the NPPF 2024 with amended policy wording proposed in the full comments section.	Comment	The Local Plan should be read as a whole, allowing a balance of issues to be made.
1439	13887	Catesby Estates [1439]	Catesby broadly support Draft Strategic Policy PPL3, which seeks to protect the character and appearance of the rural landscape and ensure that development positively responds to its context. The Site will be designed using a landscape-led approach, ensuring that all landscape features of value are retained and enhanced wherever possible. The concept plan demonstrates opportunities for the creation of new multi-functional open spaces and landscape planting, which will complement the local community and wider landscape setting. This approach will	Support	These comments are noted.

			ensure that development responds positively to skylines, prominent views, heritage assets, and the wider natural environment, consistent with the objectives of the draft policy.		
1495	14183	Martine Ward [1495]	Tendring's rural character has always been one of its defining strengths, offering residents a sense of space, tranquillity, and separation from the pressures of urban life. That character is now being steadily eroded. Continuous development, increased traffic, commercial intensification, and the early stages of major infrastructure projects have created an environment where quiet space is becoming increasingly rare. In villages such as Elmstead, the scale and pace of growth are now reaching a point where the settlement risks losing its rural identity altogether. If expansion continues at the current rate, the village will no longer function or feel like a village; it will take on urban characteristics — higher noise levels, heavier traffic, reduced green space, and a permanent loss of the calm and openness that once defined it. The cumulative effect of construction, mineral extraction, infrastructure works, and commercial activity is a gradual but significant loss of the rural qualities that residents value most: peace, open views, natural landscapes, and the ability to enjoy outdoor spaces without constant disturbance. Once these qualities are lost, they cannot be restored. The Neighbourhood Plan must recognise the importance of protecting tranquillity, rural distinctiveness, and the scale of existing settlements. Future development must not overwhelm villages to the point where they lose their identity and become urbanised in character.	Comment	Whilst these comments are understood, it is considered that Elmstead village already benefits from greater protection than other similar villages in the Local Plan. This is due to the recent adoption of their Neighbourhood Plan and their close proximity to the Garden Community. The village also benefits from a new Green Gap designation to its west.
1692	14350	Lewis & Scott Homes [1692]	We OBJECT to the reference in this policy to the intention to refuse planning permission for any development that causes a material harm to the rural landscape. This effectively protects the landscape for its own sake and prevents any development – including the large site allocations – from coming forward. This is clearly not the intention of the policy. The following amendment is suggested: (See attached document for proposed changes)	Object	The Local Plan should be read as a whole allowing for balance in decision making.
Community Representatives					
Members of the Public					
1337	3988	Captain Andrew Rudge [1337]	I support the councils policy PPL3 to protect rural landscapes & refuse permission for any development which would cause material harm to its character or appearance, including estuaries, rivers & undeveloped coast. This would support endeavours to preserve the Walton Backwaters in line with RSPB plans and the councils push for UNESCO recognition for this exceptional area.	Support	The support for this Policy is welcomed.

			Any development at to SAH3 (land off Ransome Way) and other proposed developments north of the B1034 Kirby / Walton road would be counter to this policy and should be opposed.		
1352	4065	Mrs Paula Bland [1352]	With the pylons and underground cables we already have more than our fair share of spoiling the rural landscape. Much of the electricity generated by these is not for local consumption. Hare Green development will only crucify what rural landscape is remaining.	Comment	This is not an issue that the Local Plan can address.
581	4132	Mrs Sally Webb [581]	Excellent	Support	Noted.

Policy PPL3: The Rural Landscape

Summary of Representations
Representations for Policy PPL3 included a mix of comments, objections, and support. The National Landscape Office requested a standalone National Landscape Policy, and Lawford Parish Council called for the Lawford Tye Field to be included in the Council's Safeguarded Open Space. Calls were made for the rural landscape to be protected, and for greater protection to be given to landscape and heritage.

In response, changes have been made to Policy PPL3 and its supporting text. The Policy wording was amended to include greater protections for National Landscapes and Natural England's National Character Area profiles for the Greater Thames Estuary and Norther Thames Basin. Reference was also added to the Essex Local Nature Recovery Strategy (LNRS). The supporting text was updated to emphasise the importance of the National landscapes and skies that could qualify for the International Dark-Sky Association (IDA) accreditation. Lawford Tye has also been included as a Safeguarded Open Space.

Policy PPL4: Biodiversity and Geodiversity

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
1110	3827	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We support the narrative in section 7. Protected Places, Biodiversity and Geodiversity, and the importance to protect the quality of the District's most special natural and built environments, particularly any site that lies within the Zone of Influence of the Stour and Orwell Estuaries SPA/Ramsar sites. These must be protected from any development that will likely have an adverse effect on their integrity. The Lawford Tye Field meets these characteristics.	Support	The comments here are noted and it is considered that further protection of this site could be allowed by the council by the designation of Safeguarded Open Space. It is recognised that the space is used informally as public open space and the land adjacent is also protected by this same designation.
1110	3994	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	Because of the evidence presented in APP/P1560/W/18/3201067, we ask that Lawford Tye Field is included as a protected site in this Local Plan. Three esteemed field specialists, Mr John Hall MBE, Chief Executive of EWT for 28 years; Mr Reginald Arthur Fry, Fellow of the Royal Entomological Society; and Dr Chris Gibson's a former ecologist from NE, provide key evidence to the inspector who dismissed that appeal. There has not been any material change of condition in this particular field, therefore its special characteristics referred to in that appeal decision must be protected.	Comment	The comments here are noted and it is considered that further protection of this site could be allowed by the council by the designation of Safeguarded Open Space. It is recognised that the space is used informally as public open space and the land adjacent is also protected by this same designation.
6	13462	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water supports the policy requirement for all new development to include green and blue infrastructure, consistent with New Strategic Policy PPL5. The multifunctional benefits of green and blue infrastructure should not be underestimated, in terms of opportunities for nature recovery, but also to help minimise flood risk through the provision of nature-based solutions and SuDS.	Support	These comments are noted.
1654	13493	Natural England (Jonathan Burt) [1654]	We welcome the protective provisions embedded within this policy for statutorily designated nature conservation sites including international, European and nationally important marine and terrestrial sites, in addition to locally designated sites and priority habitats and species. Whilst supporting text indicates that new development should have regard to a mitigation hierarchy approach, we advise that application of the mitigation hierarchy, to prioritise impact avoidance, should be a policy	Comment	Comments are noted and some requests for wording changes are being taken forward.

			requirement. Further wording is provided in full submission.		
823	13543	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Support This policy is strong in its protection of designated sites, it's requirement for ecological assessment, and its expectation that all development must deliver new or enhanced GBI while aligning with the Essex Local Nature Recovery Strategy (LNRS). It embeds both the mitigation hierarchy and biodiversity net gain principles, ensuring development contributes positively to ecological networks, habitat restoration, and species recovery. The explicit alignment with the LNRS and the Essex Green Infrastructure Strategy strengthens its spatial relevance and ensures nature recovery priorities are integrated into planning decisions. We welcome the addition of the requirements for developments to consider other ecological features not captured by the BNG metric, such as bird and bat boxes etc. The policy could be further strengthened by adding a reference to monitoring and long-term management expectations for created habitats long term management expectations for created habitats. (See full text for edits to para 7.21)	Support	The proposed changes to text sound acceptable and will be carried forward.
244	13646	Ardleigh Parish Council (Ardleigh Parish) [244]	Environmental and Landscape Protection Key concerns include: Impact on rural landscape character Harm to heritage and amenity Loss of biodiversity and ecological connectivity Risks to Ardleigh Reservoir water quality There is also concern that: Biodiversity Net Gain targets may not be effectively enforced Green infrastructure commitments are not sufficiently robust Request: Strong, enforceable environmental protections Mandatory green infrastructure and biodiversity enhancements	Comment	Officers consider that there are already strong protections in place for the issues raised. These include protections for heritage, landscape and the rural environment and protected species.
148	14477	Environment Agency (Environment Agency) [148]	PPL4 is a strong policy and demonstrates robust protection for our designated sites- clearly following the avoid, mitigate, and compensate hierarchy. We would suggest that further detail is added in the following areas to improve its effectiveness:	Comment	The support for this Policy by the Environment Agency is welcomed. The suggestion to include river banks and buffers is noted and will be carried forward to reflect PPL4a. In regard to the UK habitat classification, it is considered this information is too technical to be sighted within a Local Plan Policy. This being said, other regimes will need to be considered outside of the Local Plan, when determining applications.

			• PPL4 doesn't explicitly reference rivers or riparian biodiversity, this should be included as in PPL4a to ensure consistency with the LNRS • Where policy refers to ecological assessment this needs to specify the use of UKHab classification (the standard in BNG) • Specific requirements should be set regarding surveys – seasonality, minimum standards, adherence to CIEEM guidelines etc • It should not be assumed that long-term management will follow because of BNG obligations the policy should specify requirements for long-term ecological management plans and monitoring		Long term management plans and monitoring will also be mentioned.
826	14493	Essex Wildlife Trust (Annie Gordon) [826]	We acknowledge that Policy PPL4 covers the key requirements of NPPF Chapter 15 and the Habitats Regulations in broad terms. The policy affords protection to the designated site hierarchy, requires HRA for proposals likely to significantly impact European sites, commits to Essex Coast RAMS contributions, establishes a mitigation hierarchy approach, and requires ecological survey by a suitably qualified ecologist. The policy also contains positive requirements for all new development to demonstrate how LNRS opportunities have been maximised and how biodiversity enhancement will be delivered. However, the policy has a number of weaknesses that should be addressed before the plan is submitted for examination. First, the policy does not explicitly affirm that the Conservation of Habitats and Species Regulations 2017 take precedence over other planning considerations, and that the legal test is one of 'no adverse effect on site integrity' rather than a balancing exercise. NPPF paragraph 195 is clear that the presumption in favour of sustainable development does not apply where a plan or project is likely to have a significant effect on a Habitats site (either alone or in combination with other plans or projects) unless an appropriate assessment has concluded that it will not adversely affect the integrity of the site. The policy should make this legal position explicit. Second, the policy does not specifically address functionally linked land (FLL) — that is, land outside designated site boundaries that supports qualifying features of those sites (for example, arable land used as feeding habitat by SPA bird species such as Dark-bellied Brent Geese, Golden Plover, and Lapwing). The HRA	Comment	`Whilst these comments are noted it is considered that it would not be correct to mention legal issues within the Local Plan, which is a land use planning document. The Local Plan should be read in conjunction with NPPF and therefore it is unnecessary to duplicate national guidance within the Local Plan. The comments regarding FLL will be taken forward. Whilst the comments for the differentiation of habitat types are noted, it is felt that the level of detail could be confusing in the determining of applications. However, it is recognised within the policy that more sensitive sites will require an 'appropriate assessment' which covers this level of detail. The comments regarding requirements for small scale bio-diversity enhancement features is noted, however it is considered that applications will be determined on their own merits and this may not be appropriate for all types of development. Finally, the Local Plan should be read in conjunction with the LNRS, and therefore policy wording will not be duplicated with this guidance.

			Screening Report identifies this as a key pathway to LSE for numerous allocations. The policy should require ecological assessments to explicitly identify and assess FLL as part of any ecological appraisal for development near Habitats sites. Third, the policy does not include specific protection for the District's most important priority habitat types. Given Tendring's outstanding coastal ecology, it would be appropriate for the policy to name the key priority habitats present — including coastal and floodplain grazing marsh, intertidal mudflats, saltmarsh, saline lagoons, ancient and semi-natural woodland, and traditional orchards — and to require that any development affecting these habitats is subject to a higher level of assessment and justification in line with the mitigation hierarchy. The current generic wording risks these habitats being treated as equivalent to lower-value grassland or improved farmland in BNG calculations. Fourth, the requirement for small-scale biodiversity enhancement features — bird and bat boxes, swift bricks, hedgehog highways, and similar features — is currently framed as 'should consider,' which implies optionality. We would wish to see this strengthened to a clear expectation that all new residential and commercial development will incorporate such features, with the specifics to be determined through pre-application engagement where appropriate. This would align with the spirit of NPPF paragraph 192(d) which states that opportunities to improve biodiversity should be integrated as part of development design. Fifth, the policy's references to the Essex LNRS are positive but insufficiently spatial. The policy requires developers to demonstrate how LNRS opportunities have been 'maximised' but provides no framework for how this should be assessed or evidenced. Without a map of LNRS strategic opportunity areas and priority habitats integrated into the Local Plan, this requirement cannot be effectively applied. We recommend that a spatial GI and nature recovery framework — discussed further below — should underpin the policy.		
826	14496	Essex Wildlife Trust (Annie Gordon) [826]	Tendring District contains over 100 Local Wildlife Sites (LoWS). These sites — encompassing ancient and semi natural woodland, unimproved and semi-improved grassland, grazing marsh, coastal and estuarine fringe habitats, churchyard grasslands, hedgerow networks, and ponds — collectively form the backbone of the District's non statutory ecological network. They are the principal	Comment	The Council is currently preparing a review of LoWS and any finding will become a material consideration in the determination of planning applications. Whilst officers appreciate the setting of a LoWS is an important consideration it is not felt an arbitrary distance from wildlife sites would be an appropriate response within policy. It is likely that this will be considered as part of the LoWS review.

			wildlife refuges connecting the internationally designated estuarine habitats around Tendring's coast with the rural interior, and they provide essential habitat for many of the species for which the adjacent SPAs, SACs, and SSSIs are designated. LoWS are, by definition, non-statutory designations. They carry no protection in law and are entirely dependent on the strength of local planning policy for their safeguarding. In districts such as Tendring, where over a hundred such sites exist across a predominantly rural and coastal landscape facing substantial new development pressure, the quality of LoWS policy is therefore of critical importance. Weak or ambiguous policy creates a real and practical risk that individual LoWS are lost, fragmented, or degraded through incremental development decisions, none of which individually triggers the level of scrutiny applied to statutory designations, but which collectively can cause irreversible damage to the ecological network. We consider that the LoWS protection provisions in the Regulation 19 Local Plan, as currently drafted, are materially insufficient to fulfil this protective function. (See attached document for details of weaknesses)		The Plan needs to be read as a whole and in particular PPL3 which provides for HRA and Appropriate Assessment to ensure any impacts on wildlife and biodiversity is appropriately assessed.
826	14506	Essex Wildlife Trust (Annie Gordon) [826]	We note that the plan references ancient woodland and veteran trees as irreplaceable habitats within the PPL4 policy framework, and that these are listed in Appendix C. However, the plan does not include a specific policy on ancient woodland buffer zones, and the ISA site assessments do not consistently identify ancient woodland as a constraint for individual allocations. NPPF paragraph 193(c) requires that development resulting in the loss or deterioration of irreplaceable habitats is refused unless there are wholly exceptional reasons. Natural England guidance recommends a minimum 50-metre undeveloped buffer around all ancient woodland. We recommend that the plan includes an explicit policy statement implementing this buffer requirement, and that the ISA site assessments are revisited to ensure ancient woodland and its connectivity are consistently assessed.	Comment	Whilst comments are noted it is understood that Natural England will be consulted as part of an site application, meaning that a buffer on the proposals maps is not necessarily required.
Businesses, Landowners and Developers					
63	4017	Colchester Natural History Society (Mr Peter Hewitt, Planning Officer) [63]	The recognition of biodiversity net gain (BNG) while welcomed must recognise that species habitat cannot always be quickly replicated elsewhere. Sites that may require full habitat loss should be subject to independent, informed ecological survey that covers the annual cycle.	Comment	Whilst these issues are noted, it is considered that the Nationally Prescribed BNG standards cover this.

1638	4430	Lichfields (Amy Jones, Planner) [1638]	Our client is supportive of the aims of this policy but requests that further clarification is provided as to how proposals should 'demonstrate' compliance with the Policy, and strongly suggests that the requirements should not be too inflexible and onerous or above national requirements.	Comment	The support here is welcomed.
1439	13888	Catesby Estates [1439]	Catesby broadly support Draft Strategic Policy PPL4, which seeks to protect and enhance biodiversity and geodiversity, safeguard designated sites, and ensure that development incorporates green and blue infrastructure. The Site will be designed to retain and enhance existing ecological features and provide significant new green and blue infrastructure, including approximately 52.65ha of multi-functional open space and landscape, consistent with the objectives of this policy. This approach will help secure measurable biodiversity net gain and create high-quality amenity space for the community. However, in relation to the green infrastructure contributions, Catesby consider that any requirements must be clearly defined, proportionate, necessary, and directly related to the development. Broad or undifferentiated requirements for contributions that are not directly linked to the development would be inappropriate and could impact deliverability. The Council should therefore provide clear contribution tariffs for green infrastructure. In relation to the Essex Coast Bird Aware (formerly RAMS) contributions, these must only be secured where there is robust evidence of a likely significant effect on a designated site within the Zone of Influence ('ZoI'). Contributions should not be applied on a blanket basis across the ZoI, and any requirements must meet the same statutory tests for necessity, proportionality, and direct relationship to the development. Catesby consider that the policy should explicitly allow for the submission of a shadow Habitats Regulations Assessment (HRA) alongside planning applications to demonstrate whether there are likely significant effects on the ZoI, and to avoid unnecessary contributions where no such effects are anticipated. Additionally, the Council has undertaken a Habitats Regulations Assessment Screening Report (January 2026), and an Appropriate Assessment is to be undertaken and published with the Regulation 19 Local Plan. Catesby would welcome the opportunity to work with Place Services in relation to this, and will comment on the Appropriate Assessment once it becomes available.	Comment	Whilst these comments are noted, it is considered that the RAMS Strategy is clear, proportional and related to the host development. The strategy has had the input off all LPA's in Essex and Natural England. It is clear that any residential development within the ZoI will either need to pay the RAMS Tariff or make alternative arrangements which will also need to satisfy Natural England.

1530	14299	Berrys (Lauren May, Senior Planning Consultant) [1530]	We strongly object to the introduction of policy PPL4a which seeks to require all qualifying developments to provide a 20% BNG enhancement. No justification has been provided by the Local Planning Authority regarding why the nationally set 10% BNG enhancement is not sufficient in Tendring. The introduction of a 20% enhancement would negatively impact the developability and profitability of site's allocated for development, in particular housing sites on greenfield land.	Object	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
Community Representatives					
953	3510	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
728	4283	Swifts Local Network: Swifts & Planning Group (Mr Michael Priaulx, Chair) [728]	Reference to swift bricks in PPL4 is welcome, but please implement NPPG Natural Environment 2025 paragraph 017 (https://www.gov.uk/guidance/natural-environment), with regard to at least one swift brick per dwelling on average for new developments as these are a universal nest brick for small bird species... Please add, as house martins are a significant species in Tendring: "Artificial nest cups for house martins may be specified as an alternative to swift bricks, where recommended by a suitably qualified ecologist." Please also add: "Post-construction stage confirmation of installation is required... Existing nest sites in buildings should be protected and retained where possible.	Comment	The comments regarding requirements for swift bricks is noted, however it is considered that applications will be determined on their own merits and this may not be appropriate for all types of development.
1550	13976	PACE (John Hall) [1550]	PPL4 Biodiversity and Geodiversity and PPL4a Biodiversity Net Gain in Tendring. To the following section "All new development must be designed to include new green and blue infrastructure and protect and enhance existing green and blue Infrastructure inthe local area. Proposals will be expected to demonstrate: • how opportunities for preservation, restoration, enhancements and connection of natural habitat as set out in Essex Local Nature Recovery Strategy (LNRS) have		Whilst comments are noted, to be this specific is likely to be onerous and does not accord with the BNG guidance. Related changes as advised by Statutory Consultees has been made to Policy. Whilst points around access to public open space are noted this is considered at greater detail at HP5. However, it is considered that to reiterate national standards would not be appropriate for this policy.

			been maximised; and • how biodiversity enhancement and net gain measures will be incorporated, including the use of habitat restoration and natural regeneration." Tendring Council must add that “it is expected that where Biodiversity Net Gain provisions cannot be met on the development site, then off-site provision of Biodiversity Net Gain must be achieved adjacent to or as close as possible to the development site and the further the off-site provision were to be away from the development site this would constitute a material planning consideration”. The importance of Green (and Blue) infrastructure to residents must not be under emphasised – such spaces are crucial to the wellbeing of individuals and communities. Tendring council must be more specific in its plan about providing Accessible Natural Green (and Blue) Space – these are defined by Natural England: that everyone lives within 300m (or a 15-minute walk) of a natural space of at least 2 hectares, with larger sites (20–500 ha) located within 2–10 km of homes. Adopting these measures in the Local Plan will be a massive boost to local communities and the quality of life in Tendring Small additional point is that Habitats Directive should be written with capital ‘H’ and capital ‘D’		
Members of the Public					
1179	14549	Mrs Pamela Everson [1179]	Wildlife Concerns A survey of 42 developments nationally revealed that only 53% of promised wildlife enhancements were actually implemented, so who checks that these promises are actually kept? Hedgehogs: 83% promised 'hedgehog highways' missing Birds and bats: 75% bat and bird boxes not installed Invertebrates: missing bug boxes Woodland: threatened by large-scale developments 39% of trees detailed on planting plans were dead or missing. This is NOT a good record?!!! I hope the planning policy team take note of all these points.	Comment	Whilst these comments are noted, it is considered that the Local Plan as drafted has the right safeguards for protected species and their wildlife within its Policies.
1113	3793	Mr Keith Smithard [1113]	Object to the proposal to build on the land adjacent to Branscombe close. This is on the basis that there is a plethora of species living in the field. This includes species of bats, kestrels pheasants, field mice, deer and	Object	Any proposals for this site will need to be accompanied by a habitat regulations assessment which will identify which species are found onsite and propose mitigation for that.

			hedgehogs to name a few. Plus the abundance of insects, wildflowers. There is no other area like it in Frinton within the gates. Destroying it would mean the last open field space within the gates would be gone forever.		
1337	3991	Captain Andrew Rudge [1337]	I support the policy PPL4 to protect sites for their international, European and national importance to nature conservation. The importance of Walton Backwaters and the adjacent undeveloped countryside should be preserved for migratory birds and other wildlife in this area. Migratory / winter feeding birds frequently feed on the slightly higher grassland around Coles lane and the fields designated to SAH3, especially at high tide when the mudflats in the backwaters are covered. The proposed development SAH3 will prevent species from accessing their feeding sites. A significant loss to the area and contrary to this policy.	Support	The proposed allocation site referred to at Walton on the Naze has been removed as a result of a decision made at the Planning Policy and Local plan Committee on 8th June. The comments made are therefore not an issue at this stage.

Policy PPL4: Biodiversity and Geodiversity

Summary of Representations

Representations submitted for Policy PPL4 included objections, comments, and support. Lawford Parish Council requested Lawford Tye Field be included as Safeguarded Open Space. Natural England asked for the supporting text to indicate new development have regard to a mitigation hierarchy approach. Essex County Council suggested the policy could be strengthened by adding reference to the monitoring and long-term management expectations for created habitats. The Environment Agency suggested further details to the policy to improve its effectiveness. Other representations pointed out weaknesses in the policy, lack of LoWS protection, ancient woodland buffer zones, and inflexibility within the policy wording. Meanwhile, another representation argued PPL4 had too broad of requirements related to development proposals. Some reps objected to the BNG requirement, arguing a higher percentage is not justified. Further wording changes were suggested, and one representation objected to building on land adjacent to Branscombe close.

In response, changes have been made to Policy PPL4 and its supporting text. 'Suitable Alternative Natural Green Space', 'Functionally Linked Land', and 'Water Quality' sections have been added to the supporting text, and paragraph 7.25 has been updated to add reference to the Environment Act 2021, the NPPF, and Natural England guidance and metrics. The Policy wording has been amended to clarify requirements with regard to Habitats Regulations Assessments and mitigation efforts. Greater detail has also been provided with regard to SANGs. Further to this, reference has been added to the current guidelines from The Chartered Institute of Ecology and Environmental Management (CIEEM).

Policy PPL4a: Biodiversity Net Gain in Tendring

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
276	3975	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	Extra protections should be in place for sites where previous surveys etc have demonstrated areas rich in habitats and biodiversity. e.g. Lifehouse Station Road site, which identified numerous protected species on the site which was rejected for development at appeal and at the High Court. Closer working between TDC and Essex Wildlife to designate sites for protection and inclusion onto local wildlife sites register. Where on site BNG contributions cannot be accommodated, there should be an emphasis on providing the BNG contribution within the district, rather than through the purchase of BNG credits for sites elsewhere in the country.	Support	Whilst comments are noted surveys of this nature become out of date within a relatively short amount of time. It is important that an HRA is carried out as defined in policy. The Council is currently arranging a review of LoWS and this will be published in due course and any findings will become material planning considerations. Comments on BNG are understood but this is determined nationally, and the Council is unable to dictate where these are purchased.
349	4307	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Comments from health partners *error on PPL4, comments meant for PPL4a – see below Rep 4305 See further comments in submission – summary is a request for clarity around the % of BNG and also a more flexible approach for Healthcare uses.	Comment	These comments are noted. Wording has been amended to provide greater clarity regarding the % of BNG. With regards to the ICB's request for greater flexibility to the BNG % for healthcare uses it is considered that this cannot be supported as it could result in a harmful precedent being set.
262	5217	Great Bromley Parish Council (Lizzie Ridout, Clerk) [262]	There is support for the 20% Biodiversity Net Gain requirement, but BNG should be delivered on-site wherever possible. Additionally, green corridors and buffer zones should be incorporated into strategic sites, and detailed flood-risk and surface-water mitigation measures should be included from the outset.	Comment	The policy already requires that mitigation is made onsite where possible, before considering offsite. Therefore, this is already covered within the policy. With regards to the other points they are covered within other policies in the Plan. The Plan should be read as a whole.
6	13463	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor –	Anglian Water would like to comment on the proposed 20% Biodiversity Net Gain (BNG) requirements in this policy. Whilst we recognise the intention behind targeting a higher net gain requirement than the mandatory 10%, we are concerned that applying the new target to Anglian Water developments would not achieve the intended outcomes. BNG requirements cannot be met onsite for projects where Anglian Water is not the landowner as 30-year	Comment	With regards to the request for greater flexibility to the BNG % for water related uses it is considered that this cannot be supported as it could result in a harmful precedent being set.

		Sustainable Growth) [6]	habitat management cannot be guaranteed. For example, linear pipeline schemes frequently cross multiple landownerships. These projects often have minimal impact on biodiversity, but when the full length of a scheme is considered, BNG requirements are already significant. In cases where Anglian Water is the landowner, scope for achieving BNG onsite is limited by the needs of site operations and the need to consider future infrastructure upgrades. There is no justification in the supporting text to support the reasoning behind the 20% uplift, and this only references the statutory 10% uplift in BNG. Whilst a 20% uplift might be viable for other development types where onsite BNG is feasible (such as new housing allocations), it does not reflect the realities of delivering water or sewerage infrastructure projects. The policy does not read correctly as the '20% increase in biodiversity value' is stated as 'in line with the national minimum requirement'. The additional BNG units required under this proposal, would need to be sourced offsite, increasing costs to our customers and extending the timelines to deliver new water infrastructure. This additional burden does not consider the significant biodiversity and nature recovery benefits being delivered by our proposed infrastructure upgrades and WINEP schemes in AMP8 – which will help to deliver sustainable growth and improve the ecological quality of catchments and aligns with the Government's 25 Year Environment Plan ambitions and wider agenda. We request that the Council considers the impact of 20% BNG for all development types, and the impacts this requirement would have on the timely delivery of essential infrastructure to support the Council's growth ambitions. We suggest that essential infrastructure improvements where there is no scope for BNG onsite should be exempt from the new 20% BNG requirement and only the mandatory 10% BNG should be met where development proposals qualify for BNG.		
1654	13494	Natural England (Jonathan Burt) [1654]	We welcome the 20% BNG target which will contribute towards nature recovery across Tendring and support the aims and ambitions of the Essex LNRS. We are supportive of plans to establish habitat banks in the district (para 7.30) noting the benefits this can have for local biodiversity, e.g. by expanding habitats and/or enhancing connectivity. Where BNG is proposed on or adjacent to a designated site, a prior discussion with Natural England will be needed to ensure that proposals	Support	These comments are welcomed.

			are suitable and that any necessary consents are obtained.		
823	13544	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	This policy supports the delivery of both Biodiversity Net Gain (BNG) and the Essex LNRS priorities. It sets out clear expectations to prioritise onsite habitat creation and support strategic Habitat Banks for off-site provision that reinforce ecological connectivity and LNRS opportunity areas. -site habitat creation, and support strategic Habitat Banks for off-site provision that reinforce ecological connectivity and LNRS opportunity areas. The 20% requirement is ambitious and aligns positively with the Essex BNG viability report, demonstrating local leadership in nature recovery and ensuring developments contribute meaningfully to multifunctional GI networks. However, this ambition may create challenges for certain development types, such as small sites), especially if emerging NPPF updates reduce or change national BNG expectations, so the policy may need to clarify flexibility mechanisms, thresholds, or exceptions where on-site delivery is demonstrably unviable. Although Uttlesford Local Plan was able to incorporate the requirement for 20% “Development proposals will be required to demonstrate a minimum of 20% Biodiversity Net Gain calculated using the most recent Statutory Metric.” The policy confirms that biodiversity measures will be secured through a legal agreement and/or planning condition, a position supported by paragraph 7.25 (page 137), which states that the Biodiversity Gain Plan will be secured by condition. Paragraph 7.27 (page 138) further requires that biodiversity net gains are maintained for 30 years and secured through planning conditions, obligations, or conservation covenants. However, the supporting text or policy does not explicitly reference the need for Habitat Management and Monitoring Plans (HMMPs), and/ or Landscape and Ecological Management Plans (LEMPs), which are essential for ensuring long-term stewardship and measurable outcomes for both BNG and GI long-term stewardship and measurable outcomes	Comment	These comments are noted and are reflected in the updated Local Plan.
148	14478	Environment Agency (Environment Agency) [148]	PPL4a’s requirement for at least 20% Biodiversity Net Gain (BNG) is welcomed, exceeding the national minimum and demonstrating strong ambition. However, it lacks explicit reference to river-specific biodiversity gains. While rivers and watercourses are mentioned, there is no clear expectation to prioritise riparian corridors for habitat enhancement, despite their importance in the LNRS. The policy should require developers to assess and deliver river and riparian habitat improvements where possible,	Comment	Comments are noted, however it is considered that highlighting one type of habitat over another would not be appropriate and it is the case that the Local Plan should be read in conjunction with the LNRS, which may be subject to change within the plan period so should not be specifically mentioned within policy.

			including measurable BNG for riverine habitats such as riparian buffers, channel naturalisation and floodplain function, in accordance with the LNRS. (PLEASE REFER TO THE ATTACHED DOCUMENT FOR REWORDING SUGGESTIONS)		
826	14494	Essex Wildlife Trust (Annie Gordon) [826]	We strongly support the Council's decision to require 20% BNG for all qualifying development, exceeding the national minimum of 10% mandated by Schedule 14 of the Environment Act 2021. This demonstrates genuine ecological ambition and, if effectively implemented, will contribute meaningfully to nature recovery across the District. We also support the policy's requirement that BNG is delivered on-site in the first instance, with off-site provision and statutory credits as successively less preferred options, and the Council's commitment to supporting the establishment of habitat banks linked to the LNRS. Nevertheless, we have a number of specific concerns about the policy as drafted. The policy does not explicitly address the treatment of irreplaceable habitats within BNG calculations. The Environment Act 2021 and NPPF paragraph 193(c) make clear that irreplaceable habitats — including ancient woodland and ancient or veteran trees, as well as habitats such as coastal saltmarsh, lowland raised bog, blanket bog, and saline lagoons — cannot be compensated through BNG. Development resulting in the loss or deterioration of such habitats should be refused unless there are wholly exceptional reasons and a suitable bespoke compensation strategy exists. It is essential that the plan makes this explicit so that the 20% BNG requirement is not misunderstood as providing a mechanism for the development of irreplaceable habitats. We recommend that PPL4a is amended to include a clear statement to this effect, cross-referencing the specific irreplaceable habitat types present in Tendring District. The policy states that off-site BNG may be delivered through registered habitat banks or through purchase of statutory credits, with the Council supporting the establishment of habitat banks within the District. We support this in principle but recommend that the policy should require that off-site BNG is preferentially located within, or at a minimum contributes to the aims of, the LNRS strategic opportunity areas for Tendring. Without this spatial direction, there is a risk that off-site BNG is	Comment	Comments on the location of BNG are understood, but this is determined nationally, and the Council is unable to dictate where these are purchased. The ISA Report has been updated to reflect the position of irreplaceable habitats within site assessments and the assessment of the policy framework. Whilst we acknowledge the comments with regards to monitoring, there is no requirement for this currently under national guidance. However, this will be considered within Ch.11 Monitoring and Review as to whether we will review monitoring it within the AMR going forward.

			delivered in locations that are remote from the main ecological priorities of the District and provide little strategic benefit for nature recovery. There is currently no requirement in the policy or supporting text for the Council to maintain and publish a public BNG register, or to include BNG delivery as a specific indicator in Annual Monitoring Reports. In our view, robust monitoring and transparent reporting of BNG outcomes are essential if the policy is to be credible. The Council should commit, either in the policy text or in a supporting SPD, to maintaining a publicly accessible record of all BNG plans, gains secured, and long-term management agreements, and to reporting on BNG delivery annually.		
Businesses, Landowners and Developers					
88	3852	Stanfords (Miss Mollie Foley) [88]	The response argues that the blanket 20% BNG requirement is unrealistic, inflexible, and risks making many sites unviable. It highlights that applying 20% to all developments, regardless of size, constraints, or baseline ecology, will stall applications, suppress SME delivery, and push developers toward exempt areas. The policy is seen as disproportionate, inconsistent with national direction toward more exemptions, and likely to distort the market by creating a two-tier system. High off-site costs and limited habitat unit supply further threaten viability, delivery, and overall plan effectiveness.	Comment	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
705	4080	Mr Peter Le Grys [705]	Provision of 20% gain is unrealistic and not viable, particularly for schemes up to 20 dwellings	Object	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
1336	4339	Pigeon [1336]	There is no evidence provided with emerging TDLPR to explain or justify a 20% biodiversity net gain requirement in Tendring, above the national mandatory 10% requirement. There is no assessment of the impact of a higher requirement on the viability of development of a higher requirement. It is requested that the biodiversity net gain requirement is set at 10% and consistent with the national requirement.	Object	Whilst these points are noted, the Council has undertaken a Viability Assessment which is an iterative process which will inform the next stage of the Local Plan.
1638	4434	Lichfields (Amy Jones,	Our client strongly objects to this policy. The 20% BNG requirement is neither justified nor consistent with national policy (NPPF paragraph 36 tests of soundness) or	Object	Essex County Council has commissioned two reports to evaluate the feasibility of requiring developers to achieve a 20% BNG, an increase from a proposed minimum 10% figure. These reports, funded by government grants, will be shared with developers,

		Planner) [1638]	legislation. Our client considers that in line with the statutory BNG provisions and national planning policy, draft Policy PPL4a should require 10% BNG to be delivered in accordance with the statutory metric. There appears to be a lack of supporting evidence within the evidence base to justify the higher percentage.		planners, and scheme promoters to serve as an evidence base for advocating enhanced BNG. For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points • Essex BNG Evidence for Need • Essex BNG Viability Final Report
431	4456	Welbeck Strategic Land [431]	The statutory minimum requirement for Biodiversity Net Gain is established through the Environment Act 2021 and associated statutory instruments. The Council should not be seeking to modify this statutory requirement to require more than the 10% Biodiversity Net Gain associated with eligible developments. Accordingly, reference to 20% Biodiversity Net Gain being achieved for all sites should be deleted from Strategic Policy PPL4a. The only exception is Tendring Colchester Boarders Garden Community where a 20% target is required to be achieved.	Object	Essex County Council has commissioned two reports to evaluate the feasibility of requiring developers to achieve a 20% BNG, an increase from a proposed minimum 10% figure. These reports, funded by government grants, will be shared with developers, planners, and scheme promoters to serve as an evidence base for advocating enhanced BNG. For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points • Essex BNG Evidence for Need • Essex BNG Viability Final Report
1422	4462	M Scott Properties Ltd (Scott Properties) [1422]	The policy proposes a Biodiversity Net Gain (BNG) requirement of a min of 20%, which exceeds the statutory minimum of 10% established through the Environment Act 2021. It is considered the proposal for 20% BNG risks undermining the delivery of housing and employment sites allocations. Therefore, at present the policy is not considered to be justified or effective and unsound as set out in paragraph 36 of the NPPF 2024. The policy should align with the statutory 10% BNG requirement as set out in the Environment Act 2021.	Comment	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
1713	13673	City & Country [1713]	Policy PPL4a Biodiversity Net Gain in Tendring, requires: "Development proposals that qualify for BNG will be expected to deliver a minimum 20% increase in biodiversity value relative to the predevelopment biodiversity of onsite habitat within the development site to meet the biodiversity objective in line with the national minimum requirement. " As it stands it is unclear from the proposed wording whether the policy requires the delivery of a minimum 20% increase' or if the development needs to meet the '(10%). If a 20% net gain is intended, this approach is not supported. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Under this legislation, developments are required, at a minimum, to	Comment	Whilst these comments are noted, it is considered that the new NPPF is only a draft and can only be given limited weight at this stage. Essex County Council has commissioned two reports to evaluate the feasibility of requiring developers to achieve a 20% BNG, an increase from a proposed minimum 10% figure. These reports, funded by government grants, will be shared with developers, planners, and scheme promoters to serve as an evidence base for advocating enhanced BNG. For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points • Essex BNG Evidence for Need • Essex BNG Viability Final Report

			deliver a BNG of 10% to meet the biodiversity gain objective (save where exemptions apply). If an uplift to 20% is to be required, this needs to be supported by sufficient evidence to justify this approach. This evidence has not been provided. Planning Practice Guide states the following: "Plan makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented. " Policy N1 of consultation draft NPPF 2025 states, development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. In respect of plan preparation draft Policy PM6 indicates that plan-makers should not duplicate, substantively restate or modify the content of national decision-making policies. Furthermore, at paragraph 2 of Annex A of the draft NPPF in respect of implementation, it is quite clear that: "Development plan policies which are in any way inconsistent with the national decision making policies in this framework should be given very limited weight, except where they have been examined and adopted against this framework. " While it is acknowledged that the NPPF is only in draft form at the present time, it clearly represents a direction of travel and is expected to be published in summer 2026 with immediate effect. Therefore, in accordance with the Council's LDS, it will be a material consideration of substantial weight before the draft Plan is submitted for examination. Given the wording of Policy N1, it must be concluded that draft policy PPL4a is unnecessary and as such should be deleted.		

			It is particularly difficult to achieve Biodiversity Net Gain of 20% on small to medium sites (between 10-300 dwellings), due to the space limitations within the site. Therefore, if this policy is to remain within the Local Plan, it is critical that the policy is amended to only relate to strategic allocations and garden villages that are larger than 500 dwellings in size. Otherwise, this could result in significant delays to housing delivery on smaller and medium sized sites, which is not justified or a sound approach in planning terms and conflicts with the objectives of the NPPF to boost housing delivery. Further to the above, due to the difficulty delivering BNG on small and medium sites, the policy should be reworded to support the purchase of BNG units for these sites.		
134	13683	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The increase in the minimum BNG requirement to 20% will place an increased burden on development and reduce the prospect of sites coming forward for development. Such an increase will lead to other unintended and unwanted design pressures. The policy also conflicts with new national draft BNG policy that limits the requirement to 10%.	Object	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
1439	13889	Catesby Estates [1439]	Catesby broadly support the objective of Draft Policy on Biodiversity Net Gain ('BNG') in Tendring, and the commitment to enhancing biodiversity alongside development. The Site will be designed to deliver measurable biodiversity net gain, integrated with the proposed 52.65ha of multi-functional green and blue infrastructure. However, Catesby note that the policy seeks a 20% increase in biodiversity value, which exceeds the current national minimum requirement of 10%, as set out in the Environment Act 2021. Requiring a higher target than the national minimum would place an unnecessary burden on developers, risk deliverability, and may conflict with the principle of proportionate planning obligations. Any policy requirement above 10% should therefore be fully justified by the Council through site-specific ecological evidence, viability assessment, and in accordance with national policy, rather than being applied as a blanket standard. Catesby therefore strongly suggest that this policy is amended to ensure it is fully aligned with national policy.	Comment	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.

119	14062	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	HBF objects to the policy requiring major developments to deliver 20% Biodiversity Net Gain, arguing it is unjustified and contrary to national guidance. The Environment Act sets a 10% statutory requirement, and the draft NPPF and PPG make clear higher targets should only apply to specific allocations where robust evidence on need, opportunity and viability is provided. No such justification is included. HBF contends residential development is not the primary driver of biodiversity decline and warns that a 20% requirement could harm viability, particularly where off-site delivery is required. The policy should revert to the statutory 10% requirement.	Comment	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
1471	14141	Stanfords (Beth Deacon-Bates, Head of Planning) [1471]	We support biodiversity enhancement and recognise that development must already meet the statutory Biodiversity Net Gain requirements. However, we believe PPL4a is unjustified. It duplicates national legislation, adds an unproven 20% local requirement, and creates unnecessary complexity when Policy PPL4 and the existing legal framework already cover assessment, mitigation and net gain. In my view, this extra layer offers no clear Tendring-specific justification and risks burdening applicants and decision-makers. We therefore consider Policy PPL4a should be deleted.	Comment	Essex County Council has commissioned two reports to evaluate the feasibility of requiring developers to achieve a 20% BNG, an increase from a proposed minimum 10% figure. These reports, funded by government grants, will be shared with developers, planners, and scheme promoters to serve as an evidence base for advocating enhanced BNG. For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points • Essex BNG Evidence for Need • Essex BNG Viability Final Report
674	14262	AWG Landholdings [674]	New Strategic Policy PPL4a relates to the delivery of Biodiversity Net Gain (BNG), requiring development proposals to deliver a minimum of 20% BNG. However, national legislation sets out a mandatory BNG requirement of 10% under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The requirement at New Strategic Policy PPL4a to achieve BNG of 20% therefore goes beyond national policy and legislative requirements, and no clear justification has been provided for this significant uplift. Whilst our client appreciates the ambitious BNG targets, AWG Land Holdings Ltd are concerned that the proposed policy requirement has not been demonstrated to be justified, viable, or deliverable. Without robust justification, this draft policy could constrain development, particularly on smaller scale sites. New Strategic Policy PPL4a is therefore considered unsound, particularly in respect of the tests of justification and effectiveness. As such, it would be helpful to have some further justification relating to the 20% BNG requirement. Overall, it is considered that the emphasis of the policy should be on achieving the national policy and legislative requirements, whilst encouraging an increase beyond this	Object	Essex County Council has commissioned two reports to evaluate the feasibility of requiring developers to achieve a 20% BNG, an increase from a proposed minimum 10% figure. These reports, funded by government grants, will be shared with developers, planners, and scheme promoters to serve as an evidence base for advocating enhanced BNG. For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points • Essex BNG Evidence for Need • Essex BNG Viability Final Report

			where possible. This approach would better support smaller scale developments and would help ensure the proposed policy is sound. We reserve the right to comment further on the policy wording within future stages of Local Plan consultation.		
1647	14291	The Planning Bureau (Miss Natasha Styles, Senior Planning Associate) [1647]	The Council should not set a higher biodiversity net gain (BNG) requirement for development in Tendring than that set out in the Environment Act 2021. Requiring BNG above 10% does not meet the tests set out in paragraph 57 of the NPPF and in particular a greater than 10% requirement is not necessary to make the development acceptable in planning terms and a 10% requirement should be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF). The Council should also note that the recently finalised Planning Policy Guidance on Biodiversity Net Gain at paragraph: 006 Reference ID: 74-006-20240214 confirms that 'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented'. The Council should also note draft policy N1 of the NPPF published in December 2025 that states 'Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Therefore a 10% requirement should also be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF) and consistent with national policy guidance. The Council should also reconsider the additional wording it proposes with regard to BNG to ensure the policy is in line with the guidance and statutory instruments that the government have recently updated / published regarding statutory Biodiversity Net Gain. The Council should then amend the preferred options so that it is consistent with	Comment	Whilst these comments are noted, it is considered that the new NPPF is only a draft and can only be given limited weight at this stage. Essex County Council has commissioned two reports to evaluate the feasibility of requiring developers to achieve a 20% BNG, an increase from a proposed minimum 10% figure. These reports, funded by government grants, will be shared with developers, planners, and scheme promoters to serve as an evidence base for advocating enhanced BNG. For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points • Essex BNG Evidence for Need • Essex BNG Viability Final Report

			any updated guidance and regulations. Recommendation For the policy to be consistent with national policy and legislation the Council should: • Only seek a minimum of 10% Biodiversity Net Gain • Reconsider the additional policy wording to ensure it is consistent with recently published legislation and planning guidance.		
1718	14315	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning object to the requirement to deliver a 20% increase in biodiversity value relative to the predevelopment biodiversity. This compares to the statutory 10%. This is a significant burden on developments and in our view, may not be viable in many parts of Tendring. This will frustrate the delivery of housing sites, particularly smaller ones where there is less opportunity to mitigate onsite. Therefore, we see no justification for the 20% BNG requirement.	Object	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
1692	14351	Lewis & Scott Homes [1692]	We OBJECT to the blanket requirement for 20% BNG across all developments and across the whole district. This is not consistent with current national policy, as clarified in the NPPG at Paragraph: 006 Reference ID: 74-006-20240214 or in emerging national policy at proposed policy N1 of the draft NPPF. Of particular relevance is the NPPG, which (at the reference given above) advises that 'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.' Neither the plan nor the evidence base provide this justification. (See attached document for proposed changes)	Object	Whilst these comments are noted, it is considered that the new NPPF is only a draft and can only be given limited weight at this stage. Essex County Council has commissioned two reports to evaluate the feasibility of requiring developers to achieve a 20% BNG, an increase from a proposed minimum 10% figure. These reports, funded by government grants, will be shared with developers, planners, and scheme promoters to serve as an evidence base for advocating enhanced BNG. For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points • Essex BNG Evidence for Need • Essex BNG Viability Final Report
1541	14358	M Scott Properties Ltd (Martin Scott) [1541]	It is considered that draft Policy PPL4a is unnecessary and in conflict with national policy, and as such should be deleted.	Comment	Whilst these comments are noted, it is considered that the new NPPF is only a draft and can only be given limited weight at this stage. Essex County Council has commissioned two reports to evaluate the feasibility of requiring developers to achieve a 20% BNG, an increase from a proposed minimum 10% figure. These reports, funded by government grants, will be shared with developers,

					planners, and scheme promoters to serve as an evidence base for advocating enhanced BNG. For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points • Essex BNG Evidence for Need • Essex BNG Viability Final Report
53	14383	M Scott Properties Ltd [53]	Scott Properties state that the requirement in Policy PPL4a for a 20% biodiversity net gain is unjustified, insufficiently explained, and unsupported by evidence of viability. National guidance indicates that exceeding the statutory 10% requirement should only occur where clearly justified, evidenced, and deliverable, which has not been demonstrated. The policy is also considered inconsistent with emerging national policy, which discourages duplication or modification of national standards. It is therefore concluded that Policy PPL4a is unnecessary, conflicts with national policy, and should be deleted.	Comment	Whilst these comments are noted, it is considered that the new NPPF is only a draft and can only be given limited weight at this stage. Essex County Council has commissioned two reports to evaluate the feasibility of requiring developers to achieve a 20% BNG, an increase from a proposed minimum 10% figure. These reports, funded by government grants, will be shared with developers, planners, and scheme promoters to serve as an evidence base for advocating enhanced BNG. For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points • Essex BNG Evidence for Need • Essex BNG Viability Final Report
1722	14401	Stanfords (Mollie Daniels) [1722]	A blanket 20% Biodiversity Net Gain requirement is overly rigid and impractical, failing to account for site-specific constraints such as size, location, baseline ecology, and viability. It risks making many developments unviable, particularly on brownfield or urban sites, and may discourage applications, especially from smaller developers. The requirement would compound existing planning burdens and increase reliance on costly off-site units with limited supply. It also diverges from emerging national policy trends toward flexibility, risking reduced delivery and market distortion. Overall, the policy should be more flexible and viability-sensitive to avoid undermining development and plan delivery.	Comment	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
774	14412	Trinity College [774]	Objection to 20% BNG requirement	Object	Noted.
982	14424	Turley (Claire Newbury, Associate Director) [982]	Policy PPL4a sets out a requirement for new development to deliver a minimum increase of 20% in biodiversity value which considerably exceeds the current national minimum requirement of 10%, as set out in the Environment Act 2021. Whilst Catesby supports the delivery of biodiversity net gain, in principle, as part of new development, Catesby are concerned that imposing a materially higher BNG target than the national minimum may place an unnecessary additional burden on development, with a resultant risk to deliverability and/or impact upon other necessary obligations. The imposition of a BNG requirement of 100% greater than that required at the national level, may also conflict with the general principle of proportionate planning	Comment	Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.

			obligations. Any policy requirement above the mandatory 10% should therefore be fully justified by the Council at the site-specific level, having regard to prevailing national policy.		
Community of Representatives					
953	3511	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
1337	3992	Captain Andrew Rudge [1337]	While I support the bulk of this policy I disagree with the 4th paragraph - "Any residual BNG requirement that cannot be met on-site can be delivered off-site either on land in the control of the developer/landowner outside of the development site." This would allow the developer of any sites around the Walton Backwaters such as SAH3 to deliver BNG off site, while degrading our jewel the Walton Backwaters and adjacent land. The plan / policies should protect the backwaters, rare species including Fisher's Estuarine Moth and Sea Hogs fennel found in the hedgerows in the fields designated to SAH3	Support	Whilst this representation is noted, the backwaters already have the highest level of protection within the District. It is not the case that off site BNG creation would be allowed to harm this protected area.
642	13770	Mrs S Jenkins [642]	Residents did support 20% BNG which would have potential to improve nearby fields in line with the Essex LNRS biodiversity strategic opportunity areas.	Support	Noted.
1318	14095	Elizabeth Artindale [1318]	A 20% biodiversity gain will not be achieved by enhancing existing hedgerows as suggested.	Comment	Whilst this comment is noted, this is not what is suggested within Policy PPL4.

Policy PPL4a: Biodiversity Net Gain in Tendring

Summary of Representations

Representations for Policy PPL4a include a mix of support, comments, and objections. The ICB asked for greater clarify on the percentage of BNG and greater flexibility for healthcare uses. Other representations called for extra protections for certain habitats, criticised the 20% uplift of BNG, and proposed changes to the wording of PPL4a. Some representations also suggested the policy is not aligned with national planning policy and asked for further justification for the 20% uplift. Other representations suggested that BNG should be a requirement on-site, rather than off-site.

In response, changes have been made to the policy wording of PPL4a to clarify the text about minimum BNG percentages. Wording regarding flexibility of the policy has also been amended for clarity. No further amendments are required.

Policy PPL5: Water Conservation, Drainage and Sewerage

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
1110	3828	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We support Policy PPL5; we would suggest however that for any new developments over 10 dwellings, a bond should be introduced on developers to ensure that all drainage, and sewage works are completed to the full and in accordance with the Water companies requirement so that they can be fully adopted when the development is completed. This will address the problems that residents of the Hopkins Homes development in Harwich Road Mistley have been experiencing, which include flooding and raw sewage surfacing in their bathrooms; Anglia Water will not adopt because Hopkins have not completed the required works.	Support	Whilst these issues are understood, it is considered that the proposed solution falls outside of the planning system and could not therefore be included in the Local Plan.
276	3973	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	Existing sewerage infrastructure and systems cannot currently cope with the levels of development in the area. Thorough surveying of the systems for full upgrade and overhaul of the entire sewerage system for the district should take place before any major development. In Thorpe Le Soken, accessible public foul sewers should not be relied upon to support new development as the sewerage system here is at capacity and recent development that has relied upon existing systems has resulted in over spill and systems baking up into properties (e.g Lady Nelson Gardens Development and Thorpe Hall Gardens development.)	Support	The Local Plan is accompanied by an Infrastructure Delivery Plan which identifies which infrastructure (including waste) will be needed to make the Plan sound. The IDP has been updated in support of the Regulation 19 Version of the Local Plan.
349	4308	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Whilst all health facilities have to try and obtain BREEAM Excellent for new builds, it is worth noting that some specialised health facilities are not always able to achieve the BREEAM water credits (especially WAT01). Due to the nature of the specialist facilities and the service users, safety has to be paramount, and this makes achieving all 5 credits for WAT01 more difficult. Achieving all of the Water credits for extensions and redevelopment due to the nature of the works and would suggest that special consideration is taken for health projects on a case-by-case consideration.	Comment	These points are valid and additional wording will be added to Policy.
254	7121	Elmstead Parish Council (Angela Baxter, Clerk) [254]	Surface-water flooding is not addressed adequately.	Comment	This is considered within the Council's Strategic Flood Risk Assessment and again at application stage.

6	13464	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water is supportive of the principle of development at this location. However, to ensure that connections are appropriately phased and environmentally robust, we recommend that appropriate planning conditions are imposed, so development is phased with in step with delivery of the required sewerage infrastructure. Anglian Water supports the policy requirements for non-residential buildings to meet the specifications outlined for the BREEAM water calculator credits in clause 1.b. However, whilst the water efficiency standard of 100 litres per person per day (l/p/d) in clause 1a is moving in the right direction, we recommend that the Council introduces more robust water efficiency standards that can help make development across the district more water efficient and allow sustainable growth, to align with the Shared Standards for Water Efficiency in Local Plans?. We support the requirement for SuDS in all new development – we agree with the 'SuDS first' approach, consistent with the surface water drainage hierarchy. All surface and foul water flows should be separated. Under no circumstances will surface water be permitted to discharge into a separate foul sewer or to a combined sewerage system via a new connection. Existing connections to a combined sewer through redevelopment of a brownfield site, should provide betterment in terms of reduced flows to the combined sewer network. In terms of wastewater treatment, we agree with the policy requirement to ensure applicants can demonstrate that there is adequate provision available in our networks and our receiving WRCs to accommodate and treat wastewater flows arising from the development.However, we would request that the sentence "Private sewage treatment facilities will not be permitted if there is an accessible public foul sewer" is either removed or amended. As previously raised, we have some small WRCs with descriptive permits that are only designed to serve the small number of properties within their catchment and not designed to accommodate additional cumulative growth. These 'descriptive works' are therefore unlikely to be suitable to accommodate future growth. In addition, we would welcome the inclusion of a policy	Comment	It is unclear which site is being specifically mentioned here, however comments are welcomed and we assume this in relation to the large garden village sites, which will be subject to design briefs at a later date. Officers did consider a more strict standard, however this has proven to be unviable. The wording around private treatment facilities has been carried forward.

			requirement that ensures existing utilities are factored into the layout and design of new development.		
6	13478	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Strategic and Medium Housing Allocations Anglian Water considers that proposals for these allocations will need to have regard to all relevant policies in the Local Plan, including the new Strategic Policy PPL5 Water Conservation, Drainage and Sewerage, which should adequately address the sewerage and drainage needs of these allocation policies, should the amendments we have sought are included. We support policy references that require the applicant to demonstrate adequate wastewater capacity to the satisfaction of Anglian water and the Council, and where this is reinforced by measures to reduce capacity measures on the receiving WRC. The Tendring Water Cycle Study has outlined where there are capacity concerns at our WRCs. In addition, we advise early engagement with Anglian Water to identify whether there are sustainable points of connection (SPoC) into our network. Our engineers will identify a sustainable point of connection to our network (or sustainable points of connection depending on phasing) to avoid these constraints. Anglian Water appreciates that the Water Cycle Study is prepared with the latest available information at the time of publication. We advise that the latest dry weather flow information for 2025 has been verified for submission to the Environment Agency, and we are able to share this information should this be required to inform a future iteration of the Water Cycle Study.	Comment	Comments are noted and an amendment has been made to the sentence on private wastewater facilities. The SuDS Design Guide and Essex Water Strategy was also added to text.
1654	13495	Natural England (Jonathan Burt) [1654]	We welcome the lower water efficiency standards of 100 l/p/d. NE recommends standards as set out in the shared-standards-in-water-efficiency-for-local-plans.pdf. The nature recovery and protection obligations for local plans in relation to water scarcity are set out in Annex D of the Shared Standards in Water Efficiency for Local Plans. Recommended policy wording around water efficiency, for inclusion in Local Plans, is set out in the Shared Standards in Water Efficiency for Local Plans.	Support	This support is noted.
823	13545	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	This policy is welcomed for the design of Sustainable Drainage Systems (SuDS) as multifunctional features that support wider green and blue infrastructure benefits. Like Policy PPL1: Development and Flood Risk to state the design to consider GBI in accordance with Policy PPL4 and to reference the use of naturalised SuDS. It should also include reference to the Essex SuDS Design Guide along with the Water Strategy for Essex that the policy	Comment	The references made to the Essex SUDS Design Guide and the Water Strategy for Essex are both sound advisories and have been taken forward.

			already referenced. It is suggested that some, or all, of the following evidence be reviewed and included within the 'Justification' section for higher standards for water efficiency, to supplement the Tendring evidence. The water efficiency targets outlined in Policy PPL5 exceed current Part G Building Regulations, so detailing the extensive evidence from government bodies, ECC and industry stakeholders which recommends stricter efficiency requirements will be valuable to establish why such an approach is necessary for Tendring . Among the emerging evidence which encourages more stringent standards than those in Part G is the Water Ready report, published in 2024 by the Future Homes Hub. This report recommends that water stressed areas adopt 90 l/p/d by 2030 and 80 l/p/d in water stressed areas by 2035. Essex is a water stressed area. The Shared Standards in Water Efficiency for Local Plans was published in June 2025 as part of a joint initiative developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East to support Local Planning Authorities (LPAs) to deliver sustainable growth. The water company partners are Anglian Water, Cambridge Water, Essex and Suffolk Water and Affinity Water. The Shared Standards provide advice and evidence to LPAs on how they can secure higher water efficiency standards for new homes and commercial developments. The Shared Standards document is a regional piece of work which encompasses Essex and its level of water stress in its evidence-based recommendations. It sets out model policy for local plans to adopt, which provides targets for both residential and non-residential buildings. These include a target 85 l/p/d for new residential development. For new non residential buildings, full credits within the 4 categories for the BREEAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development. The Water Strategy for Essex (2024) is also valuable piece of evidence which highlights the need for a stringent policy approach to address water scarcity in Essex. It		

			brings together literacy, shares data and challenges from a range of partners on natural flood management and water conservation, and water scarcity and quality issues for the next 30 years at the county level, and focuses on 30 recommendations linked to reducing demand water; changing land use for water; and future water supply options. (See full text for comments regarding 7.35 and 7.32)		
258	14173 Duplicate email rep 13607 deleted	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We strongly encourage the adoption of this new policy as it addresses a key shortfall in infrastructure.	Support	Noted.
148	14510	Environment Agency (Environment Agency) [148]	We welcome that Policy PPL5 treats water supply and demand strategically, promotes water-efficient design, includes non-residential BREEAM requirements, requires early and completion-stage evidence, and encourages engagement with the water company. These broadly align with the Shared Standards document. The proposed 100 l/p/d standard is noted as a pragmatic approach. However, the policy could be strengthened by referencing relevant legislation, addressing low flows and agricultural pressures, and using the WCS/IWMS to justify targets. Greater clarity is suggested on verification, design statement content, and inclusion of AMR monitoring to support effective delivery.	Comment	Support for this policy is noted, and the WCS has been updated to provide a robust evidence base in support of the Submission Version of the Local Plan. Recommendations around AMR monitoring will be considered as part of the Council's monitoring processes
148	14511	Environment Agency (Environment Agency) [148]	We recommend separating water supply and wastewater into distinct policies or clearly defined sections for clarity. While we welcome recognition of funding mechanisms for WWTW upgrades, delivery may not align with plan timelines, so close working with AWS and development phasing may be needed. The requirement to demonstrate adequate sewage provision is supported. Supporting text should reference legal obligations, clarify capacity issues, and emphasise early engagement with AWS. Definitions of capacity should be included, and up-to-date assessments required. Pre-application engagement should apply across all development to protect water quality and support Local Plan infrastructure objectives. (PLEASE SEE ATTACHED DOCUMENT FOR REWORDING SUGGESTIONS)	Comment	Suggested comments are noted and already exist within the policy wording.
148	14528	Environment Agency (Environment Agency) [148]	To ensure effectiveness, we recommend the Council monitor delivery of Policy PPL5 through its Authority Monitoring Report (AMR), such as reporting the proportion of new homes meeting the l/p/d standard and non-residential schemes achieving BREEAM water credits.	Comment	The WCS has been updated to provide a robust evidence base in support of the Submission Version of the Local Plan. Recommendations around AMR monitoring will be considered as part of the Council's monitoring processes

			This aligns with Shared Standards recommendations on monitoring to demonstrate policy performance.		
Businesses, Landowners and Developers					
88	3853	Stanfords (Miss Mollie Foley) [88]	The response argues that Policy PPL5 is overly onerous, requiring detailed water-use calculations, technical specifications, and certification that fall within Building Regulations rather than planning. It highlights that the policy demands disproportionate information for all developments, blurs regulatory boundaries, and imposes requirements, such as full BREEAM water credits, beyond normal planning practice. It also notes that no statutory consultee is responsible for reviewing the technical information the policy requires, leaving planners to assess matters outside their expertise. Overall, the policy is seen as impractical, duplicative, and unjustified.	Comment	Essex is one of the Country's most dry areas yet also prone to flooding in many areas. This Policy recognises these competing pressures and sets out a clear achievable approach to water use. Officers consider this to be a balanced approach to a technical subject.
705	4081	Mr Peter Le Grys [705]	The requirements should not exceed national prescribed levels. No justification has been put forward to require the higher standards suggested.	Comment	Essex is one of the Country's most dry areas yet also prone to flooding in many areas. This Policy recognises these competing pressures and sets out a clear achievable approach to water use. Officers consider this to be a balanced approach to a technical subject.
1638	4438	Lichfields (Amy Jones, Planner) [1638]	Our client objects to the specified water usage limit and considers the policy should be re-drafted to allow for flexibility, with any limit to water usage being based on up to date, site specific evidence available at the time of a planning application. Water companies/by extension TDC would not be justified in placing requirement on developers to demonstrate capacity in line with Water Industry Act. The capacity of infrastructure must be tested as part of the plan making process and is not the responsibility of applicants at the planning application stage. Policy should therefore be re-drafted.	Object	Essex is one of the Country's most dry areas yet also prone to flooding in many areas. This Policy recognises these competing pressures and sets out a clear achievable approach to water use. Officers consider this to be a balanced approach to a technical subject.
134	13684	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The policy should not overlap with Building Regulations requirements to cap water usage. The policy also requires detailed water usage assessments at an unspecified "earliest stage", which is unclear and would unnecessarily restrict adaptability at sales stage. The policy also appears to be inconsistent with Policy LP4 as to when SUDS measures are required. The policy is also unclear as to when private sewerage treatment facilities may be acceptable.	Object	In regards to the comments on private wastewater, the policy has been amended to clarify this. Amendments have also been made on the wording "must be submitted with the planning application" to remove the words "earliest stage". Whilst comments on SuDS are noted the Plan should be read as a whole and it is considered that no conflict exists between the policies.
1439	13890	Catesby Estates [1439]	Catesby broadly support Draft Strategic Policy PPL5, particularly the objectives to ensure sustainable use of water resources, incorporation of Sustainable Drainage Systems ('SuDS'), and protection of the water environment. The Site will be designed to incorporate appropriate water efficiency measures, SuDS, and ensure connectivity with green and blue infrastructure in line with the policy objectives.	Comment	Essex is one of the Country's most dry areas yet also prone to flooding in many areas. This Policy recognises these competing pressures and sets out a clear achievable approach to water use. Officers consider this to be a balanced approach to a technical subject.

			However, Catesby consider that the policy as currently drafted requires a disproportionately high degree of detailed design information, including calculations, fixture specifications, and pre occupation verification. Such requirements are more suitably addressed through planning application submissions, conditions, and technical approvals. Catesby would welcome clarification on how these requirements would be applied to outline planning applications, where detailed design information is not yet finalised. In addition, the policy requirement that proposals must demonstrate adequate sewage disposal capacity should not form part of the Local Plan policy, as this is more appropriately addressed through planning conditions or informatives at the application stage, in consultation with the relevant water and sewerage undertaker. Including this as a policy requirement could unnecessarily restrict flexibility and delay housing delivery. Catesby therefore suggest that the policy be amended to focus on the strategic objectives and principles of water efficiency and SuDS.		
119	14063	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	As there is no evidence that water supply in Tendring is an issue that is preventing development from coming forward the requirement for new residential development is designed to utilise no more than 100 lppd should be amended to 110 lppd to reflect the lower threshold in PPG. Consequently, the requirement in part 2, 3 and 4 should also be deleted as achieving the 110 lppd is addressed through building regulations. The final paragraph should be deleted. Development proposals should not have to demonstrate that adequate sewage disposal exists at the point of application. The provision of sewage disposal is the responsibility of the water provider who has a statutory responsibility to provide these services and connect new homes to the waste water network. Section 106 of the WIA 1991 confers a power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer. It is therefore inappropriate to include a policy in the local plan requiring a housebuilder, or other applicants for	Comment	Whilst the comments here are recognised, Tendring District is within a water stressed area which suffers from flooding as well as droughts. The Council is therefore justified in having a stricter water efficiency standard. It should also be noted that the Council tested the viability of an even stricter standard as promoted by ECC, however this was found to be unviable. It is considered that the policy as written provides the necessary clarification for developers and applicants, which is supported by EA and Anglian Water.

			development, to assess the capacity or otherwise of the water company to provide waste water connections as they are an attempt to get applicants to do things for which they are not legally responsible. Rather it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for such services relating to the development requirements proposed in local plans. If the Council cannot show that there is sufficient waste water infrastructure to meet the level of development set out in the local plan, then it cannot be considered to be deliverable.		
1471	14143	Stanfords (Beth Deacon-Bates, Head of Planning) [1471]	We believe Policy PPL5 is disproportionate and should be deleted. It requires detailed water-use calculations, design evidence and certification that properly sit within Building Regulations, not planning. By duplicating national standards and demanding highly technical assessments for all developments—regardless of scale—it creates an unnecessary burden for applicants and planners. There is no clear justification, no proportionality, and no appropriate consultee to review such information. Planning policy should set outcomes, not replicate building-control processes.	Comment	Essex is one of the Country's most dry areas yet also prone to flooding in many areas. This Policy recognises these competing pressures and sets out a clear achievable approach to water use. Officers consider this to be a balanced approach to a technical subject.
1722	14402	Stanfords (Mollie Daniels) [1722]	Policy PPL5 imposes overly onerous and disproportionate requirements for water efficiency, extending beyond the appropriate role of planning into Building Regulations territory. It requires detailed calculations, technical specifications, and certification that are normally assessed through Part G compliance, creating duplication and inefficiency. Applying these requirements to all developments, regardless of scale, lacks proportionality and places unnecessary burdens on applicants, particularly for minor schemes. The requirement for full BREEAM credits is also excessive. Furthermore, no suitable statutory consultee exists to assess this information, leaving uncertainty in decision-making. Overall, the policy should be simplified to focus on high-level outcomes consistent with planning's remit.	Comment	Essex is one of the Country's most dry areas yet also prone to flooding in many areas. This Policy recognises these competing pressures and sets out a clear achievable approach to water use. Officers consider this to be a balanced approach to a technical subject.
Community Representatives					
953	3512	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
981	3606	Ms Danielle Williams [981]	The Plan does not provide clear evidence that foul sewerage and surface water infrastructure in Wrabness has sufficient capacity to accommodate an additional 30 dwellings. Rural settlements can experience network	Object	These comments relate to site MSA28 which will have its own detailed assessment at application stage. Moreover, the allocated sites within this draft of the Local Plan were the subject of a Infrastructure Delivery Plan which considered these issues.

			constraints, particularly during periods of heavy rainfall when systems are under pressure. No site-specific assessment or confirmation from the sewerage undertaker is referenced to demonstrate that the development can be served without risk of overflow or water quality impact. Without robust infrastructure evidence and identified mitigation, the allocation appears premature and inconsistent with the requirement to ensure adequate capacity before growth proceeds.		
1352	4068	Mrs Paula Bland [1352]	Existing drainage issues must be resolved and water conservation (with this area being the driest part of the UK) must be resolved and planned for before any development commences.	Comment	Essex is one of the Country's most dry areas yet also prone to flooding in many areas. This Policy recognises these competing pressures and sets out a clear achievable approach to water use. Officers consider this to be a balanced approach to a technical subject.
581	4134	Mrs Sally Webb [581]	the water supply to Tendring has been overstretched for years, there is no where to gain a further supply to Tendring; the plans to build so many new houses will not be able to go ahead without a fresh water supply.	Support	The Local Plan is accompanied by an Infrastructure Delivery Plan which addresses these issues.
1318	14096	Elizabeth Artindale [1318]	Suggested remedies for a huge amount of wastewater and sewerage (Where there is none now) are open to developers ignoring their obligations by stating "where feasible" and "demonstrated no alternative option exists". The easy and cheap option is to discharge into the rivers.	Comment	Whilst this is an issue for the Environment Agency to investigate, the Local Plan does not allow for this.

Policy PPL5: Water Conservation, Drainage and Sewerage

Summary of Representations

Representations for PPL5 included a mix of support, objections, and comments. Lawford Parish Council suggested there be a bond to ensure all drainage and sewage are provided alongside development. Thorpe-le-Soken Parish Council argued existing sewerage infrastructure cannot cope with increased development. The ICB commented that not all health facilities can achieve BREEAM Excellent status. Anglian Water suggested planning conditions are imposed to phase development with the required sewerage infrastructure and also recommended a more robust water efficiency standard. Anglian Water also suggested changes to wording around private sewage treatment facilities. Other representations argued flooding is not addressed adequately, suggested changes to the policy wording, recommended evidence, and suggested AMR monitoring. Developers argued the policy is impractical, duplicated, and not justified.

In response, changes have been made to the supporting text and policy wording of PPL5. The supporting text has been amended to clarify where infiltration may not be appropriate for groundwater quality. The policy wording has also been updated to include the Essex Water Strategy and the Sustainable Drainage Systems Design Guide for Essex. The updated policy has deleted the text 'at the earliest stage' regarding the submission of Water Efficient Design Statements and also amended text with regard to private wastewater facilities.

Policy PPL6: Strategic Green Gaps

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
90	13442	Tendring Parish Council (Mrs Marie Snell, Clerk/RFO) [90]	The Parish Council reiterates its concerns regarding risk of coalescence between villages.	Comment	The Council understands concerns regarding village coalescence and, therefore, have promoted new Green Gaps.
46	13488	Manningtree Town Council (Mrs Ruth Louise Frost, CLERK) [46]	TRINITY ROAD, MISTLEY - There was an application to build on this green space site a few years ago which was refused. - The reasons for refusal were the effect the proposal would have on the character and appearance of the area, particularly as it is within a Green Gap area and a conservation area. It would be good to know what has changed as both of these still exist. - It is a concern with the current pressures from the government to increase the number of housing, that the reasons for the refusal previously will get overlooked. With all the proposed development for Manningtree, and the surrounding areas Mistley I encourage the council to ensure that any development is in keeping with the local environment and that appropriate measures are taken to mitigate negative impacts. This should include adequate parking provision, protection of green spaces, and consideration for residents' quality of life. I would also ask that the council considers the views of local residents before making a final decision.	Comment	Whilst the Council can not comment on specific planning applications, Members have made it clear that the protection of existing Green Gaps should be a priority. To this end, the Council has updated its a Strategic Green Gap study in support of the Regulation 19 version of the Local Plan.
258	14174 duplicate email rep 13608 deleted	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	Whilst not a new policy we very strongly support this policy but understand the need to use this sparingly and after careful consideration so not to dilute the Strategic nature of the policy.	Support	This support is welcomed.
Businesses, Landowners and Developers					
1215	3913	Pigeon [1215]	The land identified at Sladbury's Lane as part of the 'Strategic Green Gap' does not fulfil the role under Policy PLL6. It does not prevent settlement coalescence, and therefore not justified and should be reviewed and removed.	Object	The evidence in support of Strategic Green Gaps has been reviewed and updated, and is published on the Council's website. The Council is satisfied that the principle of a Strategic Green Gap in this location remains sound.

			A planning application has been submitted for the development of land to the north and south of Sladbury's Lane (26/00355/OUT). The proposals include a country park provided to the south, retaining a green gap. This extensive area of publicly accessible open space would provide a green gap to be retained in perpetuity, and it would represent a significant long-term benefit to the community.		
567	7110	Britton Developments Ltd [567]	Land north of Progress Way, Little Clacton should be removed from the Strategic Green Gap and allocated for around 99 homes. The site is an urban fringe location, well-contained by development and infrastructure, and does not meet Green Gap criteria or meaningfully prevent settlement coalescence. Evidence, including the Council's Landscape Impact Assessment, indicates the land can accommodate development with limited impact. The proposal is presented as a logical, sustainable extension to the settlement that would support housing supply without undermining the wider Green Gap function.	Comment	Whilst the Council can not comment on specific planning applications, Members have made it clear that the protection of existing Green Gaps should be a priority. To this end, the Council has updated its a Strategic Green Gap study in support of the Regulation 19 version of the Local Plan.
828	13636	Welbeck Strategic Land IV LLP [828]	We object to the proposed identification of a new Strategic Green Gap between Elmstead Market and the Tendring Colchester Borders Garden Community (TCBGC). As set out below, there is no justified requirement for such a designation in this location, and the extent of the proposed Green Gap is unreasonable - should the Council persist with it - the boundaries should be redrawn. Furthermore, we consider that Policy PPL6 should not be classified as a strategic policy.	Object	It is considered that there is pressure of coalescence between the Tendring Colchester Borders Garden Community and the village of Elmstead Market. This has the potential to impact the unique character of both settlements. The Council considers that Strategic Green Gaps are not solely a development management tool, but a key component of the spatial strategy. Their primary purpose is to prevent settlement coalescence and maintain settlement identity; however, they also play an important role in shaping the distribution and form of growth, particularly where new gaps are defined alongside site allocations. For this reason, the Council considers it appropriate to designate the Strategic Green Gaps policy as a strategic policy.
726	13655	A H Brown Farms [726]	Policy PPL6 of the emerging Local Plan relates to Strategic Green Gaps. It is stated that Strategic Green Gaps will be protected in order to retain separate identity and to prevent the coalescence of settlements. In terms of their location, as shown on the policies map, the emerging Local Plan identifies: • A green gap between Kirby Cross, Walton on the Naze and Kirby-Le-Soken • A green gap between Dovercourt and Little Oakley • A green gap between Elmstead Market and Colchester and Tendring Garden Community Of the green gaps proposed, Clacton is particularly constrained by green gaps, with strategic green gaps to the east, north and west of the settlement. This appears to have the aim of maintaining a gap between Jaywick Sands, Great Holland, Little Clacton and Clacton. The	Object	Clacton has seen a significant level of growth throughout the adopted Plan period. A number of large scale applications have been approved with build out rates reaching beyond the end of the proposed Plan period. It is considered that it is the saturation of build out, rather than the availability of land, which is preventing any future development in the Clacton area. Indeed, the Green Gaps that are carried over from the adopted Local Plan have been in existence throughout the adopted Local Plan period with no real impact on development in and around Clacton. With regard to the Policy not being in accordance with the NPPF, it is considered that, where the NPPF is silent on a matter, the Local Plan can fill in that gap. Moreover, it is for Local Plans to provide a Local context to planning policy which seems right and justified.

			resulting impact of this policy is that it seeks to restrict development in the most sustainable and logical locations in the District. In this regard Clacton-On-Sea, Jaywick Sands, Holland-On-Sea and Dovercourt are all identified as Strategic Urban Settlements at the top of the Settlement hierarchy, which are correctly identified as the most sustainable locations for growth. However, in reality growth in and around all of these settlements is then constrained by the Strategic Green Gap Policy, which seeks to restrict growth in and around these settlements. The sustainability of these locations is reflected in the past precedent that when Tendring cannot demonstrate a Five-Year Housing LandSupply a number of major consents have been granted on Strategic Green Gaps. The supporting text and justification for the Strategic Green Gap policy is very limited and consists of a single paragraph (7.36) within the emerging Local Plan. There is no reference within the supporting text to either the NPPF or the Strategic Objectives of the Local Plan. In this regard, the NPPF does not have any requirement in terms of provision for Green Gaps. Paragraph 143 of the NPPF sets out that in respect to land within the Green Belt, the Green Belt serves five purposes including purpose b, which is to prevent neighbouring towns merging into one another. Tendring District does not contain any Green Belt and there is no reference within the NPPF to preventing coalescence between settlements or maintaining gaps between settlements for land that is not situated within the Green Belt. Therefore, it is not clear how policy PPL6 relates to the NPPF and it is not considered to be justified in planning terms, and it does not accord with national policy. The impact of this policy appears to have resulted in Tendring District proposing a number of garden settlements, which for reasons explained previously in this letter is not considered to be the most appropriate strategy when considered against the alternatives. The Strategic Green Gap Policy, which has been carried over from the Adopted Local Plan, has resulted in new growth being directed away from the most sustainable settlements, which is not consistent with the settlement hierarchy. It places an unnecessary and unjustified restriction on new development within Strategic Green Gap locations, which does not accord with national policy. Therefore, in order for the emerging Local Plan to		

			be sound, Policy PPL6 should be deleted from the Local Plan and the proposals map updated accordingly.		
1713	13674	City & Country [1713]	Policy PPL6 of the emerging Local Plan relates to Strategic Green Gaps. It is stated that Strategic Green Gaps will be protected in order to retain separate identity and to prevent the coalescence of settlements. In terms of their location, as shown on the policies map, the emerging Local Plan identifies: • 3 strategic green gaps in and around Clacton, • A green gap between Kirby Cross, Walton on the Naze and Kirby-Le-Soken • A green gap between Dovercourt and Little Oakley • A green gap between Elmstead Market and Colchester and Tendring Garden Community Of the green gaps proposed, Clacton is particularly constrained by green gaps, with strategic green gaps to the east, north and west of the settlement. This appears to have the aim of maintaining a gap between Jaywick Sands, Great Holland, Little Clacton and Clacton. The resulting impact of this policy is that it seeks to restrict development in the most sustainable and logical locations in the District. In this regard Clacton-On-Sea, Jaywick Sands, Holland-On-Sea and Dovercourt are all identified as Strategic Urban Settlements at the top of the Settlement hierarchy, which are correctly identified as the most sustainable locations for growth. However, in reality growth in and around all of these settlements is then constrained by the Strategic Green Gap Policy, which seeks to restrict growth in and around these settlements. The sustainability of these locations is reflected in the past precedent that when Tendring cannot demonstrate a Five-Year Housing Land Supply a number of major consents have been granted on Strategic Green Gaps. The supporting text and justification for the Strategic Green Gap policy is very limited and consists of a single paragraph (7.36) within the emerging Local Plan. There is no reference within the supporting text to either the NPPF or the Strategic Objectives of the Local Plan. In this regard, the NPPF does not have any requirement in terms of provision for Green Gaps. Paragraph 143 of the NPPF sets out that in respect to land within the Green Belt, the Green Belt serves five purposes including purpose b, which is to prevent neighbouring towns merging into one another. Tendring District does not contain any Green Belt and there is no reference within the NPPF to preventing coalescence between settlements or maintaining gaps between settlements for land that is notsituated within	Comment	Clacton has seen a significant level of growth throughout the adopted Plan period. A number of large scale applications have been approved with build out rates reaching beyond the end of the proposed Plan period. It is considered that it is the saturation of build out, rather than the availability of land, which is preventing any future development in the Clacton area. Indeed, the Green Gaps that are carried over from the adopted Local Plan have been in existence throughout the adopted Local Plan period with no real impact on development in and around Clacton. With regard to the Policy not being in accordance with the NPPF, it is considered that, where the NPPF is silent on a matter, the Local Plan can fill in that gap. Moreover, it is for Local Plans to provide a Local context to planning policy which seems right and justified.

			the Green Belt. Therefore, it is not clear how policy PPL6 relates to the NPPF and it is not considered to be justified in planning terms, and it does not accord with national policy. The impact of this policy appears to have resulted in Tendring District proposing a number of garden settlements, which for reasons explained in Section 3 of this statement is not considered to be the most appropriate strategy when considered against the alternatives. The Strategic Green Gap Policy, which has been carried over from the Adopted Local Plan, has resulted in new growth being directed away from the most sustainable settlements, which is not consistent with the settlement hierarchy. It places an unnecessary and unjustified restriction on new development within Strategic Green Gap locations, which does not accord with national policy. Therefore, in order for the emerging Local Plan to be sound, Policy PPL6 should be deleted from the Local Plan and the proposals map updated accordingly. City & Country are promoting land at Foots Farm (Site Reference SGG11), which is situated in a very sustainable location to the west of Thorpe Road and to the north of Centenary Way, Clacton. The site could accommodate at least 200 dwellings, and it could be delivered in the short term. This site would provide a very logical allocation for growth, but it is not being allocated, which appears to be predicated on its location within a Strategic Green Gap. As explained within Section 14 below, the site could be delivered without resulting in any significant reduction in the Green Gap between Clacton and Little Clacton, but in any event removal of the Strategic Green Gap policy would enable Tendring to increase their supply of houses within the most sustainable locations for growth, such as Foots Farm.		
1713	13688	City & Country [1713]	Notwithstanding the absence of a national policy basis for the Strategic Green Gaps (set out in section 8), it is considered that the development of Foots Farm would not result in an unacceptable impact on the Green Gap between Clacton and Little Clacton. Figure 4, below, shows the approximate distances between the western edge of the site and the eastern boundary of the Green Gap. Setting aside the northern section of the site, to the east of Foots Farm, a Green Gap width of between 700m and 1.1km would still be	Comment	Whilst the Council can not comment on specific planning applications, Members have made it clear that the protection of existing Green Gaps should be a priority. To this end, the Council has commissioned a new Green Gap study in support of the Regulation 19 Version of the Local Plan.

			maintained should development come forwards on the southern part of the site. The distance between Clacton and Little Clacton and the Green Gap in-between would reduce to around 300m should the northernmost portion of the site be developed on; however, this narrowing is not atypical to other Green Gaps across the district. In the event Foots Farm is developed, the minimum distance between the two settlements of Clacton and Little Clacton will not be reduced. As the crow flies, the Green Gap between Clacton and Little Clacton is as little as around 140m (Figure 5). The Green Gap to the east of Clacton is around 156m at its pinch point. Other examples of narrow Green Gaps within the district include the land between Lawford and Manningtree, which has sections of Green Gap measuring approximately 130m (Figure 6). The gap extent between Clacton and Jaywick is also around 188m at the narrowest point.		
1508	14279	Gladman Developments Ltd (Matthew Jones, Senior Policy & Promotions Planner) [1508]	There is broad support for the principle of preventing settlement coalescence, but Policy PPL6 applies Green Gaps too rigidly, unnecessarily constraining sustainable development. The Plan should use a more flexible, proportionate approach that better reflects settlement identity, which is influenced by built form, character and signage, not just open land. The Strategic Green Gap affecting Long Road, Mistley is disputed, as surrounding development has already compromised the visual and physical separation it is intended to protect. The area lacks the undeveloped character described in policy and does not function as a true Green Gap. The submission requests a review of Green Gap boundaries to support sustainable growth while still preventing coalescence.	Comment	Comments are noted, the Council has commissioned a review of all green gaps within the District in support of the Regulation 19 version of the Local Plan. This document provides an evidence base for Policy PPL6 as well as the strategic green gaps identified in the Local Plan.
Community Representatives					
953	3513	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
1066	3751	Mr Gavin Tuff-Lacey [1066]	Sprawl of rural communities must be protected against.	Support	Noted, that is what this Policy attempts to do.
1116	3951	Mrs Rosaline Weaver [1116]	I understand that the purpose of a Strategic Green Gap along Harwich Road is to prevent the coalescence of settlements. However, along this stretch of road there is already continuous built form, with houses on at least one side throughout. The proposed gap is, in practice, only a 72-metre separation between the last house in Ramsey	Comment	Whilst these comments are noted, it is considered that these smaller gaps in the District are the most important to protect.

			(100 Harwich Road) and the first house in Little Oakley (84 Harwich Road). In my view, that is too limited to function as a meaningful break between settlements. The merger of Ramsey and Little Oakley has already taken place.		
1334	3956	Mrs Gillian Cullen [1334]	Tendring must plan for 1,063 homes annually, so land should not be sterilised unless it performs a clear strategic function. The narrow parcel at Foulton Hall is already influenced by houses, agricultural buildings and surrounding development. All of the land is in a 30 mph zone with bus stops, street lights, pavements, sewers etc. It should therefore be left available for the future development needs of the Harwich peninsula, particularly given the surrounding constraints on growth, including coastal protection to the south, the explosives factory exclusion zone to the west and the sewage works to the north.	Comment	These comments are noted, the amount of land set aside for green gaps in the District is minimal and does not affect the deliverable land for housing. Moreover, it is considered that the development site in Dovercourt already provides for a significant level of housing in this area. Therefore additional sites are not required at this stage.
1341	3979	Mrs Laura Gray [1341]	The proposed Strategic Green Gap at Harwich Road contains seven houses, six agricultural buildings and is only two fields wide at its broadest. It's flanked by Sea View Avenue to the west and the proposed 1,650-home development to the east, so it no longer provides the open separation the policy is intended to protect. The strip is narrow, fragmented and already partly developed, giving little visual or physical break between settlements. If the concern is the setting of Grade II listed Foulton Hall, that should be addressed through existing heritage policies, not an over-broad Strategic Green Gap designation.	Comment	These comments are noted, the amount of land set aside for green gaps in the district is minimal and does not affect the deliverable land for housing. Moreover, it is considered that the development site in Dovercourt already provides for a significant level of housing in this area. Therefore additional sites are not required at this stage.
1352	4069	Mrs Paula Bland [1352]	We already have green gaps - the countryside. These proposals are removing what already exists. Its imperative that as much as possible is retained.	Comment	The Green Gaps are an additional layer of protection on top of countryside designations.
581	4136	Mrs Sally Webb [581]	Green gaps are disappearing as it is.... if Horsley Cross goes ahead it will end up swallowing Bradfield.	Comment	This Garden Village will be subject to a design brief at a later stage where the impact on landscape will be considered, including coalescence.
922	4244	Mr Anthony Barsoum [922]	I support the inclusion of the strategic green gaps adjacent to Trinity Road in Manningtree/Mistley, both Trinity Fields and the allotments. Trinity Fields is a vital green space which: - preserves the space between the settlements of Manningtree, Mistley and Lawford - is home to many species of wildlife and birds - contributes to the attractive nature of the area, allowing for uninterrupted views from the junction of Long Road and Trinity Road down to the town and across to Suffolk	Support	The support for this Policy is welcomed.
1387	4245	Mrs Natalie Keep [1387]	I support the inclusion of the strategic green gap adjacent to trinity Road in Manningtree/ Mistley. This green space along with the surrounding allotments are critical to the social wellbeing, future proofing & sustainability, biodiversity & protection of wildlife for the local and	Support	Noted.

			surrounding residents and visitors to the area. It is vital we give space to and celebrate these green gaps and the diverse enrichment that they provide.		
1417	4388	Mr reginald tricker [1417]	is Weeley really needing to be "separate" to Weeley heath? If so, should a strategic green gap be in place along Weeley Brook/railway to enforce this, like between the Heath and Little Clacton?	Comment	The Council has commissioned a review of all green gaps within the District in support of the Local Plan. This document provides evidence and justification for the Green Gaps identified in the Local Plan.
920	4395	Mr Stephen Jones [920]	Strategic Green Gaps are essential to maintaining a sense of place, space and community identity under the pressure of the essential housing development that is required to meet the current need locally and nationally. I am particularly concerned that the Strategic Green Gap between the historic settlements of Mistley, Manningtree and Lawford is protected from any encroachment from the very extensive residential housing development that is taking place to the south of the designated area. Green space is of proven benefit to human wellbeing and a haven for biodiversity of flora and fauna.	Support	This comment is welcomed.
144	13957	Ms Julia Barrington-Fuller [144]	Object to Tendring District Council's proposal to designate land owned by family as Green Space, Local Green Space or Strategic Green Gap. The land is not publicly accessible, demonstrably special, or a valued community resource, nor does it have recreational, ecological, historic or landscape significance. It is a small, partly developed field currently used for grazing and previously associated with horticulture and planned housing. The designation appears intended solely to prevent development and is inconsistent with planning policy, given existing coalescence between Little Clacton and Weeley Heath. The proposal is factually flawed, unfair, and would unjustly restrict appropriate development; it should be withdrawn or subject to formal inquiry.	Object	There is pressure between Little Clacton and Weeley Heath for further development which has the potential to impact the character of these areas and cause coalescence. The Council has commissioned a review of all green gaps within the District in support of the Local Plan. This document provides evidence and justification for the Green Gaps identified in the Local Plan. It should be noted that green gaps are not designated for nature conservation or public access rights but purely to prevent coalescence of neighbouring settlements.
687	13958	Mr Nigel Barrington-Fuller [687]	Object to Tendring District Council's proposal to designate land owned by family as Green Space, Local Green Space or Strategic Green Gap. The land is not publicly accessible, demonstrably special, or a valued community resource, nor does it have recreational, ecological, historic or landscape significance. It is a small, partly developed field currently used for grazing and previously associated with horticulture and planned housing. The designation appears intended solely to prevent development and is inconsistent with planning policy, given existing coalescence between Little Clacton and Weeley Heath. The proposal is factually flawed, unfair, and would unjustly restrict appropriate development; it should be withdrawn or subject to formal inquiry.	Object	There is pressure between Little Clacton and Weeley Heath for further development which has the potential to impact the character of these areas and cause coalescence. The Council has commissioned a review of all green gaps within the District in support of the Local Plan. This document provides evidence and justification for the Green Gaps identified in the Local Plan. It should be noted that green gaps are not designated for nature conservation or public access rights but purely to prevent coalescence of neighbouring settlements.
1667	14026	Adrian Robert Fuller [1667]	I object to adding a field in Weeley Heath to green space.	Object	There is pressure between Little Clacton and Weeley Heath for further development which has the potential to impact the character of these areas and cause coalescence.

					The Council has commissioned a review of all green gaps within the District in support of the Local Plan. This document provides evidence and justification for the Green Gaps identified in the Local Plan. It should be noted that green gaps are not designated for nature conservation or public access rights but purely to prevent coalescence of neighbouring settlements.
1682	14224	David Fuller [1682]	I object to adding a field in Weeley Heath to green space PPL6	Object	There is pressure between Little Clacton and Weeley Heath for further development which has the potential to impact the character of these areas and cause coalescence. It should be noted that green gaps are not designated for nature conservation or public access rights but purely to prevent coalescence of neighbouring settlements. The Council has updated its Strategic Green Gaps Study in support of the submission version of the Local Plan.
428	14426	Mr N Neale [428]	These representations seek the removal of Land South of Church Hill, Ramsey from the Strategic Green Gap and its allocation for around 50 dwellings, arguing that the site is a contained settlement-edge parcel whose release would not undermine the wider separation role of the gap. See attached doc for further detail.	Comment	It is understood that a key requirement from members for the local plan was to preserve or enhance the green gaps that already exist within the district. It is also considered the local plan as drafted can identify the requisite amount of housing so it therefore it is not needed to degrade green gaps for new housing sites. The Council has commissioned a review of all green gaps within the District in support of the Local Plan. This document provides evidence and justification for the Green Gaps identified in the Local Plan.
1738	14454	Mr D Akers [1738]	Amend the Policies Map to remove the Strategic Green Gap designation from this parcel. The site does not perform the Strategic Green Gap's core separation function between Great Clacton and Holland-on-Sea: it is enclosed by existing development on two sides and by established boundary vegetation on the remaining edges, and development would not undermine the key physical "threshold" features which define separation across the wider area (including the railway line, Picker's Ditch, pylons, and the larger open field structure beyond). The Green Gap Study confirms that the separation role varies across the designation, and that settlement identity/pattern is only partially distinct in this location.	Comment	Whilst comments are noted, this application has been allowed at Appeal, where the Planning Inspector found that the loss of Green Gap was only marginal. In any event the Appeal site has now been granted and therefore this needs no further consideration.

Policy PPL6: Strategic Green Gaps

Summary of Representations

Representations submitted for Policy PPL6 included a mix of support, objections, and comments. Several comments expressed concerns about village coalescence and development on strategic green gaps. Several comments were made in reference to specific green gaps, suggesting that development should be allowed on the land. Other representations argue the policy is too constraining on development, recommending PPL6 be more flexible.

In response, no changes have been made to Policy PPL6 or its supporting text. The Strategic Green Gaps study has been updated in support of the Submission Version of the Local Plan.

Policy PPL7: Archaeology

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
705	4084	Mr Peter Le Grys [705]	Policy should not refer to 'non-designated' remains. The policy is otherwise arbitrary, excessive and open to unjustified requirements by ECC Place Services.	Object	While this representation is noted, the Council is satisfied that the policy is robust, proportionate, and evidence based. The policy has been informed by extensive supporting evidence and has been reviewed by Historic England, which did not identify any significant concerns or recommend substantive changes. On this basis, the Council does not consider it necessary to amend the policy at this time.
1439	13891	Catesby Estates [1439]	Catesby broadly support Draft Non-Strategic Policies PPL7, PPL8, PPL9, and PPL9a. These policies provide an appropriate framework for the protection, retention, and enhancement of heritage assets, including archaeological remains, Conservation Areas, listed buildings, registered parks and gardens, and non-designated heritage assets. The policies align with the principles set out in the NPPF, ensuring that any development affecting heritage assets is informed by appropriate assessments, proportionate mitigation, and sensitive design. They appropriately recognise that harm to or loss of heritage assets should only be permitted where the public benefits of the development clearly outweigh the harm or loss, in line with the NPPF.	Support	This support here is welcomed.
Community Representatives					
953	3514	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1520	13809	The Harwich Society (Richard Colley) [1520]	2.1 The Harwich Society supports the thrust of policies seeking to protect the historic environment relating to: PPL7 Archaeology PPL8 Conservation Areas PPL9 Listed Buildings PPL9a Non Designated Heritage Assets We agree it is important that the unique heritage assets that make places distinctive and special are protected and enhanced. The Harwich Society is pleased that Conservation Areas are mapped in this edition of the draft Local Plan.	Support	The support here is welcomed.

Members of the Public					
581	4137	Mrs Sally Webb [581]	Sensible	Support	The support here is welcomed.

Policy PPL7: Archaeology

Summary of Representations

The representations on Policy PPL7 generally support the protection of designated and non-designated archaeological remains from new development. However, there is some concern from Mr Peter Le Grys regarding the policy's reference to non-designated archaeological remains. The Harwich Society supports the non-strategic policies (PPL7, PPL8, PPL9 and PPL9a), which seek to protect the historic environment. They agree that the unique heritage assets that make places distinctive and special should be protected and enhanced, and they welcome the inclusion of Conservation Area mapping within the Local Plan draft. Catesby Estates also supports these non-strategic policies (PPL7, PPL8, PPL9 and PPL9a), acknowledging that they provide an appropriate framework for the protection, retention and enhancement of heritage assets. Furthermore, they state that the policies align with the principles set out in the NPPF. In particular, they recognise that development affecting heritage assets should be informed by appropriate assessment, mitigation and sensitive design, and that harm to, or loss of, heritage assets should only be permitted where the public benefits outweigh the negative impacts of development.

In response, the Council welcomes the support for Non-strategic Policy PPL7 and does not seek to make any changes.

Policy PPL8: Conservation Areas and Registered Parks and Gardens

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
276	3974	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	Screening measures, such as locally appropriate tree belts and/or hedgerows, must be provided along site boundaries but should not be relied upon as the only mitigation strategy for preventing the erosion of the heritage setting. Buffer zones to prevent development from taking place within a designated distance from the boundary of such settings should also be considered to preserve the character of conservation areas, heritage assets and registered parks and gardens.	Comment	Whilst this is all understood, it is considered that these kinds of mitigation already exist within the SPL Policies of this Plan and to impose such requirements at this Policy would be confusing to applicants.
Businesses, Landowners and Developers					
1439	13892	Catesby Estates [1439]	Catesby broadly support Draft Non-Strategic Policies PPL7, PPL8, PPL9, and PPL9a. These policies provide an appropriate framework for the protection, retention, and enhancement of heritage assets, including archaeological remains, Conservation Areas, listed buildings, registered parks and gardens, and non-designated heritage assets. The policies align with the principles set out in the NPPF, ensuring that any development affecting heritage assets is informed by appropriate assessments, proportionate mitigation, and sensitive design. They appropriately recognise that harm to or loss of heritage assets should only be permitted where the public benefits of the development clearly outweigh the harm or loss, in line with the NPPF.	Support	This support here is welcomed.
Community Representatives					
953	3515	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1520	13810	The Harwich Society (Richard Colley) [1520]	The Harwich Society recommends that Conservation Area Policy PPL8 is reviewed. The policy should be more aspirational and encourage enhancement of the public realm. In the District some Conservation Areas are looking forlorn due to shabby streets and spaces that detract from the setting of groups of listed buildings and historic features. An aspiration for public realm improvement should provide a benchmark for public bodies, utility providers and developers whenever repairs, maintenance and investment is in prospect in	Comment	Whilst these comments are understood, it is considered that each of the District's conservation area appraisals already do this.

			Conservation Areas, to match the expectations placed on the owners of heritage properties.		
Members of the Public					
581	4138	Mrs Sally Webb [581]	Excellent	Support	Noted.
1318	14093	Elizabeth Artindale [1318]	This will massively impact the area surrounding a Grade I listed building with increased traffic movement, pollution which screening cannot mitigate.	Comment	Whilst these comments are noted, this Policy does not consider specific development sites.

Policy PPL8: Conservation Areas and Registered Parks and Gardens

Summary of Representations

The representations received on Policy PPL8 broadly support the protection of Conservation Areas from development, while also highlighting potential mitigation strategies that could be incorporated into the policy and suggesting ways in which it could better encourage enhancements to the public realm. Thorpe-le-Soken Parish Council recommends that additional mitigation measures be considered to support the preservation of Conservation Areas, heritage assets, and registered parks and gardens.

Catesby Estates also supports the non-strategic policies (PPL7, PPL8, PPL9 and PPL9a), noting that they provide an appropriate framework for the protection, retention, and enhancement of heritage assets. They further state that these policies align with the principles set out in the NPPF. In particular, they recognise that development affecting heritage assets should be informed by appropriate assessment, mitigation, and sensitive design, and that harm to, or loss of, such assets should only be permitted where the public benefits outweigh the adverse impacts. The Harwich Society likewise supports the non-strategic policies (PPL7, PPL8, PPL9 and PPL9a), which seek to protect the historic environment. They agree that the unique heritage assets that contribute to local distinctiveness should be protected and enhanced, and they welcome the inclusion of Conservation Area mapping within the draft Local Plan.

Within the public representations, it is suggested that extending protection to areas beyond listed buildings would increase traffic movement and, consequently, pollution. In response, the Council notes that Non-strategic Policy PPL9 deals specifically with the protection of listed buildings, and that Non-strategic Policy SPL3 more directly addresses issues relating to pollution arising from traffic; it is therefore considered that this representation more appropriately relates to those policies. Furthermore, it should be noted that the Council has in-house heritage advice for conservation areas in the form of appraisals, and that Historic England has reviewed these policies and raised no concerns.

In response, the Council welcomes the general support for Non-strategic Policy PPL8 and does not propose any changes.

Policy PPL9: Listed Buildings

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
1439	13893	Catesby Estates [1439]	Catesby broadly support Draft Non-Strategic Policies PPL7, PPL8, PPL9, and PPL9a. These policies provide an appropriate framework for the protection, retention, and enhancement of heritage assets, including archaeological remains, Conservation Areas, listed buildings, registered parks and gardens, and non-designated heritage assets. The policies align with the principles set out in the NPPF, ensuring that any development affecting heritage assets is informed by appropriate assessments, proportionate mitigation, and sensitive design. They appropriately recognise that harm to or loss of heritage assets should only be permitted where the public benefits of the development clearly outweigh the harm or loss, in line with the NPPF.	Support	This support is welcomed.
Community Representatives					
953	3516	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Support	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1520	13812	The Harwich Society (Richard Colley) [1520]	2.1 The Harwich Society supports the thrust of policies seeking to protect the historic environment relating to: PPL7 Archaeology PPL8 Conservation Areas PPL9 Listed Buildings PPL9a Non Designated Heritage Assets We agree it is important that the unique heritage assets that make places distinctive and special are protected and enhanced. The Harwich Society is pleased that Conservation Areas are mapped in this edition of the draft Local Plan.	Support	Comments noted.
1550	13978	PACE (John Hall) [1550]	This Policy ends with: "The Council will support proposals that bring heritage assets into viable use." To this statement should be added “and enable the	Comment	The Council acknowledges your comment however it is considered that applications will be determined on a case by case basis. These kinds of energy efficient standards are dealt within other policies within the plan.

			building asset to be more sustainable in terms of reducing emissions or energy use and running costs". I say this to enable Listed Buildings to be made fit for habitation and use which is often prevented by the listing such as the installation of insulation or double gazing or solar panels. If these buildings are not made sustainable then they will degrade and be lost.		
Members of the Public					
1066	3752	Mr Gavin Tuff-Lacey [1066]	This should extend to protecting the local area around listed buildings too. These are part of the wider context of the heritage.	Comment	This already exists through setting of listed buildings and conservation areas.
581	4139	Mrs Sally Webb [581]	Listed buildings that are allowed to go into decline deliberately need to be recognized by an assessment to avoid commercial exploitation.	Comment	We recognise these issues, however associated costs should be borne by the landowner. The Council has limited powers to influence this.
1318	14094	Elizabeth Artindale [1318]	This will massively impact the area surrounding a Grade I listed building with increased traffic movement, pollution which screening cannot mitigate.	Comment	Whilst these comments are noted, this Policy does not consider specific development sites.

Policy PPL9: Listed Buildings

Summary of Representations

The representations on Policy PPL9 show some support for the protection of listed buildings, while also raising concerns on matters such as extending protection beyond the listed buildings to surrounding areas, listed buildings intentionally being left to decay for commercial exploitation, and restrictions on sustainable upgrades to listed buildings. Catesby Estates also supports these non-strategic policies (PPL7, PPL8, PPL9 and PPL9a), acknowledging that they provide an appropriate framework for the protection, retention and enhancement of heritage assets. Furthermore, they state that the policies align with the principles set out in the NPPF. In particular, they recognise that development affecting heritage assets should be informed by appropriate assessment, mitigation and sensitive design, and that harm to, or loss of, heritage assets should only be permitted where the public benefits outweigh the negative impacts of development.

The Harwich Society supports the non-strategic policies (PPL7, PPL8, PPL9 and PPL9a), which seek to protect the historic environment. They agree that the unique heritage assets which make places distinctive and special should be protected and enhanced, and they welcome the inclusion of Conservation Area mapping within the draft Local Plan. PACE suggests that text be added to the policy to enable listed buildings to undergo sustainable upgrades, such as insulation, double-glazed windows and solar panels, to make the buildings habitable, as such measures are often restricted by listing requirements. Public comments also suggest extending protection to areas beyond listed buildings, as well as undertaking assessments to identify instances where listed buildings may be intentionally left to decay for commercial exploitation.

Within the public representations, it is suggested that extending protection to areas beyond listed buildings would increase traffic movement and, consequently, pollution. In response, the Council notes that Non-strategic Policy SPL3 more directly addresses issues relating to pollution arising from traffic; it is therefore considered that this representation more appropriately relates to that policy. Furthermore, it should be noted that the Council has in-house heritage advice for conservation areas in the form of appraisals, and that Historic England has reviewed these policies and raised no concerns.

In response, the Council acknowledges the comments but does not propose any changes to Policy.

Policy PPL9a: Non-designated Heritage Assets

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
1110	3829	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	We support Policy PPL9a that deals with NON-DESIGNATED HERITAGE ASSETS; we have one of these assets in our village, which is the Lawford Tye Field which has been classified as a Scheduled Ancient Monument (SAM) by Historic England. We will offer more details in the final section of our representation.	Support	This support is welcomed.
1110	4021	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	Lawford Tye Field, off Grange Road, Lawford, CO11 2JB is a Scheduled Ancient Monument (SAM). Lawford Parish Council would very much like that some protection should be granted to this field in order to preserve this unique monument and its very high significance against any development proposals The impact from a development on this SAM was one of the four main issues that Helen Heward, a Planning Inspector dismissed Planning Appeal APP/P1560/W/18/3201067 Given her very clear judgement we would therefore respectfully ask that Lawford Tye Field should be given special protection in the emerging Plan.	Comment	The comments here are noted and it is considered that further protection of this site could be allowed by the Council by the designation of Safeguarded Open Space. It is recognised that the space is used informally as public open space and the land adjacent is also protected by this same designation.
358	13549	Historic England (Andrew Marsh, Historic Environment Planning Adviser) [358]	We welcome the new non-strategic policy for non-designated heritage assets.	Support	This support is welcomed.
Businesses, Landowners and Developers					
705	4087	Mr Peter Le Grys [705]	Para 7.47 is arbitrary and unjustified. It leaves land owners open to inappropriate consideration by TDC or ECC without the opportunity for an appropriate mechanism to consider and determine whether a building is actually an asset. There needs to be an accountable process for considering whether a building or site is an asset.	Object	The designation of such assets is a separate process outside of the Local Plan preparation process. This included a number of rounds of public consultation on both the criteria to be used and the assets chosen.

1439	13894	Catesby Estates [1439]	Catesby broadly support Draft Non-Strategic Policies PPL7, PPL8, PPL9, and PPL9a. These policies provide an appropriate framework for the protection, retention, and enhancement of heritage assets, including archaeological remains, Conservation Areas, listed buildings, registered parks and gardens, and non-designated heritage assets. The policies align with the principles set out in the NPPF, ensuring that any development affecting heritage assets is informed by appropriate assessments, proportionate mitigation, and sensitive design. They appropriately recognise that harm to or loss of heritage assets should only be permittedwhere the public benefits of the development clearly outweigh the harm or loss, in line with the NPPF.	Comment	This support is welcomed.
Community Representatives					
953	3517	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1520	13811	The Harwich Society (Richard Colley) [1520]	2.1 The Harwich Society supports the thrust of policies seeking to protect the historic environment relating to: PPL7 Archaeology PPL8 Conservation Areas PPL9 Listed Buildings PPL9a Non Designated Heritage Assets We agree it is important that the unique heritage assets that make places distinctive and special are protected and enhanced. The Harwich Society is pleased that Conservation Areas are mapped in this edition of the draft Local Plan.	Support	This support is welcomed.
Members of the Public					

Policy PPL9a: Non-designated Heritage Assets

Summary of Representations

The representations on Policy PPL9a provide support, objection and comments. Lawford Parish Council asked for Lawford Tye Field, currently a Scheduled Ancient Monument (SAM), be given special protection from development in the emerging plan. Mr Peter Le Grys suggests there should be an accountable process for considering whether a building or site is an asset, stating the current policy is arbitrary and unjustified.

Catesby Estates also supports these non-strategic policies (PPL7, PPL8, PPL9 and PPL9a), acknowledging that they provide an appropriate framework for the protection, retention and enhancement of heritage assets. Furthermore, they state that the policies align with the principles set out in the NPPF. In particular, they recognise that development affecting heritage assets should be informed by appropriate assessment, mitigation and sensitive design, and that harm to, or loss of, heritage assets should only be permitted where the public benefits outweigh the negative impacts of development. The Harwich Society supports the non-strategic policies (PPL7, PPL8, PPL9 and PPL9a), which seek to protect the historic environment. They agree that the unique heritage assets which make places distinctive and special should be protected and enhanced, and they welcome the inclusion of Conservation Area mapping within the draft Local Plan.

In response, the Council welcomes the support for Non-strategic Policy PPL9a and does not seek to make any changes.

Policy PPL10a: Operational Energy and Carbon (Net Zero) in Homes and Buildings

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
349	4310	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	ESNEFT objects to requirement 4 of the policy as it appears to contradict part A of the policy in terms of its application. Part A states that "all new buildings (1 dwelling and above for residential; 100m2 floorspace and above for non residential) are required to comply with requirements 1 to 5". However, requirement 4 states that "Renewable energy must be generated on-site for all new developments ...". In order to address this concern, it is requested that that the draft Policy is amended as follows: "Renewable energy must be generated on-site for all new buildings ...". In addition, ESNEFT objects to the requirement to off-set any residual energy generation requirement that cannot be achieved on-site through a financial contribution towards energy generation elsewhere in Tendring or Essex on the grounds that such an obligation is not considered likely to meet the statutory tests for planning obligations, which must be: • Necessary to make the development acceptable in planning terms; • Directly related to the development; and, • Fairly and reasonably related in scale and kind to the development. As with the proposals for securing 20% BNG, the implications of this draft policy could have significant implications for delivering future healthcare infrastructure schemes, which could become financially unviable, thus potentially jeopardising the delivery of much needed facilities and services. Such an outcome of the draft Policy would be contrary to national planning policy, which requires Local Plans to "take into account and support the delivery of local strategies to improve health" (NPPF paragraph 98). In order to address these concerns, it is requested that healthcare developments are exempted from this policy requirement, if it is demonstrated that the requirements would comply with legislation governing planning obligations.	Comment	Whilst the comments here are noted the Policy give specific dispensation to Listed Building and in any event the policy required these changes to be made to new development rather than existing heritage assets. Health care developers should still model the building's energy requirements as required by policy and demonstrate their compliance through the Energy and/or Sustainability Statement. Much like with embodied carbon, a decision can be taken to align with either the UKNZCBS or the typologies within the policy that aligns most closely (the limits for Energy Use Intensity (EUI) and Space Heating Demand). It is understood that healthcare buildings have specialist operational requirements which may make achieving the targets more challenging, if this is the case, figures should be evidenced and justification set out Energy / Sustainability Statement. Where an energy balance cannot be achieved for the appropriate typology limit, this is where the offsetting policy is applicable (identifying the difference and calculating the contribution accordingly).
148	14479	Environment Agency (Environment Agency) [148]	New Strategic Policy PPL10a relates to Net Zero Energy and Carbon in operation. The Local Plan does not explicitly reference Ground Source Heat Pumps (GSHP) but we anticipate an increase in their installations due to the requirements of this policy. The Environment Agency regulates ground source heating and cooling systems. The system may require an abstraction licence and an environmental permit, or	Comment	This falls under different legislative requirements outside of the planning system and therefore considered the licence process will take place once permission is granted.

			exemptions may apply. Developers should engage with Environment Agency at an early stage. Risks need to be appropriately assessed and mitigated. We recommend the following guidance for applicants be referenced within the Plan: Closed loop ground source heating and cooling systems including exemption conditions and Open loop heat pump systems on gov.uk		
Businesses, Landowners and Developers					
88	3854	Stanfords (Miss Mollie Foley) [88]	The response argues that Policy PPL10a is disproportionately technical, requiring modelling and specification detail that normally occurs at Building Regulations stage rather than at planning. It highlights that applicants would need full thermal, energy-use, and renewable-generation modelling far too early, making the policy duplicative and often undeliverable. The requirement for five-year post-occupation monitoring is described as unprecedented, unenforceable, and outside the scope of planning. It also notes that no statutory consultee exists to assess the highly technical submissions the policy demands, rendering the policy procedurally unsound.	Comment	For developers that are striving to improve standards and are committed to meeting climate targets and delivering healthy, more energy efficient and climate resilient homes, the policy standards are not burdensome as they are part and parcel of good design practice. Developers should be understanding the energy performance of buildings, designing accordingly and striving to continuously improve the energy efficiency of them. The policy approach aligns with industry best practice and delivers homes and buildings by simply setting energy limits for space heating and a buildings total energy use expressed in kWh per m^2 and by requiring renewable energy generation to match demand. The limits are easily predictable throughout the design development stages and verifiable as-built. The metrics used in the policy match those recommended by the UK Climate Change Committee and those incorporated into the industry backed UK Net Zero Carbon Buildings Standard[1]. Indeed, in the Inspector's report[2] for the Uttlesford Local Plan 2021-2041 Examination, the Inspector notes at paragraph 133 that *"the use of the EUI metric is becoming more common nationally"*. The industry has already moved toward consistent energy-based metrics. The policy targets are realistic and not overly prescriptive. The policy does not duplicate or conflict with Building Regulations (which don't use energy metrics), and on the contrary, it works well by sitting alongside Building Regulations.
705	4090	Mr Peter Le Grys [705]	Such matters are better considered under the Building Regulations. The NPPF is clear that the planning system should not be used to duplicate controls better exercised elsewhere.	Object	The standards do not duplicate Building Regs / other national standards. Instead, they have been developed to provide an appropriate, justifiable and deliverable route to ensuring that new buildings are designed to achieve the necessary standards that meet climate requirements. Independent review of the national standards / Building Regs has shown that these do not provide the necessary or sufficient means to meet climate commitments and ensure that new buildings deliver the required degree of energy efficiency / other elements of building quality and performance over time. Sound, robust evidence to demonstrate this has been established for Greater Essex, and provides clear justification for the policy approach taken in PPL10a.
1638	4442	Lichfields (Amy Jones, Planner) [1638]	Policy goes beyond national standards/building regulation requirements and there does not appear to be robust justification.	Object	The standards do not duplicate Building Regs / other national standards. Instead they have been developed to provide an appropriate, justifiable and deliverable route to ensuring that new buildings are designed to achieve the necessary standards that meet climate requirements.

[1] https://www.nzcbuildings.co.uk/the-standard (NZCBS is supported by industry organisations - BBP, BRE, CIBSE, LETI, ISE, RIBA, RICS, UKGBC)
[2] https://www.uttlesford.gov.uk/media/14064/Local-Plan-Inspectors-Report/pdf/Uttlesford_Local_Plan_2021-2041_Examination_Report.pdf?m=1768841792443

					Independent review of the national standards / Building Regs has shown that these do not provide the necessary or sufficient means to meet climate commitments and ensure that new buildings deliver the required degree of energy efficiency / other elements of building quality and performance over time. Sound, robust evidence to demonstrate this has been established for Greater Essex, and provides clear justification for the policy approach taken in PPL10a.
431	4458	Welbeck Strategic Land [431]	The matters raised are for Building Regulations or national policy.	Object	The standards do not duplicate Building Regs / other national standards. Instead they have been developed to provide an appropriate, justifiable and deliverable route to ensuring that new buildings are designed to achieve the necessary standards that meet climate requirements. Independent review of the national standards / Building Regs has shown that these do not provide the necessary or sufficient means to meet climate commitments and ensure that new buildings deliver the required degree of energy efficiency / other elements of building quality and performance over time. Sound, robust evidence to demonstrate this has been established for Greater Essex, and provides clear justification for the policy approach taken in PPL10a. The Building Regulations (Part L 2026) have recently been updated with the Future Homes Standard ('FHS') which has made some improvements mainly in relation to rooftop Solar PV on new homes, but it has not progressed as much as it could have done or that is necessary in terms of energy efficiency and building fabric standards. Throughout the development of the Essex evidence base and the policy approach set out in PPL10a, the proposed FHS has been considered and factored in as necessary. The FHS is considered inadequate as it only covers a proportion (approximately half) of total building related energy use ('regulated uses') and hence carbon emissions. Also, it does not use a verifiable and measurable energy metric, it does not align with statutory climate targets or energy efficiency and generation objectives, and it does not deliver the best quality homes or deliver the associated benefits for residents that homes built to Policy PPL10a would achieve (e.g. healthy, resilient, energy efficient homes with low running costs). This position is also backed by a body of evidence developed by leading industry experts at a national level e.g. the Climate Emergency Design Guide by LETI. Planning policy is therefore necessary to address the shortcomings that still exist with the Building Regulations 2026 Part L (which includes the FHS) and to ensure new development mitigates and adapts to climate change in line with statutory obligations. Building Regulations set minimum standards that must be achieved for energy performance in new homes and buildings – but these are a 'floor' and not a 'ceiling'. Local authorities have strong legal powers in primary legislation to set higher energy performance standards than Building Regulations in local planning policy where evidenced and justified and this has been accepted by Planning Inspectors on many occasions, including for 2 development plans in Essex. Therefore, to conclude, Policy PPL10a of the Tendring Local Plan is legally justified, fully evidenced and underpinned by a robust and sound technical evidence base, which includes cost analysis and assessment of potential impact on viability, and is

					necessary to deliver statutory obligations to ensure development mitigates and adapts to climate change.
134	13696	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The targets set in the policy are unrealistic and would add substantial cost to projects to make them unviable. The requirement for PV to only be provided in rooftop locations is overly restrictive. The requirement for post-construction energy use monitoring data is impossible to comply with.	Object	For developers that are striving to improve standards and are committed to meeting climate targets and delivering healthy, more energy efficient and climate resilient homes then the policy standards are not burdensome as they are part and parcel of good design practice. Developers should be understanding the energy performance of buildings, designing accordingly and striving to continuously improve the energy efficiency of them. The policy approach aligns with industry best practice and delivers homes and buildings by simply setting energy limits for space heating and a buildings total energy use expressed in kWh per m2 and by requiring renewable energy generation to match demand. The limits are easily predictable throughout the design development stages and verifiable as-built. The metrics used in the policy match those recommended by the UK Climate Change Committee and those incorporated into the industry backed UK Net Zero Carbon Buildings Standard . Indeed, in the Inspector's report for the Uttlesford Local Plan 2021-2041 Examination, the Inspector notes at paragraph 133 that "the use of the EUI metric is becoming more common nationally". The industry has already moved toward consistent energy-based metrics. The policy targets are realistic and not overly prescriptive. The policy does not duplicate or conflict with Building Regulations (which don't use energy metrics), on the contrary it works well by sitting alongside Building Regulations.
1439	13895	Catesby Estates [1439]	Catesby broadly support Draft Strategic Policies PPL10a and PPL10b, which seek to ensure that new development delivers net zero operational and embodied carbon, and integrates circular economy principles, in line with national and local climate change objectives. The Site will seek to achieve a net zero operational carbon rating through a combination of on-site renewable energy technology, building orientation, material choices, and housing design, while also seeking to minimise embodied carbon and incorporate circular economy principles through sustainable material selection, and waste reduction. However, Catesby consider that both policies are overly prescriptive at the plan-making stage, particularly in relation to detailed technical requirements such as Energy Use Intensity limits, precise renewable energy generation calculations, on-site monitoring, and specific embodied carbon thresholds. These detailed design requirements are more appropriately addressed through future reserved matters applications or	Comment	For developers that are striving to improve standards and are committed to meeting climate targets and delivering healthy, more energy efficient and climate resilient homes then the policy standards are not burdensome as they are part and parcel of good design practice. Developers should be understanding the energy performance of buildings, designing accordingly and striving to continuously improve the energy efficiency of them. The policy approach aligns with industry best practice and delivers homes and buildings by simply setting energy limits for space heating and a buildings total energy use expressed in kWh per m^2 and by requiring renewable energy generation to match demand. The limits are easily predictable throughout the design development stages and verifiable as-built. The metrics used in the policy match those recommended by the UK Climate Change Committee and those incorporated into the industry backed UK Net Zero Carbon Buildings Standard[3]. Indeed, in the Inspector's report[4] for the Uttlesford Local Plan 2021-2041 Examination, the Inspector notes at paragraph 133 that *"the use of the EUI metric is becoming more common nationally"*. The industry has already moved toward consistent energy-based metrics.

[3] https://www.nzcbuildings.co.uk/the-standard (NZCBS is supported by industry organisations - BBP, BRE, CIBSE, LETI, ISE, RIBA, RICS, UKGBC)
[4] https://www.uttlesford.gov.uk/media/14064/Local-Plan-Inspectors-Report/pdf/Uttlesford_Local_Plan_2021-2041_Examination_Report.pdf?m=1768841792443

			compliance with Building Regulations. Requiring such detail at this stage could unnecessarily constrain the delivery of development, especially where outline planning applications are proposed. Catesby therefore suggest that the policies retain the overarching objectives of net zero operational and embodied carbon, and circular economy principles, but allow sufficient flexibility for developers to determine the most appropriate technical solutions at the application stage. This approach ensures tha sustainability objectives are met while maintaining the deliverability and viability of new development, in accordance with national policy and guidance.		The policy targets are realistic and not overly prescriptive. The policy does not duplicate or conflict with Building Regulations (which don't use energy metrics), on the contrary it works well by sitting alongside Building Regulations. For developers that are striving to improve standards and are committed to meeting climate targets and delivering healthy, more energy efficient and climate resilient homes then the policy standards are not burdensome as they are part and parcel of good design practice. Developers should be understanding the energy performance of buildings, designing accordingly and striving to continuously improve the energy efficiency of them. The policy approach aligns with industry best practice and delivers homes and buildings by simply setting energy limits for space heating and a buildings total energy use expressed in kWh per m2 and by requiring renewable energy generation to match demand. The limits are easily predictable throughout the design development stages and verifiable as-built. The metrics used in the policy match those recommended by the UK Climate Change Committee and those incorporated into the industry backed UK Net Zero Carbon Buildings Standard . Indeed, in the Inspector's report for the Uttlesford Local Plan 2021-2041 Examination, the Inspector notes at paragraph 133 that "the use of the EUI metric is becoming more common nationally". The industry has already moved toward consistent energy-based metrics. The policy targets are realistic and not overly prescriptive. The policy does not duplicate or conflict with Building Regulations (which don't use energy metrics), on the contrary it works well by sitting alongside Building Regulations. The specific limits set in the policy are underpinned by robust energy and carbon evidence developed for Greater Essex, led by Essex County Council in collaboration with the Essex Local Planning Authorities, including Tendring Council, and published on the Essex Design Guide. The robust technical modelling set out in the Energy and Carbon Policy Study (Report 1: Essex Net Zero Policy Study – Technical Evidence Base - Introba, Etude and Currie & Brown, July 2023, updated September 2025) demonstrates that the policy requirements are technically feasible at reasonable cost. The requirements are focused on measurable outcomes and are realistic; they are not overly prescriptive – for example a developer is free to decide how they design and construct a development to meet the requirements. However, design advice / guidance is published for those that wish to use it on the Essex Design Guide. For example, the Essex Building Specification Guidance contains outline packaged solutions that meet the policy requirements. There is a 2-page guide for each housing typology which covers fabric and system options in addition to MVHR (Mechanical Ventilation Heat Recovery) best practice design guidance. The guide also includes high level guidance on design considerations and thermal bridging. Following from the previous point, this advice is provided on an optional basis to assist developers / designers – but is not a set of prescriptive design solutions in nature. The information required with planning applications, as noted in the supporting text of the Tendring Local Plan, is considered proportionate and necessary to reassure the Local Planning Authority that the policy requirements will be met in practice. Considering energy

					efficiency and renewable energy generation at the earliest design stage of a development is crucial to achieving Policy compliance in practice and in the most cost-effective manner. Consequently, an appropriate level of information should be known and therefore should be provided at each planning stage. In addition to the supporting text, some preliminary advice on the provision of information can be found on the Essex Design Guide implementation resource page. This is currently being streamlined and developed further into the form of 'quick start' guides and simple proformas. The information required with planning applications, as noted in the supporting text of the Tendring Local Plan, is considered proportionate and necessary to reassure the Local Planning Authority that the policy requirements will be met in practice. Considering energy efficiency and renewable energy generation at the earliest design stage of a development is crucial to achieving Policy compliance in practice and in the most cost-effective manner. Consequently, an appropriate level of information should be known and therefore should be provided at each planning stage. The policy also includes flexibility within it to assist small/medium developers with achieving policy compliance. For example, the Council recognises that some smaller developers may not regularly use predictive energy modelling software, and so the policy includes the option of following the minimum standards approach - where the fabric and systems specifications can be used to demonstrate compliance instead. Also, for small/medium developments (under 100 dwellings) the Essex Energy Tool (SAP conversion) – available on the implementation page - can be used to demonstrate policy compliance by using SAP outputs. This type of tool has been successfully used, for example, in Cornwall to aid policy implementation and again provides simplicity and flexibility to assist developers demonstrate policy compliance.
119	14065	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	HBF disagrees to local plan policies that impose carbon and energy efficiency standards beyond Building Regulations. The emerging NPPF, the Planning and Energy Act 2008 and the Written Ministerial Statement emphasise national consistency and caution against locally-set standards that exceed regulations without robust justification. Without any consideration of delivery then the Council's decision to go beyond what is required by building regulations is clearly unjustified. If the Councils have the evidence to show that the policy is deliverable, they will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. The most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building. This will need to be reflected in design policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for example, not being designed in the character of the local area.	Comment	The standards do not duplicate Building Regs / other national standards. Instead they have been developed to provide an appropriate, justifiable and deliverable route to ensuring that new buildings are designed to achieve the necessary standards that meet climate requirements. Independent review of the national standards / Building Regs has shown that these do not provide the necessary or sufficient means to meet climate commitments and ensure that new buildings deliver the required degree of energy efficiency / other elements of building quality and performance over time. Sound, robust evidence to demonstrate this has been established for Greater Essex, and provides clear justification for the policy approach taken in PPL10a. The Evidence includes: - The Essex Open Legal Advice – Part A, 6th May 2025 (plus Addendum October 2025) examines climate science, legislation, national policy (including the Written Ministerial Statement) and case law. The Advice concludes that Local Authorities are legally justified with strong statutory powers, to set policies (such as PPL10a, that go beyond national policy and guidance including Building Regulations), as long as these are evidenced and justified. - the Energy and Carbon Policy Study (Report 1: Essex Net Zero Policy Study – Technical Evidence Base - Introba, Etude and Currie & Brown, July 2023, updated September 2025 and associated documents published on the Essex

					Design Guide. The Study demonstrates the technical feasibility of the Policy and includes cost analysis. The Building Regulations (Part L 2026) have recently been updated with the Future Homes Standard ('FHS') which has made some improvements mainly in relation to rooftop Solar PV on new homes, but it has not progressed as much as it could have done or that is necessary in terms of energy efficiency and building fabric standards. Throughout the development of the Essex evidence base and the policy approach set out in PPL10a, the proposed FHS has been considered and factored in as necessary. The FHS is considered inadequate as it only covers a proportion (approximately half) of total building related energy use ('regulated uses') and hence carbon emissions. Also, it does not use a verifiable and measurable energy metric, it does not align with statutory climate targets or energy efficiency and generation objectives, and it does not deliver the best quality homes or deliver the associated benefits for residents that homes built to Policy PPL10a would achieve (e.g. healthy, resilient, energy efficient homes with low running costs). This position is also backed by a body of evidence developed by leading industry experts at a national level e.g. the Climate Emergency Design Guide by LETI. Planning policy is therefore necessary to address the shortcomings that still exist with the Building Regulations 2026 Part L (which includes the FHS) and to ensure new development mitigates and adapts to climate change in line with statutory obligations. Building Regulations set minimum standards that must be achieved for energy performance in new homes and buildings – but these are a 'floor' and not a 'ceiling'. Local authorities have strong legal powers in primary legislation to set higher energy performance standards than Building Regulations in local planning policy where evidenced and justified and this has been accepted by Planning Inspectors on many occasions, including for 2 development plans in Essex. Therefore, to conclude, Policy PPL10a of the Tendring Local Plan is legally justified, fully evidenced and underpinned by a robust and sound technical evidence base, which includes cost analysis and assessment of potential impact on viability, and is necessary to deliver statutory obligations to ensure development mitigates and adapts to climate change.
1508	14281	Gladman Developments Ltd (Matthew Jones, Senior Policy & Promotions Planner) [1508]	We disagree with the need for this policy. Whilst we acknowledge the importance of new dwellings being environmentally sustainable for future generations, such requirements will be made under national policy, thus making a development management policy on this aspect unnecessary. This policy should therefore be removed and left for the national building regulations to accommodate. However, should this policy remain, we would request that instead of all dwellings, that a percentage of dwellings per site b built out to the standards requested. This would result in net-zero carbon dwellings still being built out, but without the detriment of unaffordability for those seeking to buy, as	Comment	The standards do not duplicate Building Regs / other national standards. Instead they have been developed to provide an appropriate, justifiable and deliverable route to ensuring that new buildings are designed to achieve the necessary standards that meet climate requirements. Independent review of the national standards / Building Regs has shown that these do not provide the necessary or sufficient means to meet climate commitments and ensure that new buildings deliver the required degree of energy efficiency / other elements of building quality and performance over time. Sound, robust evidence to demonstrate this has been established for Greater Essex, and provides clear justification for the policy approach taken in PPL10a.

			ultimately the additional costs incurred in making dwellings net-zero will be reflected in the house prices and therefore the fall upon purchaser.		The Evidence includes: - The Essex Open Legal Advice – Part A, 6th May 2025 (plus Addendum October 2025) examines climate science, legislation, national policy (including the Written Ministerial Statement) and case law. The Advice concludes that Local Authorities are legally justified with strong statutory powers, to set policies (such as PPL10a, that go beyond national policy and guidance including Building Regulations), as long as these are evidenced and justified. - the Energy and Carbon Policy Study (Report 1: Essex Net Zero Policy Study – Technical Evidence Base - Introba, Etude and Currie & Brown, July 2023, updated September 2025 and associated documents published on the Essex Design Guide. The Study demonstrates the technical feasibility of the Policy and includes cost analysis. Similar policies to PPL10a, which are based on the same evidence base have already been found sound by the Planning Inspectorate in Essex and subsequently adopted e.g. Tendring Colchester Borders Garden Community DPD, and Uttlesford Local Plan. Also, similar policies have been adopted in other areas of England, including for example, Winchester, Salt Cross, Cornwall, BaNES, Central Lincs, Greater Manchester. The Essex evidence, together with the TDC Viability Assessment, provide the necessary evidence and justification to support Policy PPL10a. The Building Regulations (Part L 2026) have recently been updated with the Future Homes Standard ('FHS') which has made some improvements mainly in relation to rooftop Solar PV on new homes, but it has not progressed as much as it could have done or that is necessary in terms of energy efficiency and building fabric standards. Throughout the development of the Essex evidence base and the policy approach set out in PPL10a, the proposed FHS has been considered and factored in as necessary. The FHS is considered inadequate as it only covers a proportion (approximately half) of total building related energy use ('regulated uses') and hence carbon emissions. Also, it does not use a verifiable and measurable energy metric, it does not align with statutory climate targets or energy efficiency and generation objectives, and it does not deliver the best quality homes or deliver the associated benefits for residents that homes built to Policy PPL10a would achieve (e.g. healthy, resilient, energy efficient homes with low running costs). This position is also backed by a body of evidence developed by leading industry experts at a national level e.g. the Climate Emergency Design Guide by LETI. Planning policy is therefore necessary to address the shortcomings that still exist with the Building Regulations 2026 Part L (which includes the FHS) and to ensure new development mitigates and adapts to climate change in line with statutory obligations. Building Regulations set minimum standards that must be achieved for energy performance in new homes and buildings – but these are a 'floor' and not a 'ceiling'. Local authorities have strong legal powers in primary legislation to set higher energy performance standards than Building Regulations in local planning policy where evidenced and justified and this has been accepted by Planning Inspectors on many occasions, including for 2 development plans in Essex.

					Therefore, to conclude, Policy PPL10a of the Tendring Local Plan is legally justified, fully evidenced and underpinned by a robust and sound technical evidence base, which includes cost analysis and assessment of potential impact on viability, and is necessary to deliver statutory obligations to ensure development mitigates and adapts to climate change.
1692	14352	Lewis & Scott Homes [1692]	We OBJECT to this policy in its entirety. The policy goes beyond national policy requirements and fails to adequately assess the impact of the measures identified on the viability of smaller sites. It is generally accepted that smaller sites are more expensive to deliver and have lower contingencies to absorb additional costs. At an average level the LPVA in the evidence base estimates that the achieving Zero Cabon would add 8% to the build cost (para 8.71). This represents a significant additional cost for smaller sites that has not adequately been considered in the plan-preparation. Furthermore, there is no discussion in the LPVA regarding the cost implications of meeting the other requirements of this policy (requirements 1 – 5). The Local Plan relies heavily on larger strategic sites to deliver its housing need. It is well-known and understood that these types of sites take a while to be developed, meaning that the plan will be reliant on delivery from smaller sites. This is also true when wider geopolitical matters impact the economy and the funding for larger strategic sites. It is imperative that the wider policies of the plan do not inadvertently hinder the supply of housing from smaller sites by imposing expensive requirements that can only be afforded by the larger strategic sites. To overcome our objection, we would like to see the policy deleted or the addition of text that excludes sites of less than 50 units from the requirements identified. We consider that the Council is in danger of inhibiting development with the approach that it us taking, which will ultimately undermine the potential of the plan to deliver Objective 1.	Object	The standards do not duplicate Building Regs / other national standards. Instead they have been developed to provide an appropriate, justifiable and deliverable route to ensuring that new buildings are designed to achieve the necessary standards that meet climate requirements. Independent review of the national standards / Building Regs has shown that these do not provide the necessary or sufficient means to meet climate commitments and ensure that new buildings deliver the required degree of energy efficiency / other elements of building quality and performance over time. Sound, robust evidence to demonstrate this has been established for Greater Essex, and provides clear justification for the policy approach taken in PPL10a. The Evidence includes: - The Essex Open Legal Advice – Part A, 6th May 2025 (plus Addendum October 2025) examines climate science, legislation, national policy (including the Written Ministerial Statement) and case law. The Advice concludes that Local Authorities are legally justified with strong statutory powers, to set policies (such as PPL10a, that go beyond national policy and guidance including Building Regulations), as long as these are evidenced and justified. - the Energy and Carbon Policy Study (Report 1: Essex Net Zero Policy Study – Technical Evidence Base - Introba, Etude and Currie & Brown, July 2023, updated September 2025 and associated documents published on the Essex Design Guide. The Study demonstrates the technical feasibility of the Policy and includes cost analysis. Similar policies to PPL10a, which are based on the same evidence base have already been found sound by the Planning Inspectorate in Essex and subsequently adopted e.g. Tendring Colchester Borders Garden Community DPD, and Uttlesford Local Plan. Also, similar policies have been adopted in other areas of England, including for example, Winchester, Salt Cross, Cornwall, BaNES, Central Lincs, Greater Manchester. The Essex evidence, together with the TDC Viability Assessment, provide the necessary evidence and justification to support Policy PPL10a. The Building Regulations (Part L 2026) have recently been updated with the Future Homes Standard ('FHS') which has made some improvements mainly in relation to rooftop Solar PV on new homes, but it has not progressed as much as it could have done or that is necessary in terms of energy efficiency and building fabric standards. Throughout the development of the Essex evidence base and the policy approach set out in PPL10a, the proposed FHS has been considered and factored in as necessary.

					The FHS is considered inadequate as it only covers a proportion (approximately half) of total building related energy use ('regulated uses') and hence carbon emissions. Also, it does not use a verifiable and measurable energy metric, it does not align with statutory climate targets or energy efficiency and generation objectives, and it does not deliver the best quality homes or deliver the associated benefits for residents that homes built to Policy PPL10a would achieve (e.g. healthy, resilient, energy efficient homes with low running costs). This position is also backed by a body of evidence developed by leading industry experts at a national level e.g. the Climate Emergency Design Guide by LETI. Planning policy is therefore necessary to address the shortcomings that still exist with the Building Regulations 2026 Part L (which includes the FHS) and to ensure new development mitigates and adapts to climate change in line with statutory obligations. Building Regulations set minimum standards that must be achieved for energy performance in new homes and buildings – but these are a 'floor' and not a 'ceiling'. Local authorities have strong legal powers in primary legislation to set higher energy performance standards than Building Regulations in local planning policy where evidenced and justified and this has been accepted by Planning Inspectors on many occasions, including for 2 development plans in Essex. Therefore, to conclude, Policy PPL10a of the Tendring Local Plan is legally justified, fully evidenced and underpinned by a robust and sound technical evidence base, which includes cost analysis and assessment of potential impact on viability, and is necessary to deliver statutory obligations to ensure development mitigates and adapts to climate change.
1722	14403	Stanfords (Mollie Daniels) [1722]	Policy PPL10a aims to reduce energy use and carbon emissions but imposes highly technical, cumulative requirements that are disproportionate and impractical at the planning stage. It demands detailed modelling, design specifications, and performance data typically only available during Building Regulations and construction phases, creating duplication and inefficiency. Requirements such as on-site energy balancing and five-year post-occupation monitoring go beyond normal planning scope and are difficult o enforce. Additionally, no appropriate statutory consultee exists to assess these technical elements, leaving uncertainty in decision-making. Overall, the policy should be simplified to align with planning's strategic role and avoid undue burdens.	Comment	For developers that are striving to improve standards and are committed to meeting climate targets and delivering healthy, more energy efficient and climate resilient homes, the policy standards are not burdensome as they are part and parcel of good design practice. Developers should be understanding the energy performance of buildings, designing accordingly and striving to continuously improve the energy efficiency of them. The policy approach aligns with industry best practice and delivers homes and buildings by simply setting energy limits for space heating and a buildings total energy use expressed in kWh per m^2 and by requiring renewable energy generation to match demand. The limits are easily predictable throughout the design development stages and verifiable as-built. The metrics used in the policy match those recommended by the UK Climate Change Committee and those incorporated into the industry backed UK Net Zero Carbon Buildings Standard[5]. Indeed, in the Inspector's report[6] for the Uttlesford Local Plan 2021-2041 Examination, the Inspector notes at paragraph 133 that *"the use of the EUI metric is becoming more common nationally"*. The industry has already moved toward consistent energy-based metrics.

[5] https://www.nzcbuildings.co.uk/the-standard (NZCBS is supported by industry organisations - BBP, BRE, CIBSE, LETI, ISE, RIBA, RICS, UKGBC)
[6] https://www.uttlesford.gov.uk/media/14064/Local-Plan-Inspectors-Report/pdf/Uttlesford_Local_Plan_2021-2041_Examination_Report.pdf?m=1768841792443

					The policy targets are realistic and not overly prescriptive. The policy does not duplicate or conflict with Building Regulations (which don't use energy metrics), on the contrary it works well by sitting alongside Building Regulations. The specific limits set in the policy are underpinned by robust energy and carbon evidence developed for Greater Essex, led by Essex County Council in collaboration with the Essex Local Planning Authorities, including Tendring Council, and published on the Essex Design Guide. The robust technical modelling set out in the Energy and Carbon Policy Study (Report 1: Essex Net Zero Policy Study – Technical Evidence Base - Introba, Etude and Currie & Brown, July 2023, updated September 2025) demonstrates that the policy requirements are technically feasible at reasonable cost. The requirements are focused on measurable outcomes and are realistic; they are not overly prescriptive – for example a developer is free to decide how they design and construct a development to meet the requirements. However, design advice / guidance is published for those that wish to use it on the Essex Design Guide. For example, the Essex Building Specification Guidance contains outline packaged solutions that meet the policy requirements. There is a 2-page guide for each housing typology which covers fabric and system options in addition to MVHR (Mechanical Ventilation Heat Recovery) best practice design guidance. The guide also includes high level guidance on design considerations and thermal bridging. Following from the previous point, this advice is provided on an optional basis to assist developers / designers – but is not a set of prescriptive design solutions in nature. The information required with planning applications, as noted in the supporting text of the Tendring Local Plan, is considered proportionate and necessary to reassure the Local Planning Authority that the policy requirements will be met in practice. Considering energy efficiency and renewable energy generation at the earliest design stage of a development is crucial to achieving Policy compliance in practice and in the most cost-effective manner. Consequently, an appropriate level of information should be known and therefore should be provided at each planning stage. In addition to the supporting text, some preliminary advice on the provision of information can be found on the Essex Design Guide implementation resource page. This is currently being streamlined and developed further into the form of 'quick start' guides and simple proformas. The policy also includes flexibility within it to assist small/medium developers with achieving policy compliance. For example, the Council recognises that some smaller developers may not regularly use predictive energy modelling software, and so the policy includes the option of following the *minimum standards approach - w*here the fabric and systems specifications can be used to demonstrate compliance instead. Also, for small/medium developments (under 100 dwellings) the Essex Energy Tool (SAP conversion) – available on the implementation page - can be used to demonstrate policy compliance by using SAP outputs. This type of tool has been successfully used, for example, in Cornwall to aid policy implementation and again provides simplicity and flexibility to assist developers demonstrate policy compliance.
Community Representatives					

953	3518	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1550	13972	PACE (John Hall) [1550]	Tendring Council has passed a Motion that it will not give planning permission for new housing developments where the developer is using Restrictive Covenants in House Sale Contracts to prevent the new house owners from installing sustainable features such as Roof Top Solar Panels. This should therefore be included in both these policies.	Comment	Whilst these comments are noted, the Council would not be able to refuse applications based on restrictive covenants, as they are not a material planning consideration.
Members of the Public					
1352	4070	Mrs Paula Bland [1352]	All new buildings must be built with high quality insulation, solar panels, air source/ground source heat pumps and facilities to harvest rain water. They must be properties of the future.	Comment	This is what these policies aim to achieve.
581	4140	Mrs Sally Webb [581]	A high standard should be set by the Planning authorities.	Support	This is what these policies aim to achieve.

Policy PPL10a: Operational Energy and Carbon (Net Zero) in Homes and Buildings

Summary of Representations

Whilst comments were received questioning the methodology and viability of this policy, the policy is legally justified, fully evidenced and underpinned by a robust and sound technical evidence base, which includes cost analysis and assessment of potential impact on viability, and is necessary to deliver statutory obligations to ensure development mitigates and adapts to climate change.

In response, no changes have been made to Policy PPL10a or the supporting text.

Policy PPL10b: Embodied Carbon and Circular Economy in Homes and Buildings

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
349	4311	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	ESNEFT notes the policy requirement for non-residential developments to achieve set limits for upfront embodied carbon. However, it is requested that further clarification is provided on the application of this policy to proposals comprising non-residential developments other than offices, retail and education, as these are the only non-residential uses identified in the policy.	Comment	Where the limits aren't specified for a certain typology (beyond office, retail and education) then the nearest comparable typology can be used. Within our latest policy position, the UK Net Zero Carbon Buildings Standard typologies are referred to and these figures worked to instead, as it contains a far more extensive selection of typologies. For example, when commenting on data centre applications, the Council has referred to the UKNZCBS due to the absence of an equivalent typology within the Essex policy position. Therefore, where a development does not fall within the identified non-residential typologies, a decision on the approach by the applicant can be taken using either the nearest comparable typology or an UKNZCBS limit. It should be noted that the limits within our policy position statement shouldn't be overly difficult to achieve, as the intention of the policy is to help start the measurement and reporting of embodied carbon.
Businesses, Landowners and Developers					
705	4091	Mr Peter Le Grys [705]	Such matters are better controlled under the Building Regulations. The NPPF is clear that the planning system should not be used to duplicate measures which are better controlled elsewhere.	Object	The Building Regulations 2021 and 2026 update (which includes the Future Homes Standard) do not address embodied carbon emissions from new development. It is for this reason that the planning system, and local planning authorities through their local plans, must ensure new development addresses embodied carbon emissions, in a way that aligns with local and national climate targets, mitigates and adapts to climate change and delivers the best outcomes for people. This is justified through primary legislation, including the Planning and Compulsory Purchase Act 2004, and national policy (including the NPPF) which require local plans to include policies to secure development that mitigates and adapts to climate change. For further explanation of the legal justification refer to the Essex Open Legal Advice – Part A, 6th May 2025 (plus Addendum October 2025). Policy PPL10b is also underpinned by a robust and sound shared technical evidence base that has been established for Greater Essex, including the Essex Embodied Carbon Policy Study (Technical Evidence Base - Levitt Bernstein, Etude, Introba, Hawkins/Brown, Currie & Brown, June 2024, Re-issued September 2025) and associated documents published on the Essex Design Guide. Similar policies to PPL10b, which are based on the same evidence base, have already been found sound by the Planning Inspectorate in Essex and subsequently adopted e.g. Uttlesford Local Plan.
1638	4446	Lichfields (Amy Jones, Planner) [1638]	The requirements are too onerous and unjustified, and step beyond national requirements. Policies PPL10a and 10b should be carefully reviewed and re-drafted to ensure that they are brought in line with national requirements and building regulations. The policies must be robustly tested for practicability, deliverability and feasibility.	Object	The Building Regulations 2021 and 2026 update (which includes the Future Homes Standard) do not address embodied carbon emissions from new development. It is for this reason that the planning system, and local planning authorities through their local plans, must ensure new development addresses embodied carbon emissions, in a way that aligns with local and national climate targets, mitigates and adapts to climate change and delivers the best outcomes for people. This is justified through primary legislation, including the Planning and Compulsory Purchase Act 2004, and national policy (including the NPPF) which require local plans to include policies to secure development that mitigates and adapts to climate change. For further explanation of the legal justification

					refer to the Essex Open Legal Advice – Part A, 6th May 2025 (plus Addendum October 2025). Policy PPL10b is also underpinned by a robust and sound shared technical evidence base that has been established for Greater Essex, including the Essex Embodied Carbon Policy Study (Technical Evidence Base - Levitt Bernstein, Etude, Introba, Hawkins/Brown, Currie & Brown, June 2024, Re-issued September 2025) and associated documents published on the Essex Design Guide. Similar policies to PPL10b, which are based on the same evidence base, have already been found sound by the Planning Inspectorate in Essex and subsequently adopted e.g. Uttlesford Local Plan.
431	4459	Welbeck Strategic Land [431]	For similar reasons set out in the objection to Strategic Policy PPL10a, Strategic Policy PPL10b should be deleted because it is a matter for national policy, guidance and regulations to consider matters related to embedded carbon and the circular economy in homes and buildings. If the policy is retained, objection is made to criterion (1) because of a lack of clarity. What does "to the satisfaction of the local planning authority mean"? Objection is raised to this open ended statement which will inevitably be open to different interpretations. A clearer statement is required in the policy to assess applications against.	Object	The Building Regulations 2021 and 2026 update (which includes the Future Homes Standard) do not address embodied carbon emissions from new development. It is for this reason that the planning system, and local planning authorities through their local plans, must ensure new development addresses embodied carbon emissions, in a way that aligns with local and national climate targets, mitigates and adapts to climate change and delivers the best outcomes for people. This is justified through primary legislation, including the Planning and Compulsory Purchase Act 2004, and national policy (including the NPPF) which require local plans to include policies to secure development that mitigates and adapts to climate change. For further explanation of the legal justification refer to the Essex Open Legal Advice – Part A, 6th May 2025 (plus Addendum October 2025). Policy PPL10b is also underpinned by a robust and sound shared technical evidence base that has been established for Greater Essex, including the Essex Embodied Carbon Policy Study (Technical Evidence Base - Levitt Bernstein, Etude, Introba, Hawkins/Brown, Currie & Brown, June 2024, Re-issued September 2025) and associated documents published on the Essex Design Guide. Similar policies to PPL10b, which are based on the same evidence base, have already been found sound by the Planning Inspectorate in Essex and subsequently adopted e.g. Uttlesford Local Plan.
1439	13896	Catesby Estates [1439]	Catesby broadly support Draft Strategic Policies PPL10a and PPL10b, which seek to ensure that new development delivers net zero operational and embodied carbon, and integrates circular economy principles, in line with national and local climate change objectives. The Site will seek to achieve a net zero operational carbon rating through a combination of on-site renewable energy technology, building orientation, material choices, and housing design, while also seeking to minimise embodied carbon and incorporate circular economy principles through sustainable material selection, and waste reduction. However, Catesby consider that both policies are overly prescriptive at the plan-making stage, particularly in relation to detailed technical requirements such as Energy Use Intensity limits, precise renewable energy	Comment	For developers that are striving to improve standards and are committed to meeting climate targets and delivering healthy, more energy efficient and climate resilient homes then the policy standards are not burdensome as they are part and parcel of good design practice. Developers should be understanding the energy performance of buildings, designing accordingly and striving to continuously improve the energy efficiency of them. The policy approach aligns with industry best practice and delivers homes and buildings by simply setting energy limits for space heating and a buildings total energy use expressed in kWh per m^2 and by requiring renewable energy generation to match demand. The limits are easily predictable throughout the design development stages and verifiable as-built. The metrics used in the policy match those recommended by the UK Climate Change Committee and those incorporated into the industry backed UK Net Zero Carbon Buildings Standard[7]. Indeed, in the Inspector's report[8] for the Uttlesford Local Plan 2021-2041 Examination, the Inspector notes at paragraph 133 that *"the use of the EUI metric is becoming more common nationally"*. The industry has already moved toward consistent energy-based metrics.

[7] https://www.nzcbuildings.co.uk/the-standard (NZCBS is supported by industry organisations - BBP, BRE, CIBSE, LETI, ISE, RIBA, RICS, UKGBC)
[8] https://www.uttlesford.gov.uk/media/14064/Local-Plan-Inspectors-Report/pdf/Uttlesford_Local_Plan_2021-2041_Examination_Report.pdf?m=1768841792443

			generation calculations, on-site monitoring, and specific embodied carbon thresholds. These detailed design requirements are more appropriately addressed through future reserved matters applications or compliance with Building Regulations. Requiring such detail at this stage could unnecessarily constrain the delivery of development, especially where outline planning applications are proposed. Catesby therefore suggest that the policies retain the overarching objectives of net zero operational and embodied carbon, and circular economy principles, but allow sufficient flexibility for developers to determine the most appropriate technical solutions at the application stage. This approach ensures th t sustainability objectives are met while maintaining the deliverability and viability of new development, in accordance with national policy and guidance.		The policy targets are realistic and not overly prescriptive. The policy does not duplicate or conflict with Building Regulations (which don't use energy metrics), on the contrary it works well by sitting alongside Building Regulations. The specific limits set in the policy are underpinned by robust energy and carbon evidence developed for Greater Essex, led by Essex County Council in collaboration with the Essex Local Planning Authorities, including Tendring Council, and published on the Essex Design Guide. The robust technical modelling set out in the Energy and Carbon Policy Study (Report 1: Essex Net Zero Policy Study – Technical Evidence Base - Introba, Etude and Currie & Brown, July 2023, updated September 2025) demonstrates that the policy requirements are technically feasible at reasonable cost. The requirements are focused on measurable outcomes and are realistic; they are not overly prescriptive – for example a developer is free to decide how they design and construct a development to meet the requirements. However, design advice / guidance is published for those that wish to use it on the Essex Design Guide. For example, the Essex Building Specification Guidance contains outline packaged solutions that meet the policy requirements. There is a 2-page guide for each housing typology which covers fabric and system options in addition to MVHR (Mechanical Ventilation Heat Recovery) best practice design guidance. The guide also includes high level guidance on design considerations and thermal bridging. Following from the previous point, this advice is provided on an optional basis to assist developers / designers – but is not a set of prescriptive design solutions in nature. The information required with planning applications, as noted in the supporting text of the Tendring Local Plan, is considered proportionate and necessary to reassure the Local Planning Authority that the policy requirements will be met in practice. Considering energy efficiency and renewable energy generation at the earliest design stage of a development is crucial to achieving Policy compliance in practice and in the most cost-effective manner. Consequently, an appropriate level of information should be known and therefore should be provided at each planning stage. In addition to the supporting text, some preliminary advice on the provision of information can be found on the Essex Design Guide implementation resource page. This is currently being streamlined and developed further into the form of 'quick start' guides and simple proformas. The policy also includes flexibility within it to assist small/medium developers with achieving policy compliance. For example, the Council recognises that some smaller developers may not regularly use predictive energy modelling software, and so the policy includes the option of following the *minimum standards approach - w*here the fabric and systems specifications can be used to demonstrate compliance instead. Also, for small/medium developments (under 100 dwellings) the Essex Energy Tool (SAP conversion) – available on the implementation page - can be used to demonstrate policy compliance by using SAP outputs. This type of tool has been successfully used, for example, in Cornwall to aid policy implementation and again provides simplicity and flexibility to assist developers demonstrate policy compliance.
119	14066	Home Builders Federation	This policy requires an assessment be undertaken as to the total embodied carbon emitted as part of the A1 to A5 stages set out in the RICS assessment methodology and	Comment	The Essex Embodied Carbon Policy Study developed for Greater Essex demonstrates that the policy PPL10b is technically feasible to deliver at no additional cost uplift. The technical evidence report includes the cost analysis and technical modelling. It shows

		(Mr Mark Behrendt, Planning Manager) [119]	for the developer to demonstrate that each home on major development sites will deliver no more than 500 kgCO2e/m2. HBF recognise that there is a need to reduce embodied carbon but have significant concerns that seeking to introduce local standards when understanding of this across the industry is still in its infancy means that the policy will delay the delivery of new homes. Firstly, it must be noted that there is nothing in NPPF to support policies that require developers to undertake whole life carbon assessments and meet specific technical standards. There has been suggestion that a standard should be set through building regulations. However, this has not happened and is an indication that council's should not be setting local standards. Secondly HBF are concerned that the Council is seeking to implement standards is that not all products will have Environmental Product Declaration (EPD) making it difficult for consistent assessments to be undertaken across the developments. This can lead to significant inconsistencies in the outcome of any assessment depending on assumptions that are used within the assessment model. This makes it difficult for the applicant to accurately show whether the standard is being me and for the decision maker to determine an application on the basis of the information provided. It could lead to confusing situations where assessments made for the same development achieve a different outcome in terms of embodied carbon. As such HBF consider he policy to be ineffective. In addition, the policy is unjustified as it would appear than no additional costs have been factored into the cost of meeting this standard. While it is difficult to know how much this will cost as it will depend on the type of materials used by a specific developer and the cost differential of building using lower carbon alternatives to that developer. It will also vary significantly on the site and its topography. The Council will therefore need to include an uplift to building costs within the viability study. Without any uplift to costs to take account of this policy it cannot be considered as being justified.		that the upfront embodied carbon limits set in the policy can be achieved on a typical building of standard construction that complies with PPL10a (operational energy & carbon) at no additional cost uplift. The limits have been selected as a realistic and deliverable first step to assist industry begin to measure and address embodied carbon. There is no evidence or reason for any delay in the delivery of homes. Furthermore, the evidence shows that with a marginal cost uplift e.g. 1.5% for a semi detached home, greater reductions in embodied carbon can be achieved, and the Council would welcome developers doing this. Guidance has also been published on the Essex Design Guide which provides advice on designing to minimise embodied and operational carbon emissions and which is aimed at supporting industry with delivery of homes and can also deliver capital cost savings too.
1718	14316	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning wish to comment on part 1 where it is stated that 'Re-using, renovating or retrofitting existing buildings and/or structures should be prioritised. Any demolition must be justified to the satisfaction of the Local Planning Authority'. This does not necessarily square with brownfield site allocations, where the demolition and redevelopment of existing buildings for	Comment	Legislation sets out that planning decisions must be made in accordance with the policies of the Development Plan unless material considerations indicate otherwise. The Development Plan policies must be read as a whole. If there is a tension between 2 policies then it is a matter for the decision maker to weigh up in the 'planning balance' along with all relevant material considerations. It is the role of professional planners through the development management process to use their expertise and judgement to deliver sound decisions or advice to decision-makers.

			alternative uses is explicitly expected. Therefore, we consider this part of the policy should be re-considered.		It is not necessary for policy to cover all possible scenarios. There may be situations on brownfield sites where demolition is justified and in other cases where it is not justified. There is flexibility in the policy to allow for this. No change is therefore considered necessary.
1692	14353	Lewis & Scott Homes [1692]	Paragraph 7.60 of the plan advises that policy PPL10a and PPL 10b are designed to be implemented alongside each other. It follows therefore that our concerns in relation to policy PPL10a are equally valid here. We OBJECT to the requirements set out at criterion 3 of this policy as it will adversely impact on the viability of smaller schemes (schemes over 10 homes are major development) and will inhibit the ability of these developments to come forward. The requirements are better suited to strategic sites (as defined at para 9.3 of the plan) where the developer is likely to be able to benefit from established purchasing chains and a wider workforce to draw upon in order to meet the requirements. It is unclear from the evidence base where the implication of the requirements has been adequately tested and assessed. The Local Plan relies heavily on larger strategic sites to deliver its housing need. It is well-known and understood that these types of sites take a while to be developed, meaning that the plan will be reliant on delivery from smaller sites. This is also true when wider geopolitical matters impact the economy and the funding for larger strategic sites. It is imperative that the wider policies of the plan do not inadvertently hinder the supply of housing from smaller sites by imposing expensive requirements that can only be afforded by the larger strategic sites. To overcome our concerns we suggest that criterion 3 is either deleted or confined to schemes strategic allocations/windfall sites that meet the definition of a strategic allocation.	Object	Criterion 3 of PPL10b only applies to major residential and non-residential development proposals. It does not apply to minor development proposals. The Essex Embodied Carbon Policy Study developed for Greater Essex demonstrates that the policy PPL10b is technically feasible to deliver at no additional cost uplift. The technical evidence report includes the cost analysis and technical modelling. It shows that the upfront embodied carbon limits set in the policy can be achieved on a typical building of standard construction that complies with PPL10a (operational energy & carbon) at no additional cost uplift. There is therefore no need to incorporate an uplift to building costs within the local plan viability study. The limits have been selected as a realistic and deliverable first step to assist industry begin to measure and address embodied carbon. They are purposely not too onerous but will deliver better building performance in terms of embodied carbon without excluding specific materials or home designs (e.g. detached homes). Also, evidence shows material efficiency measures generated to meet these policies can drive capital cost reductions, when limits are set at the right levels too (see page 29 of the Essex Embodied Carbon Study).
Community Representatives					
953	3519	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1550	13973	PACE (John Hall) [1550]	Tendring Council has passed a Motion that it will not give planning permission for new housing developments where the developer is using Restrictive Covenants in House Sale Contracts to prevent the new house owners from installing sustainable features such as Roof Top	Comment	Whilst these comments are noted, the Council would not be able to refuse applications based on restrictive covenants, as they are not a material planning consideration.

			Solar Panels. This should therefore be included in both these policies.		
Members of the Public					

Policy PPL10b: Embodied Carbon and Circular Economy in Homes and Buildings

Summary of Representations
Whilst comments were received questioning the methodology and viability of this policy, the policy is legally justified, fully evidenced and underpinned by a robust and sound technical evidence base, which includes cost analysis and assessment of potential impact on viability, and is necessary to deliver statutory obligations to ensure development mitigates and adapts to climate change.

In response, no changes have been made to Policy PPL10b or its supporting text.

Policy PPL10c: Renewable Energy Installations

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Proposed change to Local Plan	Council response
Technical Stakeholders					
808	6555	Ministry of Defence (Chris Waldron, DIO Assistant Safeguarding Manager) [808]	The MOD notes the intentions of New Strategic Policy PPL10c Renewable Energy Installations and the requirement for aviation activities adverse impacts to be addressed. However, the MOD considers it necessary that this is expanded to include specific reference to those technical assets which facilitate aviation safety such as navigational aids. In addition, the MOD also considers it necessary that specific mention of the need to account for defence radar coverage in relation to wind energy development is specifically identified. Some renewable energy generation infrastructure, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon the effective operation of safeguarded defence technical installations. Solar farm developments located in proximity to safeguarded navigational aids, or other types of technical sites, can impact upon their effective operation by introducing substantial areas of metallic types of surfaces that may affect transmissions. Where turbines are erected in line of sight to defence radars, the rotating motion of their blades can degrade and cause interference to their effective operation. The MOD recommend that any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights. As noted in the preferred options renewable energy section of the documentation, the MOD needs to be consulted on all proposals to develop wind turbines that are 11m or greater in height to blade tip or, that have a rotor diameter of 2m or greater. This is necessary to safeguard defence radar coverage across the UK used to manage MOD ranges, provide air traffic control and maintain UK air defence. Where development falls outside designated	Comment	Within site specific policies in Chapter 9 this will be addressed.

			safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to: Tall or narrow profile structures such as masts or flue stacks with a height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.		
6	13465	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water supports this policy which should assist in facilitating the delivery of renewable energy schemes. Anglian Water is always-looking for ways to reduce our carbon emissions, with renewable energy as a key step towards-our ambitious goal of becoming a carbon neutral business. Renewable energy-schemes also help to provide energy security and resilience for our critical infrastructure. We use land at or close to our operational sites to create solar arrays and generate renewable-energy. It is an efficient way of maximising the space we have. We are also trialling an energy-storage solution that will allow us to store excess solar energy generated during the day in batteries and use it at other times, helping us to reduce our reliance on energy from?the grid.	Support	These comments are noted.
823	13546	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The encouragement of bio solar is welcomed, particularly for larger commercial buildings and solar farms where they can deliver dual benefits for renewable energy generation and biodiversity enhancement. Solar farms in particular can also offer significant opportunities for ecological enhancements of which can contribute meaningfully to the priorities and opportunity areas identified within the Essex Local Nature Recovery Strategy. Highlighting this connection will further support the policy to deliver biodiversity outcomes from schemes and would help ensure that solar energy infrastructure not only minimises environmental harm but actively supports landscape scale nature recovery, habitat connectivity and multifunctional GI, solar, at scale nature recovery, habitat connectivity and multifunctional	Comment	Whilst these comments are noted the plan should be read as a whole where there are specific policies around biodiversity and the protection of the natural environment which should be read alongside this policy.
148	14480	Environment Agency (Environment Agency) [148]	Policy PPL10c mentions that battery storage will be supported but does not reference the potential risks from these developments. As per our earlier response at Issues & Options stage (referenced AE/2025/130376/01-L01 and dated 9 April 2025), in order for the Local Plan to be effective we recommend the following comments. There is potential for highly polluting chemicals in	Comment	This falls under different legislative requirements outside of the planning system and therefore considered the licence process will take place once permission is granted.

			batteries to enter groundwater or surface water through firewater or rainfall, if abnormal and emergency situations occur such as a fire. Applicants should assess risks to groundwater and ensure mitigation is in place to contain any polluted water. Applicants should consider whether BESS should be located away from vulnerable receptors.		
Businesses, Landowners and Developers					
Community Representatives					
953	3520	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1550	13974	PACE (John Hall) [1550]	Tendring Council has passed a Motion that it will not give planning permission for new housing developments where the developer is using Restrictive Covenants in House Sale Contracts to prevent the new house owners from installing sustainable features such as Roof Top Solar Panels. This should therefore be included in both these policies.	Comment	Whilst these comments are noted, the Council would not be able to refuse applications based on restrictive covenants, as they are not a material planning consideration.
Members of the Public					
581	4141	Mrs Sally Webb [581]	Difficult to implement but sensible	Support	Noted.

Policy PPL10c: Renewable Energy Installations

Summary of Representations
Comments have been received from the MOD requiring specific amendments around the size of structures, this will be considered elsewhere in the Local Plan.
Other comments received raised Health and Safety concerns, Biodiversity implications and licensing issues.

In response, these comments did not raise relevant points, and therefore, no changes proposed to Policy PPL10c.

Policy PPL11: The Avenues Area of Special Character, Frinton-on-Sea

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
953	3521	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4142	Mrs Sally Webb [581]	special area.	Support	Noted.

Policy PPL11: The Avenues Area of Special Character, Frinton-on-Sea

Summary of Representations
No changes proposed in the representations submitted for Policy PPL11.

In response, no changes have been made to Policy PPL11 or its supporting text.

Policy PPL12: The Gardens Area of Special Character, Clacton-on-Sea

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
953	3522	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4143	Mrs Sally Webb [581]	sensible	Support	Noted.

Policy PPL12: The Gardens Area of Special Character, Clacton-on-Sea

Summary of Representations

No changes proposed in the representations submitted for Policy PPL12.

In response, no changes have been made to Policy PPL12 or its supporting text.

Policy PPL12a: Thorpe Station and Maltings

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
276	3976	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	Thorpe Maltings has fallen into a state of disrepair and become an eyesore. Redevelopment of the Maltings, the adjacent derelict King Edward VII public house and surrounding land could provide both residential and retail development opportunities, which include a variety of housing types such as flats, which are unlikely to be part of other housing development sites brought forward in the local area. This would make good use of a brown field site which should be prioritised over greenfield site for development.	Support	This comment of support is noted.
358	13551	Historic England (Andrew Marsh, Historic Environment Planning Adviser) [358]	We welcome the new policy, which seeks to find a solution to bring the Grade II listed Thorpe Maltings, a key site within the Thorpe le Soken Maltings Conservation Area (which is also on Historic England's Heritage at Risk Register), back into a sympathetic use. We look forward to working with the Council to help secure a solution for the site and would be happy to engage in pre application discussions with developers to encourage sympathetic development.	Support	This comment of support is noted.
Businesses, Landowners and Developers					
1702	14362	Peter Hollis & Rosegrade Limited [1702]	The representation welcomes Policy PPL12a and supports the regeneration of Thorpe Maltings, noting existing planning permission for conversion and development has already been granted and remains extant. Efforts have been made to bring the site forward, including pre-application discussions and marketing, but viability challenges remain. The potential for enabling development and scheme revisions is highlighted to support delivery. Engagement with Railtrack is also identified as important to improve access and parking. It is suggested that a collaborative approach, including a Pre-Planning Agreement, would help deliver a viable, comprehensive scheme that restores the site and supports the wider conservation area and local economy.	Support	These comments of support are welcomed.
Community Representatives					
953	3523	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4144	Mrs Sally Webb [581]	This area has needed support for change for so many years. It should be a priority for sympathetic change and use.	Support	Noted.

Policy PPL12a: Thorpe Station and Maltings

Summary of Representations
No changes were proposed within the representations submitted.

In response, no changes have been made to Policy PPL12a or its supporting text.

Policy PPL12b: St Osyth Priory

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
1654	13496	Natural England (Jonathan Burt) [1654]	Natural England appreciates the complexities of bringing about the restoration of St Osyth Priory, a nationally recognised collection of unique and significant collection of heritage assets including historic Listed Buildings and Scheduled Ancient Monuments, with its grounds designated as a Registered Park and Garden set within the wider Conservation Area. We understand the need, following many decades of decline, for the Priory's current owners to take forward a programme of restoration and business activity aimed at reversing the decline of the Priory, opening it up for events and other commercial activities and increasing public access to ensure these unique heritage assets can be looked after and enjoyed for future generations.	Comment	These comments are welcomed.
78	13590	St Osyth Parish Council (Mr Neil Williams, Parish Clerk) [78]	The Parish Council strongly supports the restoration, conservation and use of St Osyth Priory and its wider estate. The Priory is one of the most important historic assets within the District of Tendring and is of national heritage significance. Its preservation is vital not only to St Osyth but to the wider cultural and historical identity of the district. The Parish Council supports: • the continued work of the St Osyth Priory and Parish Trust and the owners of the Priory. • the implementation of the agreed Business Strategy (2019, updated 2023). • constructive partnership working with Tendring District Council and Historic England. • securing external funding streams to reduce the conservation deficit. However, the Parish Council emphasises that restoration must be accompanied by significantly improved public access to: • the Priory precinct; • the buildings for which the St Osyth Priory and Parish Trust is responsible; and • the surrounding historic parkland. Whilst privately owned, St Osyth Priory should not be considered solely to be a private asset. It is a heritage asset of district-wide, if not national importance and restoration should therefore deliver tangible and meaningful public benefit. The Parish Council acknowledges that Enabling Development can, in principle,	Support	Whilst these comments are noted it is felt than enabling development should be located relatively closely to the site it is related to. Having sites further away has the potential to create remote and unsustainable development.

			form part of a strategy to secure heritage restoration, however, the Council has serious concerns in respect of any continued reliance on additional development within the parish. St Osyth already has approximately 520 new residential properties pending or in the pipeline. This represents a very substantial level of growth for a parish of its size. The cumulative impacts of this development include: • pressure on local services; • increased traffic congestion; • strain on utilities infrastructure and drainage and; • significant parking shortages within the village centre. In particular, the long-standing and acute lack of adequate parking provision in the centre of the village remains unresolved. Further residential development that does not directly contribute to addressing this infrastructure deficit will exacerbate existing problems. The Parish Council is firmly of the opinion that as St Osyth Priory is recognised as an important heritage asset within the Tendring District as a whole, the responsibility for supporting its restoration through Enabling Development should not fall disproportionately upon the Parish of St Osyth. If further Enabling Development is deemed necessary to address the conservation deficit, the Parish Council believes such development should be distributed more equitably across the district, rather than concentrated within the immediate parish boundary. The current draft wording of Policy PPL12b, which expects residential Enabling Development to have a “reasonable geographical relationship and connection to St Osyth,” risks reinforcing an over-concentration of development in a parish that has already accepted significant growth. The Parish Council is particularly concerned that: • additional development within St Osyth would not directly resolve the village’s infrastructure shortfalls. • there is no clear mechanism within the draft policy to secure meaningful improvements to village-centre parking. • further housing growth risks undermining the character, setting and amenity of the historic		

			village environment. Without parallel and guaranteed investment in infrastructure, especially the provision of a public car park, additional Enabling Development would conflict with the principles of sustainable development. The Parish Council respectfully requests that the Local Plan: 1. Recognise that St Osyth has already accommodated substantial growth. 2. Clarify that Enabling Development, where justified, may be located elsewhere within the district where appropriate. 3. Require demonstrable, secured public benefit, including improved access to the Priory precinct and parkland, as a prerequisite of any further Enabling Development. 4. Explicitly require infrastructure mitigation, including parking provision within the village centre, where development impacts arise. St Osyth Parish Council supports the restoration and long-term conservation of St Osyth Priory, which: • supports partnership working with Tendring District Council, the Trust and Historic England. • supports improved and meaningful public access to the Priory estate. The Parish Council objects to further Enabling Development being concentrated within St Osyth Parish. The Parish Council consider St Osyth Priory to be a district-wide heritage asset, and that any development required to support its restoration should be distributed fairly across Tendring District rather than placing further strain on a parish that has already accepted significant residential growth. The Parish Council respectfully request that these concerns be given full consideration as the Local Plan progresses.		
Businesses, Landowners and Developers					
1713	13675	City & Country [1713]	Policy PPL12b St Osyth's Priory, supports the work of the St. Osyth and Priory and Parish Trust and the owners of St Osyth Priory to bring about the restoration, re-use and improved public access to St. Osyth Priory and its wider estate. The overarching objective of Policy PPL12b is strongly supported.	Comment	Comments noted and the reference to location of enabling development has been relaxed in the policy wording to allow greater flexibility.

			As it stands, is considered that the proposed wording of Policy PPL12b is not sufficiently justified and is unlikely to be effective. The above requirement for residential enabling development proposals to have 'a reasonable geographical relationship and connection to St. Osyth, the Priory and the community to which it most relates' provides too much scope for a narrow reading of where in the district enabling development might be acceptable. Whilst we acknowledge that enabling development is perhaps more often located within the ground of listed buildings themselves, as suggested by HE guidance as a 'typical example of enabling development', it does not mean to say that enabling development cannot be located elsewhere. It can also mean that harm to the heritage asset itself, or setting, can be avoided. As set out above, it is important to avoid harming heritage assets when bringing forward enabling development. This is a benefit of allowing enabling development on sites within a wider geographical area. Given the Priory's national significance, the geographical relationship and connection of enabling development should not be confined to the immediate area around the Priory. Indeed, this would likely be undesirable, as this would focus a large amount of development around this sensitive heritage asset. Further to the above, given the Priory's national significance and the risk of local over development, it is considered that any residential development in Tendring would have a reasonable geographic relationship and connection to St. Osyth, the Priory and the community to which it most relates. (See full document for proposed wording changes)		
Community Representatives					
953	3524	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design
Members of the public					
581	4145	Mrs Sally Webb [581]	Sensible	Support	Noted

Policy PPL12b: St Osyth Priory

Summary of Representations
City and County requested a change for new enabling development to be located away from St Osyth.

After consideration with Heritage specialists, it is decided this is an acceptable approach and the change has been made to the Policy wording. No further changes have been made to Policy PPL12b or its supporting text.

Policy PPL12c: Protection of the Naze

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
6	13466	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Paragraph 7.88 - Anglian Water notes that the supporting text identifies that our Walton-on-the-Naze WRC is located in the Naze coastal landscape. The WRC is critical infrastructure for the treatment of wastewater for the communities of Walton-on-the-Naze, Frinton-on-Sea, Kirby Cross, Kirby le Soken and Great Holland. Anglian Water will be attending the Naze Management Board set up by the Council to address coastal erosion risk to the Naze coastal landscape. Anglian Water is currently preparing the next Drainage and Water Recycling Management Plan (DWMP) for 2030-2055. Our DWMP will set out how we are planning for the future of drainage and water recycling across our region. While there is still more work to do to understand how we reach our long-term goals, we've started to map out how we will keep our services reliable as our population grows and weather becomes more extreme. This thinking will continue to develop as we work with others, use better data, and build a fuller picture of the challenges ahead, including coastal erosion risk. Anglian Water supports the policy aims to work with partners and landowners to continue to strengthen the current and future protection of the Naze from coastal erosion, given its multifunctional benefits, including as a location for critical utilities infrastructure. The policy or supporting text is not clear whether any future upgrades to the WRC are acceptable in principle – this may include infrastructure to address environmental obligations for example. However, we note that such development proposals, should they require planning consent, would be subject to determination by Essex County Council, as the waste planning authority.	Comment	These comments of support are welcome and any future planning application would be dealt with on a case-by-case basis.
1654	13497	Natural England (Jonathan Burt) [1654]	We support policy aims for partnership working to continue to strengthen future protection of the Naze at Walton from coastal erosion and to promote the Naze for formal recognition as a 'Heritage Coast' in respect of its natural beauty, its flora and fauna and heritage features. Natural England welcomes other aspects of this policy including promoting stronger protection through input into future reviews of the Essex and South Suffolk Shoreline Management Plan, delivery of nature recovery and Biodiversity Net Gain and resisting development proposals that would threaten the protection of the Naze and its unique qualities. We advise that ecological enhancement opportunities within the Essex LNRS should also be explored.	Support	This support is welcomed.
823	13547	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Re the importance of the site for migratory birds, it should also be noted that this area of coast lies on the East Atlantic Flyway for migratory birds, with the East Coast Flyway recently being added to the UK Government's Tentative List for designation as a Natural World Heritage Site. Comment and recommended change The policy supports nature recovery through the Local Nature Reserve and opportunities for Biodiversity Net Gain, and it should include a reference to the Essex Local Nature Recovery Strategy (LNRS). Linking the policy to the LNRS would provide a clear spatial framework, ensuring that future protection, enhancement and management of the Naze are aligned with county-wide priorities for habitat creation, connectivity and biodiversity restoration.	Comment	Comments are noted and reference to the LNRS will be added to the Policy wording.
258	13609	Frinton and Walton Town Council (Miss	We very strongly support this policy due to its importance not just to Walton but to protecting Kirby from flood. It also has key sewage infrastructure on it.	Support	This support is welcomed.

		Tanya Smith, Clerk) [258]			
258	14175	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We very strongly support this policy due to its importance not just to Walton but to protecting Kirby from flood. It also has key sewage infrastructure on it.	Support	Noted.
148	14473	Environment Agency (Environment Agency) [148]	We note the inclusion of this proposed policy and welcome further engagement on the development of plans for management of the Naze to ensure a continued sustainable approach to Coastal Management is adopted and maintained. Given the level of risk associated with erosion at the northern end of the Naze and current trends, there will be a need to consider the issue of the longer term relocation of the key utility infrastructure located there.	Comment	Noted.
Businesses, Landowners and Developers					
Community Representatives					
953	3525	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4146	Mrs Sally Webb [581]	Should be protected.	Support	Noted.

Policy PPL12c: Protection of the Naze

Summary of Representations
Representations for Policy PPL12 showed broad support for the policy. Essex County Council have requested reference to the Essex Local Nature Recovery Strategy (LNRS) – this wording has been added to the Policy.

In response, reference has been added to the Essex Local Natural Recovery Strategy. No further changes have been made to Policy PPL12c or its supporting text.

Policy PPL13: Ardleigh Reservoir Catchment Area

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers, but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
6	13467	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water supports this policy for the protection of Ardleigh Reservoir and its operation. The reservoir is a source of water supply for both Anglian Water and Affinity Water and run by the Ardleigh Reservoir Committee to represent both water companies. Anglian Water has a programme of investments for delivery in AMP8 across Tendring District. This includes a water pipeline transfer from Colchester advanced water reuse scheme to Ardleigh Reservoir which will be partly within Tendring district. We would seek a supportive policy framework to help facilitate the delivery of our infrastructure projects, so they are delivered in a timely manner to enable future growth to proceed.	Support	Whilst this support is noted, any future planning applications will have to be dealt with on their own merit.
Businesses, Landowners and Developers					
Community Representatives					
953	3526	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4147	Mrs Sally Webb [581]	Very important indeed.	Support	Noted.

Policy PPL13: Ardleigh Reservoir Catchment Area

Summary of Representations
Broad support was expressed for Policy PPL13 within representations.

In response, there are no changes to be made to Policy PPL13 or its supporting text.

Policy PPL14: Safeguarding of Civil Technical Site, North East of Little Clacton/South of Thorpe-le-Soken

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
953	3527	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4149	Mrs Sally Webb [581]	sensible	Support	Noted.

Policy PPL14: Safeguarding of Civil Technical Site, North East of Little Clacton/South of Thorpe-le-Soken

Summary of Representations
No changes to Policy PPL14 have been suggested within the representations submitted.

In response, there are no changes to be made to Policy PPL14 or its supporting text.

Policy PPL15: Safeguarding of Hazardous Substance Site, South East of Great Oakley/South West of Harwich

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
953	3528	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4150	Mrs Sally Webb [581]	Support	Support	Noted.

Policy PPL15: Safeguarding of Hazardous Substance Site, South East of Great Oakley/South West of Harwich

Summary of Representations

No changes to Policy PPL15 have been suggested within the representations submitted.

In response, there are no changes to be made to Policy PPL15 or its supporting text.

CHAPTER 8: CONNECTED PLACES

Policy CP1: Sustainable Transport and Active Travel

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
791	3715	Sport England (Mr Roy Warren, Planning Manager) [791]	The policy would support physical activity by encouraging developments to be designed to support active travel modes. This aligns with the Local Plan's vision and objectives as well as the health and wellbeing policies. The above policy requirements would accord with Sport England's Uniting the Movement Strategy and Active Design Guidance and would also be consistent with Government planning policy especially in paragraphs 96 and 129 of the NPPF.	Support	Noted.
349	4313	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Comments made by health partners	Comment	Comments noted. Policy CP1 supports active travel and reduced car dependency, which aligns with the Local Plan's wider health and wellbeing objectives and Policy HP1: Healthy Places. The Council will continue to work with health partners and infrastructure providers to ensure that new development supports healthier, accessible and well-connected places.
1654	13498	Natural England (Jonathan Burt) [1654]	We support policy aims to encourage development to provide options for sustainable travel including walking, cycling and public transport. We welcome requirements to ensure enhanced connectivity to existing public rights of way and, where possible, new links that improve access to the wider countryside and green infrastructure network and connections to the Sunshine Coast Greenway.	Support	Noted.
823	13550	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Section 8 supports the Council's intent to prioritise sustainable transport, high-quality digital connectivity, and a strong partnership with the Local Transport Authority. The Section aligns with the direction of the Essex Transport Strategy and signals a commitment to modal shift and active travel. However, to ensure the Local Plan fully reflects ECC's vision-led transport approach, journey minimisation, mode shift, quantifiable carbon reduction, inclusive access, freight decarbonisation, and digital mobility we recommend strengthening CP1, CP2 and CP3 through clearer obligations, safeguarding, and trigger-based delivery mechanisms. Key Cross-Cutting Recommendations ECC recommends the following overarching improvements: LCWIP & Active Travel Safeguarding (walking, wheeling & cycling routes) Explicitly safeguard and require phased delivery of LCWIP corridors across Tendring, particularly those connecting Garden Villages, rail stations, coastal centres, schools, key employment sites, and Healthy Streets priority areas. Ensure reference is made to ECC latest LCWIP Plan for Tendring (currently July 2025), for	Comment	The Council welcomes Essex County Council's support for the direction of Policy CP1 and will continue to work closely with Essex County Council as Local Highway Authority to ensure that the policy reflects a vision-led transport approach, supports sustainable travel and integrates with wider county-level transport priorities. Policy CP1 already requires development to provide safe, direct and attractive walking and cycling routes, enhanced connectivity to public rights of way and green infrastructure, and good walking and cycling connections to public transport nodes and interchanges. Developer contributions and infrastructure requirements will continue to be considered on a site-by-site basis through Transport Assessments, planning obligations and the Infrastructure Delivery Plan. It would not be appropriate to apply a blanket requirement preventing occupation before all transport infrastructure is delivered, but proportionate mitigation, phasing and delivery triggers will be secured where justified. In relation to the request that Policy CP1 reference partnership working with Network Rail, train operators and bus operators to secure increased service frequency, improved journey times, enhanced accessibility to stations and upgraded interchange facilities, the Council considers that this is already

			cycling and walking route network. Public Transport Integration (BSIP & Enhanced Partnership) Look to anchor public transport requirements under Essex's Bus Service Improvement Plan (BSIP) and statutory Enhanced Partnership, to help ensure bus priority, service integration and accessibility are deliverable and enforceable. Developer Obligations & Occupation Triggers Strengthen CP1/CP2 so that major development: • Delivers sustainable transport infrastructure before occupation • Contributes proportionately to corridor upgrades (A120/A133, RTS, station access) • Provides mobility hubs, bus priority, and active travel upgrades Transport Emission Reduction Requirements Look at mode share targets, carbon reduction trajectories and zero-emission freight and servicing strategies, building on the existing LTP3 and consistent with LTP4 and national decarbonisation guidance. Active Travel – Building on the existing LTP3 and LTP4 Alignment Add requirements for all major development to: • Apply the Essex Active Travel LCWIP Plans • Produce Active Travel Strategies • Undertake Healthy Streets Assessments • Demonstrate how mode shift targets identified in LTP4 will be met Mobility Hubs (Mandatory for major allocations) There is limited reference to Mobility Hubs in Local Plan policies therefore it is recommended inserting additional policy text referencing Essex Design Guide/Mobility Hubs Implementation Guide (Sept 2024) to support integrated travel and developer contributions. Demand Responsive Transport (DRT) Require DRT integration—particularly in rural settlements, Garden Villages, and low-density areas and aligned with ECC's DigiGo operating principles.		addressed in the Plan. Paragraph 8.25 states: "The Council will work with its partners, including National Highways, Essex County Council, bus and train operating companies, Network Rail and landowners, to safeguard and to explore opportunities to improve the District's strategic transport network. It will seek to make the transport network safer and more efficient, in order to: facilitate growth, trade and inward investment; help to improve the quality of life for local residents; and improve the experience for visitors to the District and will encourage improvements to the quality and frequency of rail and bus services and station facilities and their appearance." The Council accepts Essex County Council's recommendation that greater reference be made to local and county active travel strategies and guidance. Accordingly, Policy CP1 and supporting text will be amended to confirm that the Essex Cycling Strategy, relevant Local Cycling and Walking Infrastructure Plans (LCWIPs) and other relevant local strategies will be used to inform the provision of appropriate walking, wheeling and cycling infrastructure. The Council will also incorporate references to the Tendring District Cycling Action Plan, the Essex Walking Strategy 2021, the latest Essex County Council LCWIPs for Tendring and the Sunshine Coast Greenway objectives. These amendments will help ensure alignment with local and county priorities for active travel and support the safeguarding and phased delivery of identified LCWIP corridors, including those linking Garden Villages, rail stations, coastal centres, schools, key employment sites and Healthy Streets priority areas. The Council will also accept the following amendments proposed by Essex County Council: "Parking provision will be assessed using EPOA Parking Guidance and ECC EV Strategy. EV charging to follow Building Regulations Part S and the ECC EV Charge Point Strategy ensuring equitable provision for homes without off-street parking, mobility hub-based rapid charging, and commercial fleet/last-mile charging where relevant and prioritising locations identified by ORCS/LEVI funding assessments." and "All major developments must secure monitored Travel Plans with enforceable remedial mechanisms, demonstrating quantified mode share and carbon reduction trajectories building on the existing LTP3 and aligning with LTP4 and the national Transport Decarbonisation Plan." The Council considers that these amendments, in combination with the existing requirements of Policy CP1, will strengthen the policy's support for active travel, sustainable transport and transport decarbonisation whilst ensuring consistency with Essex County Council's strategic transport objectives.

			Rail The Plan should include a clearer commitment to improved rail services and station facilities. Rail plays a key role in reducing car dependency, supporting growth around Clacton, Harwich, the Garden Villages and Freeport East, and enabling mode shift for longer-distance commuting. The policy should reference partnership working with Network Rail and train operators to secure increased service frequency, improved journey times, enhanced accessibility to stations, and upgraded interchange facilities. ECC welcome the policy's requirement that development proposals incorporate attractive walking and cycling routes and improve access to the Green Infrastructure network. This approach is important because it not only promotes sustainable and active travel, but also enhances GI connectivity, increases opportunities for nature engagement, and contributes to healthier, more resilient places. It will be essential for the policy (CP1) to reference partnership working with Network Rail and train operators (also bus operators) to secure increased service frequency, improved journey times, enhanced accessibility to stations, and upgraded interchange facilities. (See full text for recommended wording changes)		
Businesses, Landowners and Developers					
136	4439	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	This policy is consistent with the NPPF and PPG and represents sound principles.	Support	Noted.
1439	13897	Catesby Estates [1439]	Catesby broadly support Draft Strategic Policies CP1 and CP2, which seek to promote sustainable transport, active travel, and improvements to the transport network in the District. The Site Land South of Oakley Road benefits from excellent existing sustainable transport links, including its close proximity to Oakley Road, which provides regular bus services (routes 3, 102, and 104) connecting the Site with Dovercourt Train Station, Colchester, and Clacton-on-Sea. Oakley Road also forms part of National Cycle Network Route 51, providing an existing route for cyclists. The Site offers opportunities to create new public footpaths and cycling connections, linking with the existing network and promoting sustainable travel choices. In addition, London is accessible via the Manningtree – London Liverpool Street train line to the north, further enhancing sustainable commuting options. These opportunities would support residents to be less reliant on private vehicles and encourage walking, cycling, and public transport as the preferred modes of daily travel, sustainably linking the new community with local jobs and facilities in Harwich, while providing new connections for the existing residents of Dovercourt. The Essex Way long-distance footpath passes through and alongside the Site's	Support	Noted.

			western and southern boundaries, following the line of the sea defence bund, and will be retained as part of the development, further enhancing connectivity and access to green infrastructure. Appropriate transport assessments will be undertaken to support planning applications, however, it is not anticipated that the Site would give rise to any significant transport constraints that would prevent its delivery. As the Site forms part of the draft allocation SAMU5, the Council has already recognised its capacity to come forward without unacceptable highway impacts. Catesby also support the objectives of CP2 to maintain and improve the transport network, prioritising sustainable modes of travel. The Site's delivery would align with these objectives by enabling safe and convenient pedestrian, cycle, and public transport access, while ensuring integration with local and strategic transport infrastructure. In summary, the Site is well-positioned to deliver a development that is highly accessible and sustainable, consistent with the objectives of CP1 and CP2, and can contribute positively to the wider transport and active travel network within the District.		
119	14067	Home Builders Federation (Mr Mark Behrendt, Planning Manager) [119]	HBF would suggest that attractive is removed from the first bullet point in paragraph 3. It is unlikely that all walking routes, and in particular the most direct will be attractive – especially if they are also to be safe and direct. In the fourth bullet point the council state that development must demonstrate greater connectivity between places and modes of transport. It is not clear why development should provider for greater connectivity. The level of connectivity should be what is required to make that development acceptable in planning terms. In some circumstances this may be more than existing provision but in others it may not. HBF would recommend that "greater" is replaced with "appropriate".	Comment	Comments noted. The Council considers that the reference to "attractive" walking and cycling routes is justified and consistent with national planning policy. Paragraph 111 of the National Planning Policy Framework December 2024 states that planning policies should "provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)." The Council therefore considers it appropriate to retain reference to safe, direct and attractive walking and cycling routes within Policy CP1. In relation to the wording "greater connectivity", the Council considers that this is also supported by national planning policy. Paragraph 117 of the National Planning Policy Framework December 2024 states that applications for development should "give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use." It also requires development to "address the needs of people with disabilities and reduced mobility in relation to all modes of transport" and to "create places that are safe, secure and attractive". The Council considers that Policy CP1's requirement for greater connectivity between places and modes of transport is therefore justified, proportionate and consistent with national policy.
1643	14204	Bradfield Fruit Farm (Johnny Piper) [1643]	We support the allocation of land at and adjacent to Bradfield Fruit Farm, arguing it performs significantly better against Policy CP1 (Sustainable Transport and Active Travel) than the alternative Rose site. We highlight short, safe walking distances to the primary school, village hall and services, strong footway provision, and opportunities to reduce car dependency. Evidence from walking distances, national travel data and Manual for Streets standards is cited to show the site would maximise active travel, reduce congestion and carbon emissions, and integrate development into daily village life, fully aligning with CP1 objectives.	Support	Noted.

982	14425	Turley (Claire Newbury, Associate Director) [982]	Catesby welcomes the updates to Policy CP1, which focuses on reducing reliance on the private car, and improving and encouraging walking and cycling networks. These objectives are most easily met when development can utilise and build on existing infrastructure, and are located in places with easy access to a wide range of shops and services that can be accessed by sustainable transport modes. Plains Farm represents such a site, and could readily plug into and enhance existing routes to encourage greater use of sustainable transport modes, with greater certainty and ease.	Comment	Noted.
Community Representatives					
953	3529	Mr Community Campaigner David Barton [953]	Free car parking and smooth highways for motorists much needed here and elsewhere to boost economic growth	Object	Comments noted. The Local Plan seeks to reduce dependence on private car travel while recognising that car access will remain necessary for some journeys, including for people with limited access to public transport or those needing to transport bulky goods. The Council will continue to work with Essex County Council and other partners to improve sustainable transport opportunities and will keep car parking provision and strategy under review, balancing the needs of town centres, visitors, residents and the cost of providing and maintaining car parks.
1712	14241	Bernard Jenkin [1712]	Public transport in the area, particularly for my constituents, remains limited with unreliable or non-existent bus services in areas. Improved walking and cycling routes are positive in principle but inaccessible to the vast majority, the aged who make much of our population, or those in remote areas. Connecting the Garden Villages to the Rapid Transport System (RTS) in the TCBGC as set out in the Local Plan Review is encouraging and if not completed, people will be left reliant on private methods of transport, or the existing local transport. The cancellation of the A12 widening scheme by Central Government further exacerbates congestion across the entire region. With A120/A133 congested frequently and the heavy reliance freight to Harwich International Port and Freeport East already has on these vital roads, with the expansion of housing and the expansion of the Freeport, the road capacity without improvement is insufficient. If bids for funding are made to the Department for Transport, I will support the councils as much as possible.	Comment	The Council thanks Mr Jenkins for his representation and for his support in terms of future bids to fund highway improvements. The Council recognises the concerns raised about limited and unreliable public transport, particularly in rural areas and for older residents, and agrees that walking and cycling improvements will not meet every transport need. The Local Plan is supported by a transport assessment and highway modelling, which will identify the mitigation needed for proposed growth, including impacts on the A120, A133, strategic routes serving Harwich International Port and Freeport East, and local road capacity. The Council will continue to work with Essex County Council, National Highways, public transport operators and Government to secure transport improvements.
34	14265	Colchester Cycling Campaign (Mr William Bramhill, Secretary) [34]	The Local Plan must actively reduce car dependency in line with Department for Transport forecasts and the National Planning Policy Framework. The Local Plan should use a clear target to limit traffic growth, robust early consideration of transport impacts, and mandatory use of the DfT connectivity tool to assess all developments. Poor-quality transport assessments should be rejected, particularly where cycling and walking are inadequately considered. The plan should take a holistic approach to active travel, rural lanes, signage, and developer contributions, ensuring sustainable, long-term transport solutions. Projects such as quiet lanes, hire bikes, and the Sunshine Coast Greenway should be embedded in the plan to support walking and cycling across the district. We would urge maximum liaison between Tendring, Active Travel England, Essex County Council (and/or its highways successor) to ensure that the forward tranche of Local Cycling and Walking Infrastructure Plans are protected and acted upon in a timely manner. Note that we have reached a stage where older cycleways are in need of modernisation to today's standards. We need to consider the use of low traffic neighbourhoods and introducing one-way schemes for motor traffic to	Comment	The Council supports the principle of reducing car dependency and improving walking, wheeling and cycling networks. Policy CP1 already requires safe, direct and attractive walking and cycling routes, improved links to public rights of way, connections to the wider countryside and green infrastructure network, and good links to public transport nodes and interchanges. The Council will continue to work with Essex County Council, Active Travel England and other partners to ensure that relevant Local Cycling and Walking Infrastructure Plan priorities, the Tendring Cycling Action Plan and the Essex Walking Strategy objectives are considered through plan-making and development management. Detailed route design, traffic management measures and developer contributions will be considered through site-specific assessments and infrastructure planning.

			provide the space for, and allow the building of, safe cycle routes (one example could be to restrict particular roads to one-way for motor traffic, creating room for a two-way cycle route).		
34	14271	Colchester Cycling Campaign (Mr William Bramhill, Secretary) [34]	Taking a holistic view, the overall local plan should consider cycling and walking connections to, from and in between all growth areas and large, medium and small settlements. Garden community - Please do not underestimate the importance of Crockleford Hill Bromley Road, as an exit for cyclists to and from the east. It is currently dangerous. Can it be filtered so that the only motor car access is by residents, could it be made one-way for motor traffic to provide space for a cycle route? We would like to see the creation of a new cycle route from Salary Brook meeting Wivenhoe Road/Bromley Road through the new country park and garden community. This should join onto a new cycle route from Bromley Road, across the existing A120 farm track bridge, to meet Church Road at St Anne's and St Lawrence, continuing to Elmstead, and then south from Elmstead to Wivenhoe. For routes, see https://docs.google.com/document/d/1ce4FSgy46_GZckcRi2ycuC7P69qA7CakfP-elZyJNxE/edit?usp=sharing. Waterhouse Lane and Grange Road should receive a quiet lane designation to provide a safe route from the garden community to Manningtree. (XB) A safe connection is needed to the Beth Chatto gardens from New Elmstead. (XB) Harwich, Dovercourt and Parkeston - The two towns and nearby Parkeston once had the highest cycling levels in Essex. Today the peninsula is an excellent example of how much cars are used for short trips (compare traffic levels on Main Road with that on the Oakley Road/Ramsey Road and Parkeston roundabout exits). As car traffic increased, cycle usage went down, mainly because of a lack of segregated provision on main roads. Cycle routes on Main Road from the Ramsey roundabout to Harwich Quay, Fronks Road, The Drive and Highfield Avenue would start to address matters. Other roads should be covered by an area-wide 20mph limit. Clacton, Frinton, and Walton - There are various opportunities to encourage cycle traffic within and between the Clacton, Frinton, and Walton. The Tendring Cycle Action Plan of 2018 should be updated accordingly and made part of the local plan. A fast, all-weather cycleway connecting the three would be ideal (ie, away from the promenades). Manningtree, Mistley and Lawford - ripe for filtering and/or a one-way system to take through car traffic away from the narrow Manningtree High Street and to create room for a cycleway to Manningtree railway station. A cycleway should be made along the length of Long Road and in Cox's Hill as soon as possible. Note that we hope to achieve a cycle route from Manningtree Station to Manningtree Road, Dedham, with a spur to Flatford. Cyclists should be borne in mind in any redevelopment of the Manningtree station tunnel/crossing.	Comment	The representation is noted. The Council agrees that the Local Plan should take a holistic approach to walking and cycling connections to, from and between growth areas, Garden Villages and settlements across the District. New Garden Villages and other major new developments will be expected to prioritise sustainable transport, including cycling, and to provide safe, direct and attractive active travel routes as part of their masterplanning and site-specific transport strategies. The precise alignment, design, feasibility, phasing and delivery of individual routes will be developed through the relevant masterplans, Transport Assessments, planning applications and infrastructure delivery processes, in consultation with Essex County Council as Local Highway Authority and other delivery partners. While the Local Plan must consider opportunities to promote sustainable transport, including walking and cycling, it is not the role of the Local Plan to assess and design every individual cycling scheme in detail. The Local Plan should identify strategic active travel requirements where they are necessary to support the spatial strategy or specific site allocations. More detailed consideration of route alignment, feasibility, prioritisation, funding and delivery is appropriately undertaken through the Local Transport Plan, Local Cycling and Walking Infrastructure Plan, Tendring Cycle Action Plan and the Infrastructure Delivery Plan. The Council will continue to work with Essex County Council, Active Travel England, neighbouring authorities and other partners to ensure that appropriate cycling and walking priorities are considered through plan-making, infrastructure planning and development management.

			Elmstead, Ardleigh, Bromley - By and large, Elmstead will receive an upgrade to cycleways as part of the garden community and other developments. Note our comment about Crockleford Hill (Bromley Road) above. Filtering and quiet lane status is needed in Ardleigh to connect it to Langham, both close to the Crown Interchange and along Birchwood Road (part of Colchester). Either Wick Lane or Harts Lane should be filtered and connections made to Langham Lane, possibly via Lodge Lane; Old Ipswich Tendring should lobby for improvements to the Crown Interchange itself so that it does not present a barrier to cyclists between Colchester and Ardleigh Brightlingsea - please see the Greenway plans. Bradfield, Ramsey, Wix and the Oakleys - please see the Greenway plans and our ambition for the B1352 to form a route into Colchester/Suffolk for continental tourists.		
1175	14451	ONTRACK Tendring Transport Users (John Smock) [1175]	ONTRACK submissions argue that sustainable development requires housing within 1.5km of a railway station or 1km of a frequent (half hourly) bus service, with good walking and cycling links, noting much recent housing is unsustainable due to poor public transport. They stress that transport infrastructure and service improvements should precede development, with enhanced bus services, improved stations, and new stations (e.g. Clacton North/Ardleigh). They emphasise protecting existing and disused rail corridors for future capacity, while highlighting concerns over congestion, freight impacts, and flood/high water table constraints affecting development viability. (SEE ATTACHMENTS FOR FURTHER INFORMATION)	Comment	The Council recognises the importance of locating growth where it can be served by sustainable transport and of improving walking, cycling, bus and rail connections. Policy CP1 seeks to reduce car dependency and requires development to provide good walking and cycling connections to public transport nodes and interchanges. The Council will continue to work with Essex County Council, Network Rail, train operating companies and bus operators to explore opportunities for improved services, station facilities, accessibility and interchange. Site-specific proposals, including any need to safeguard transport corridors or provide new infrastructure, will be assessed through the relevant allocation policies, Transport Assessments and the Infrastructure Delivery Plan.
90	13434	Tendring Parish Council (Mrs Marie Snell, Clerk/RFO) [90]	Large parts of the parish already lack adequate footways. This undermines: • Sustainable transport objectives. • Public health and active travel policies. • Accessibility for residents with mobility impairments or pushchairs.	Comment	Comments noted. Policy CP1 supports improved walking and cycling routes and recognises the need for safe, accessible and attractive connections. The Council will work with Essex County Council as Local Highway Authority to identify opportunities for improved footway provision, active travel links and accessibility enhancements through new development, site-specific mitigation and wider infrastructure planning.
Members of the Public					
976	3586	Ms Marianna White [976]	I object to the 300 additional houses in Brightlingsea as the infrastructure can not support. Single access road in and out which is at capacity and poor bus service.	Object	Concerns about local highway capacity, access and bus provision will be considered through the assessment of relevant site allocations and any subsequent planning applications. Development proposals will be expected to provide safe access and proportionate transport mitigation where necessary, informed by Transport Assessments and engagement with Essex County Council as Local Highway Authority and public transport providers.
526	3742	Mr kevin millar [526]	It is good to hear that the sunshine rail service is looking to have trains 2 per hour however there is still a need for a Sunday service to more stations as work is no longer a Monday to Friday. A Sunday train service would reduce traffic on already congested roads as day visitors visit the area.	Comment	The Council supports improved rail services and recognises their potential to reduce car dependency and support sustainable visitor and commuter travel. The Council will continue to work with Network Rail, train operating

					companies and other partners to explore opportunities for improved service frequency, journey times, station accessibility and interchange facilities.
1337	3985	Captain Andrew Rudge [1337]	With regard to SAH3 land off Ransome Way. The most likely access to this proposed development is from Kirby Road via Elliots drive, Wade Reach and Lowe Chase. Currently the "T" junction between Elliots Drive and Kirby Road is dangerous because you are partly blind to traffic heading towards Walton when exiting Elliots Drive . Additional traffic from the proposed new development would significantly increase the risk of a serious accident at this junction.	Comment	Site-specific highway safety and access matters will be considered through the relevant allocation policy and any subsequent planning application. Development proposals will need to demonstrate safe and suitable access for all users and provide proportionate mitigation where required, in consultation with Essex County Council as Local Highway Authority.
1337	3996	Captain Andrew Rudge [1337]	I agree with the objectives of Policy CP1 attempts at improving the accessibility to housing and leisure in the Walton area, and wider tendering peninsula. However the roads struggle to cope with the current demand, especially in the summer months when the tourist arrive. One road blockage/closure for repairs results in significant disruption. The policy talks of principles, but considerable investment in our roads and other sustainable transport is required to change the reality on our roads BEFORE adding new developments and more businesses, particularly to roads and public transport between Thorpe and Walton on the Naze.	Support	Comments noted. The Council recognises that transport infrastructure and service improvements will be necessary to support planned growth and reduce car dependency. The transport evidence base, including highway modelling, will inform the mitigation required for the Local Plan. The Council will work with Essex County Council, National Highways, bus operators, Network Rail and train operating companies to secure proportionate improvements to roads, public transport and active travel networks through the Infrastructure Delivery Plan, developer contributions and planning obligations where justified.
1352	4073	Mrs Paula Bland [1352]	Dedicated cycle lanes to be built when constructing new roads and these need to be kept free of parked cars.	Comment	Policy CP1 supports the provision of safe, direct and attractive walking and cycling routes and requires development to link to existing networks. The detailed design of new roads, cycle lanes and parking controls will be addressed through site-specific proposals, highway design standards and consultation with Essex County Council as Local Highway Authority.
581	4151	Mrs Sally Webb [581]	Efforts should be made to enable people to walk or cycle now, pavements are often unsuitable outside of towns.	Comment	The Council supports measures that enable more people to walk and cycle, including in rural areas where provision can be more limited. Opportunities to improve pavements, active travel links and accessibility will be considered through development proposals, the Local Cycling and Walking Infrastructure Plan, the Tendring Cycling Action Plan, the Essex Walking Strategy and wider infrastructure planning with Essex County Council.
1376	4221	Mrs Anja Newman [1376]	Rural bus transport is not yet integrated with trains. Manningtree railway station does not have bus services from the villages. Increased housing stock must consider bus routes. Horsley Cross has no bus routes.	Comment	The Council recognises the importance of integrating rural bus services with rail and ensuring that new development considers access to public transport. Policy CP1 requires good walking and cycling connections to public transport nodes and interchanges. The Council will continue to work with Essex County Council and bus and train operators to seek improvements to service coverage, frequency, accessibility and interchange where feasible.
1417	4382	Mr reginald tricker [1417]	Well intentioned policy but no specific routes identified. Is there an LCWIP that can be referred to? Appears to be little evidence to underpin needs for sustainable modes, cf. road based schemes. This policy only seems to relate to applications but what about the wider strategic needs for a safe walking and cycling network across Tendring (that is also missing in LTP4)? Garden Villages should be refeferenced in the opening para inc. Weeley.	Comment	The Council will consider whether Policy CP1 or supporting text should include clearer reference to the Local Cycling and Walking Infrastructure Plan and the safeguarding of relevant routes where affected by development. The policy already requires development proposals to provide safe, direct and attractive walking and cycling routes, connect to existing networks and public rights of way, and align with the Tendring Cycling Action Plan, the Essex Walking Strategy and Sunshine Coast Greenway objectives. Wider strategic active travel needs, including links to Garden Villages, will be considered through the Infrastructure Delivery Plan, site allocations and partnership working with Essex County Council.

969	4426	Mr Scott Gilmour [969]	Emphasis on providing a plethora of transport options and reducing reliance on car travel is very encouraging. Vehicles contribute to numerous environmental issues as well as being subjected to market volatility. Reducing reliance makes communities more resilient. Tendring is perfectly suited for active travel infrastructure which is a shame to see how underdeveloped it currently is. Hopefully schemes such as the Sunshine Coast Greenway is a step to see this improve. Likewise improving public transport is essential to bolster options and overall encourage modal shift.	Support	Noted. The Council welcomes support for the policy's emphasis on reducing car dependency, improving active travel infrastructure and strengthening public transport. The Sunshine Coast Greenway and other active travel initiatives will continue to be considered through the Local Plan, Infrastructure Delivery Plan and partnership working with Essex County Council and other delivery partners.
1385	4505	Mrs Monica Kurnatowska [1385]	Proposals for housing are unrealistic and will increase reliance on cars in the villages like Wix, Wrabness and Bradfield where there is no employment, and limited services. Even electric cars produce emissions and require electricity generation so there is no such thing as a sustainable option. TDC has no ability to ensure improvement of public transport to these sites. The local roads are small lanes with no pedestrian options and limited passing places. The A120 is also in a poor state and has very heavy traffic from Harwich, where most people already commute	Comment	The Council recognises that some rural settlements have limited services, employment opportunities, public transport and pedestrian infrastructure. The spatial strategy, site allocations and Policy CP1 seek to support sustainable patterns of development and reduce car dependency where possible. Site-specific impacts on local roads, public transport, walking and cycling will be assessed through Transport Assessments and considered with Essex County Council as Local Highway Authority, with mitigation and developer contributions secured where justified.
1495	14184	Martine Ward [1495]	Tendring's transport network is already operating beyond its safe capacity, and further growth will intensify pressures that the district is not equipped to manage. The A133 has become a corridor of congestion, speeding, and dangerous overtaking. Traffic levels have increased steadily due to continuous housing development, commercial expansion, and the early stages of national infrastructure works. Even before several major projects have fully begun, the road network is struggling to cope. Public transport provision is also inadequate for a growing population. Elmstead is served by a single hourly bus service, which is frequently delayed, cancelled, or stops running without warning. This level of provision is insufficient for a settlement that is expanding at pace. As the population grows, reliance on an unreliable and infrequent bus service forces more residents into cars, increasing congestion, emissions, and safety risks. The installation of a pedestrian crossing — finally being delivered after years of residents fighting for a safe way to cross the road to reach the bus stop or the school and paid for by the village years ago— demonstrates the existing risks faced by the community. Traffic volumes and behaviours are now inconsistent with rural settings. As the settlement continues to expand, the road environment is shifting from village conditions toward urban intensity. Construction vehicles, HGVs, and abnormal-load movements associated with gravel extraction, infrastructure projects, and commercial redevelopment will add further strain. These pressures will overlap, creating cumulative impacts that the current road network and public transport system cannot absorb without compromising safety and quality of life. The Neighbourhood Plan must recognise that infrastructure capacity is already stretched and that further development must not be permitted without clear, enforceable measures to manage traffic, improve safety, and significantly strengthen public transport provision.	Comment	The Council recognises existing pressures on the A133 and the need for public transport and highway improvements to support growth. The Local Plan is supported by transport evidence and highway modelling which will identify the mitigation needed for planned development. The Council will work with Essex County Council, National Highways, public transport operators and other partners to secure proportionate mitigation, public transport improvements and active travel measures through the Infrastructure Delivery Plan, developer contributions and planning obligations where appropriate.

Policy CP1: Sustainable Transport and Active Travel

Summary of Representations
Policy CP1 received a mixture of support, comments and objections. Support was given for the policy's emphasis on reducing car dependency, encouraging active travel, improving walking and cycling routes, connecting development to public transport and green infrastructure, and supporting wider health and wellbeing objectives. Several respondents considered the policy to be consistent with national planning policy and welcomed links to public rights of way, the Sunshine Coast Greenway and sustainable transport networks. Key comments sought stronger reference to Local Cycling and Walking Infrastructure Plans, safeguarded walking, wheeling and cycling corridors, active travel strategies, Healthy Streets principles, mobility hubs, demand responsive transport, bus service improvements, rail improvements and better integration between bus and rail services.

Respondents also raised concerns about rural areas where public transport is limited, pavements are poor or absent, and walking and cycling may not be practical for all residents, including older people and those in more remote locations. A number of representations raised concerns about highway capacity, congestion, road safety and the ability of the existing transport network to accommodate planned growth, including on the A120, A133, routes serving Brightlingsea, Walton, rural villages, Harwich International Port and Freeport East. Some respondents argued that transport infrastructure, public transport improvements and active travel measures should be delivered before or alongside new development, and that site-specific impacts should be fully assessed.

The Council responses note that Policy CP1 already requires development to provide safe, direct and attractive walking and cycling routes, connect to public rights of way and green infrastructure, and provide good walking and cycling links to public transport nodes and interchanges. The Council will accept the following amendments proposed by Essex County Council: "Parking provision will be assessed using EPOA Parking Guidance and ECC EV strategy. EV charging to follow Building Regulations Part S and the ECC EV Charge Point Strategy ensuring equitable provision for homes without off street parking, mobility hub based rapid charging, and commercial fleet/last mile charging where relevant and prioritising locations identified by ORCS/LEVI funding assessments." And "All major developments must secure monitored Travel Plans with enforceable remedial mechanisms, demonstrating quantified mode share and carbon reduction trajectories building on the existing LTP3 and aligning with LTP4 and the national Transport Decarbonisation Plan." Policy CP1 and supporting text will also be amended to confirm that the Essex Cycling Strategy, relevant Local Cycling and Walking Infrastructure Plans (LCWIPs) and other relevant local strategies will be used to inform the provision of appropriate walking, wheeling and cycling infrastructure. The Council will also incorporate references to the Tendring District Cycling Action Plan, the Essex Walking Strategy 2021, the latest Essex County Council LCWIPs for Tendring and the Sunshine Coast Greenway objectives. These amendments will help ensure alignment with local and county priorities for active travel and support the safeguarding and phased delivery of identified LCWIP corridors, including those linking Garden Villages, rail stations, coastal centres, schools, key employment sites and Healthy Streets priority areas.

Detailed route design, traffic management measures, parking controls, developer contributions and mitigation requirements will be addressed through site-specific assessments, Transport Assessments, planning obligations and the Infrastructure Delivery Plan. The route-specific walking and cycling proposals raised in representation 14271, including links relating to the Garden Community, Harwich, Dovercourt, Parkeston, Clacton, Frinton, Walton, Manningtree, Mistley, Lawford, Elmstead, Ardleigh, Bromley and other settlements, will be considered through the relevant masterplans, the Local Cycling and Walking Infrastructure Plan (LCWIP), the Tendring Cycling Action Plan, the Infrastructure Delivery Plan and other delivery mechanisms, rather than through the strategic policy itself. The Council also acknowledges concerns about public transport provision, rural accessibility, highway safety and congestion and will continue to work with Essex County Council, Active Travel England, National Highways, Network Rail, transport operators and other partners to secure appropriate improvements to transport infrastructure and services. The Local Plan transport evidence, including highway modelling, will inform the mitigation required to support planned growth.

Policy CP2: Improving and Maintaining the Transport Network

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
349	4315	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Comments by health partners	Comment	Comments noted. Policy CP2 supports the improvement and maintenance of the transport network, including measures that can improve accessibility to services and facilities. The Council will continue to work with health partners, Essex County Council and infrastructure providers to ensure that planned growth is supported by appropriate transport mitigation and accessible connections.
1653	13448	Suffolk County Council (Georgia Teague) [1653]	Transport SCC considers that the impact of these allocated developments is very unlikely to significantly impact upon the adjacent Suffolk highway network. SCC notes paragraph 8.28, which states "The Council will explore, in partnership with Essex County Council, Suffolk County Council, Babergh District Council and Network Rail, opportunities to improve the A137 and railway crossing/underpass at Manningtree Station." SCC will continue to liaise with colleagues from the neighbouring authorities on this piece of work.	Comment	Noted.
823	13548	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The evidence demonstrates that, without mitigation, growth from the preferred site allocations would result in severe congestion at several key network locations. However, a vision-led mitigation strategy, integrating sustainable transport measures with targeted highway and traffic management interventions has the potential to manage these impacts effectively. Further detail on the key mitigation schemes, however, will be required at the Regulation 19 stage. The preferred Spatial Option for the Local Plan period up to 2042 is therefore considered acceptable only on a conditional basis and only for the Plan period to 2042, subject to the development and demonstration of effective mitigation packages (both highway and sustainable transport) capable of addressing the identified network issues. Accordingly, acceptance is pending the following: • Identification of the required highway mitigation interventions • Demonstration that these mitigation measures are deliverable • Integration of robust sustainable transport packages • Testing and validation of the proposed mitigation within the Regulation 19 evidence base If under Regulation 19 TDC intend to set any safeguarding strategic policy for site growth beyond 2042 (i.e. Garden Villages), then the Highway Authority could need to consider the impact of growth beyond 2042 at the Reg 19 stage. Given locations of the proposed new strategic scale growth, including Garden	Comment	The Council welcomes Essex County Council's comments and will continue to work closely with Essex County Council as Local Highway Authority in preparing the Regulation 19 transport evidence. The evidence base will test planned growth, identify necessary highway and sustainable transport mitigation, consider deliverability and phasing, and inform the Infrastructure Delivery Plan. The Council agrees that mitigation should be vision-led and should integrate sustainable transport, public transport, active travel and proportionate highway improvements. Detailed requirements for Transport Assessments, construction logistics, servicing plans and mobility hub design are more appropriately considered through site-specific planning applications, planning obligations and relevant Essex County Council guidance rather than set out in excessive detail in Local Plan policy.

			Villages, the need for strong upfront investment in both sustainable on-site and off-site transport infrastructure (along with the necessarily highway mitigation) and strong on-site services and facilities (schools, shops, leisure, employment, etc) is likely to be essential so that car dependency is not created. Street Design Requirements • Movement & Place Street typologies • Healthy Streets-based public realm • Traffic reduction strategies around schools, stations, and centres Rail The need for strategic rail enhancement alongside road and bus improvements. Given the scale of housing and employment growth, particularly along the A120/A133 corridor, the Plan should support expansion of rail capacity, station improvements, and service reliability as part of the integrated transport network. Rail improvements should be prioritised where they unlock sustainable access to Freeport East and key settlements. Recommended amendments: Rapid Transit & Mobility Hubs (Insert suggested new clause) 1. "Major allocations must provide bus/Rapid Transit-ready corridors and mobility hubs, including secure cycle parking, micro-mobility, car club bays, EV charging and real-time information, building on the existing LTP3 and consistent with ECC's LTP4 area implementation plans." 2. Freight & Construction Logistics (Insert new clause) "Major developments to produce Construction Logistics Plans and Delivery & Servicing Plans, exploring opportunities for zero-emission last-mile logistics and consolidation, particularly within town centres and the Freeport-to-A120 corridor." 3. TA Scoping & Severe Impact Test (Clarification) Insert wording: "Transport Assessments shall be scoped with ECC, addressing safety, capacity, accessibility, public transport, active travel, and place-making principles. Mitigation will prioritise active travel and bus/Rapid Transit solutions before any highway capacity additions, consistent with the NPPF." 4. Movement Hierarchy (Add to CP2) "Proposals should demonstrate building on the existing LTP3 and the application of the LTP4 road user hierarchy—walking, wheeling, cycling and public transport first—before car-based solutions are considered."		
939	13616	National Highways (Mark Norman, Spatial Planner) [939]	National Highways welcomes the opportunity to provide comments on the draft Tendring Local Plan. National Highways has been appointed by the Secretary of State for Transport as a Strategic Highway Company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street	Comment	The Council welcomes National Highways' comments. The Council recognises the importance of ensuring that the impacts of planned growth on the Strategic Road Network are robustly assessed and appropriately mitigated where necessary. The Council will continue to work positively and collaboratively with

			authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery part to national economic growth. Within the Plan area, the SRN comprises the A12 and the A120 between the A12 and the Port of Harwich. In responding to local plan consultation, we have regard to DfT Circular 02/2022 The Strategic Road Network and the delivery of sustainable development (the Circular) which sets out how interactions with the SRN should be considered in the making of local plans. In addition to the DfT Circular 02/2022, this response is provided in accordance with the National Planning Policy Framework (NPPF) and other relevant policies. Based upon our initial review of the reports and supporting documents available to us, we have identified a number of areas where further information and / or clarification is required to enable us to complete our review of the draft plan. The plan commits to the delivery of approx. 9000 homes and 47Ha of employment land over the course of the plan period. At present, National Highways cannot establish whether the level of growth proposed can be accommodated on the SRN, as the transport evidence base or the strategic transport assessment to support the plan are still being developed. While we have been involved in a number of meeting and discussions, these have not yet reached a conclusion. Further comments on the modelling is contained in Aecom Technical Note 1,2 and 3. We anticipate that a final transport evidence base will be submitted in support of the plan. This will provide National Highways, as the Strategic Highway Authority, with a clear and defined reference case for working alongside Local Highway Authorities to plan and mitigate impacts of forthcoming future development, enabling infrastructure for growth. Appropriate mitigation can be identified and a strategy for funding identified. From the work undertaken to date, it is clear a number of locations are under pressure. Of particular concern are junctions A12 j29 and Horsley Cross. We welcome and fully support the plan's statements on the need for an integrated and sustainable transport network that seeks to encourage modal shift to public transport and active travel. We also welcome the commitment to bus rapid transit in Colchester. If the local plan development is to come forward in a sustainable way, the timing and delivery of all parts of the development contained within the plan and the supporting infrastructure will be critical. This is always a challenge. National Highways works on many local plans and has much experience to bring to such challenges forward. As such I draw your attention to the guidance set out in the document "Working with National		National Highways on the preparation of the transport evidence base, including transport assessments and highway modelling, to understand and address the effects of development on the Strategic Road Network. The Council also welcomes National Highways' ongoing involvement in considering strategic transport improvements, infrastructure delivery and lorry parking provision. Policy CP2 now includes criteria for assessing dedicated lorry parking and driver facilities, following changes made to the policy in response to National Highways' representations. The Council therefore considers that an appropriate policy framework is already in place and looks forward to continuing its constructive partnership with National Highways as the Local Plan progresses.

			Highways to deliver a vision-led approach for Local Plans" local-plan-brochure.pdf The plan identifies three locations for major housing growth: i) Horsley Cross, ii) Hare Green, iii) Wheeley and Tendring/Colchester Garden Community (partly in Colchester) All of these sites have been tested in the model working still being developed. The Horsley Cross site has, as would be expected, the larger impact on the A120. Paragraph 81 of Circular 01/2022 establishes that in areas where there is an identified need for greater lorry parking provision, National Highways will work with relevant local planning authorities to ensure that local plan allocations and planning application decisions address the shortage. National Highways Lorry Parking Demand Assessment provides lorry parking demand score for each local authority in England based on DfT lorry parking survey data. The data is comprised of an assessment of both existing lorry parking provision and demand near the SRN in England. National Highways would welcome specific attention to lorry parking and would be keen to work with you in undertaking this. This could include the investigation and allocation of a dedicated lorry parking facility within the plan, or a policy of requiring adequate lorry parking and lay over facilities at proposed employment sites and roadside service facilities would be welcomed. National Highways is committed to continue to work with your authority in a collaborative and constructive manner to support the progression of the plan. We will work with you to develop a greater understanding of the impact of the development upon the SRN. We trust the above comments are helpful in the progression of your proposals and welcome continued discussions with the council to this end.		
Businesses, Landowners and Developers					
136	4443	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	The principles of this policy have been incorporated into the proposals for Weeley Green Garden Village.	Support	Noted.
1439	13898	Catesby Estates [1439]	Catesby broadly support Draft Strategic Policies CP1 and CP2, which seek to promote sustainable transport, active travel, and improvements to the transport network in the District. The Site benefits from excellent existing sustainable transport links, including its close proximity to Oakley Road, which provides regular bus services (routes 3, 102, and 104) connecting the Site with Dovercourt Train Station, Colchester, and Clacton-on-Sea. Oakley Road also forms part of National Cycle Network Route 51, providing an existing route for cyclists. The Site offers opportunities to create new public footpaths and cycling connections, linking with the existing network and promoting sustainable travel	Support	Noted.

			choices. In addition, London is accessible via the Manningtree – London Liverpool Street train line to the north, further enhancing sustainable commuting options. These opportunities would support residents to be less reliant on private vehicles and encourage walking, cycling, and public transport as the preferred modes of daily travel, sustainably linking the new community with local jobs and facilities in Harwich, while providing new connections for the existing residents of Dovercourt. The Essex Way long-distance footpath passes through and alongside the Site's western and southern boundaries, following the line of the sea defence bund, and will be retained as part of the development, further enhancing connectivity and access to green infrastructure. Appropriate transport assessments will be undertaken to support planning applications, however, it is not anticipated that the Site would give rise to any significant transport constraints that would prevent its delivery. As the Site forms part of the draft allocation SAMU5, the Council has already recognised its capacity to come forward without unacceptable highway impacts. Catesby also support the objectives of CP2 to maintain and improve the transport network, prioritising sustainable modes of travel. The Site's delivery would align with these objectives by enabling safe and convenient pedestrian, cycle, and public transport access, while ensuring integration with local and strategic transport infrastructure In summary, the Site is well-positioned to deliver a development that is highly accessible and sustainable, consistent with the objectives of CP1 and CP2, and can contribute positively to the wider transport and active travel network within the District.		
Community Representatives					
953	3530	Mr Community Campaigner David Barton [953]	Free car parking and smooth highways for motorists much needed here and elsewhere to boost economic growth	Comment	Comments noted. The Local Plan seeks to reduce dependence on private car travel while recognising that car access will remain necessary for some journeys, including for people with limited access to public transport or those needing to transport bulky goods. The Council will continue to work with Essex County Council and other partners to improve sustainable transport opportunities and will keep car parking provision and strategy under review, balancing the needs of town centres, visitors, residents and the cost of providing and maintaining car parks.
1550	13979	PACE (John Hall) [1550]	I did not spot any specific reference to the improvements to the Manningtree Crossing. This is surely one of the most significant black spots for road and rail and cycle and footpath infrastructure. The Manningtree area has seen significant expansion of housing in the last 10 years and a significant part of this is still to be built out – yet there has been no improvement to this blackspot. In addition the Tendring Local Plan must surely take in to account the significant level of development that is taking place in Brantham and East Bergholt – although in Suffolk these new residents are all focussing on the Manningtree Rail Station and Facilities – so that must be factored in. Tendring cannot	Comment	Comments noted. Paragraph 8.28 expressly refers to partnership working with Essex County Council, Suffolk County Council, Babergh District Council and Network Rail to explore opportunities to improve the A137 and the railway crossing/underpass at Manningtree Station. The Council recognises the cross-boundary importance of this location and will continue to work with relevant partners to consider options, funding opportunities and the relationship with growth in both Tendring and neighbouring authority areas.

			consider any new housing developments without improvement to this vital piece of infrastructure.		
1175	14433	ONTRACK Tendring Transport Users (John Smock) [1175]	(Regarding Clacton-on-Sea) Clacton-on-Sea station is located centrally, convenient for the town centre, beach, pier, etc. but new developments now need to be located on the periphery of the town, thus requiring a bus journey to access the train. To some extent this problem could be alleviated by constructing a new station adjacent to Gorse Lane level crossing which would be conveniently close to the nearby industrial area. Such a station has been the subject of a campaign by the Railway Development Society (now RailFuture) some 50 years ago but was never brought to fruition.	Comment	The Council recognises the importance of locating growth where it can be served by sustainable transport and of improving walking, cycling, bus and rail connections. The Council will continue to work with Essex County Council, Network Rail, train operating companies and bus operators to explore opportunities for improved services, station facilities, accessibility and interchange. Site-specific proposals, including any need to safeguard transport corridors or provide new infrastructure, will be assessed through the relevant allocation policies, Transport Assessments and the Infrastructure Delivery Plan.
1175	14450	ONTRACK Tendring Transport Users (John Smock) [1175]	(Regarding Weeley) This development is very convenient for bus services and the railway station provided that the detailed planning makes provision for good walking routes to the station. However, train services will need timetable improvements as will do station access and facilities.	Comment	The Council recognises the importance of locating growth where it can be served by sustainable transport and of improving walking, cycling, bus and rail connections. The Council will continue to work with Essex County Council, Network Rail, train operating companies and bus operators to explore opportunities for improved services, station facilities, accessibility and interchange. Site-specific proposals, including any need to safeguard transport corridors or provide new infrastructure, will be assessed through the relevant allocation policies, Transport Assessments and the Infrastructure Delivery Plan.
262	5230	Great Bromley to Council (Lizzie Ridout, Clerk) [262]	Existing transport and utility infrastructure – including the A120/A133 corridor, public transport provision and electricity networks – is insufficient for the planned growth and that there is no clear funding strategy.	Comment	Comments noted. The Local Plan will be supported by transport evidence, highway modelling and an Infrastructure Delivery Plan which will identify the mitigation and infrastructure required to support planned growth, including on the A120/A133 corridor and public transport network. The Council will work with Essex County Council, National Highways, utility providers and other infrastructure partners to identify deliverable schemes, funding sources and appropriate developer contributions or planning obligations where justified.
235	6836	Alresford Parish Council (Mr Matt Cooke, Alresford Parish Council Clerk) [235]	We are concerned that the Rural Service Centres rely too heavily on the railway; given that road transport remains dominant, traffic congestion must be tackled and rail use alone will not resolve the transport challenges.	Comment	The Council recognises that rail access alone will not address all transport needs and that road transport will remain important for many journeys. Policy CP2 seeks to improve and maintain the wider transport network, including strategic and local highway capacity, public transport, active travel and interchange. Site-specific and cumulative traffic impacts will be assessed through the transport evidence base, Transport Assessments and engagement with Essex County Council as Local Highway Authority, with proportionate mitigation secured where necessary.
235	6846	Alresford Parish Council (Mr Matt Cooke, Alresford Parish Council Clerk) [235]	We note that the existing road network is already inadequate for the scale of new housing and must be substantially upgraded, echoing the chapter's call for improvement of the strategic road network (A120, A133, A137 and new links).	Comment	Comments noted. The Council recognises concerns about the capacity and condition of the existing road network. The Local Plan transport evidence and highway modelling will consider the cumulative impacts of planned growth on the strategic and local road network, including the A120, A133, A137 and relevant local links. Necessary and proportionate mitigation will be identified through the evidence base and Infrastructure Delivery Plan and secured through developer contributions, planning obligations and partnership working where justified.
90	13433	Tendring Parish Council (Mrs	Tending Parish Council has serious concerns regarding highway safety, particularly in relation to excessive vehicle speeds along Crow Lane and Crown Lane, which are already problematic areas.	Comment	The Council recognises the highway safety concerns raised, including vehicle speeds, narrow rural lanes, limited visibility, lack of continuous footways and limited crossing opportunities. Site-specific impacts associated with Weeley

		Marie Snell, Clerk/RFO) [90]	This includes: • Traffic speeds regularly exceed safe levels. • The rural nature of these lanes includes narrow carriageways and limited visibility. • There are no continuous pavements, rendering pedestrian movement unsafe. • There is limited street lighting and few safe crossing points. The proposed additional housing (at Weely and Horseley Cross) would inevitably increase traffic flows along these roads, significantly heightening risks to pedestrians, cyclists, children, and elderly residents. Without comprehensive traffic calming, enforceable speed reduction measures, and provision of safe pedestrian infrastructure, further development would exacerbate an already dangerous situation.		and Horsley Cross will be assessed through the relevant allocation policies, Transport Assessments and consultation with Essex County Council as Local Highway Authority. Where necessary, proportionate traffic calming, speed management, pedestrian infrastructure and other mitigation will be secured through planning obligations or conditions.
258	13610	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support the additions made to this policy as the transport network already struggling can only come under more pressure due to the housing targets.	Support	Noted.
244	13647	Ardleigh Parish Council (Ardleigh Parish) [244]	Transport and Accessibility The Local Plan relies heavily on: Delivery of major road schemes (e.g. A120/A133 link) However: Delivery is uncertain Rural roads may face increased HGV traffic Request: Firm guarantees on transport infrastructure Investment in public transport, walking, and cycling networks	Comment	Comments noted. The Council recognises that strategic transport infrastructure must be deliverable and supported by investment in public transport, walking and cycling. The transport evidence base and Infrastructure Delivery Plan will identify necessary mitigation and delivery mechanisms for planned growth. The Council cannot provide guarantees for schemes dependent on third-party funding or delivery, but will continue to work with Essex County Council, National Highways and other partners to secure proportionate and deliverable improvements.
258	14176	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We support the additions made to this policy as the transport network already struggling can only come under more pressure due to the housing targets.	Support	Noted.
Members of the Public					
1118	3899	Mrs Teresa Philp [1118]	After attending the Presentation at Frating Memorial Hall about the Hare Green Garden Village I wish to make the following comments. Housing is needed for our growing population but it would be beneficial if the infrastructure was in place before flooding the area with thousands of new residents. Our doctors surgeries struggle to cope now. We have insufficient schools and hospitals. Our roads are in an abysmal state, as are the pavements & drains. Everytime Frating floods, we hear that the pumping stations are at maximum capacity already.	Comment	Comments noted. The Council recognises that infrastructure, including transport, health, education, drainage and utilities, must be planned alongside growth. Policy CP2 deals specifically with transport matters, and the wider Local Plan and Infrastructure Delivery Plan will identify the infrastructure required to support development, including phasing and delivery mechanisms where appropriate. Site-specific impacts will be considered through allocation policies and subsequent planning applications.

			These problems should be sorted out before further development is considered.		
1106	3942	Mr Jack Martin [1106]	While the policy promotes sustainable transport, it relies heavily on major new road infrastructure, which risks increasing traffic rather than reducing it. Prioritising large developments around key routes like the A120 and A133 could worsen congestion and air pollution, undermining environmental goals. There is also limited certainty that public transport improvements will be delivered early enough to influence travel behaviour. Overall, the approach appears car-dependent and lacks firm commitments to genuinely shift travel towards sustainable modes before development takes place.	Object	The Council recognises the concern that new road infrastructure can, if not carefully planned, reinforce car dependency. Policy CP2 should be read alongside Policy CP1, which seeks to reduce dependence on private car travel and promote walking, cycling and public transport. The Regulation 19 transport evidence will test both highway and sustainable transport mitigation and will inform a balanced package of interventions. The Council will seek to ensure that transport improvements support modal shift, manage congestion and address safety and environmental impacts.
1352	4077	Mrs Paula Bland [1352]	This is a very difficult one when all buses are operated by private contractors who must make a profit. Realistically more public transport and greater use of public transport can only be achieved when the buses are in public ownership and the fares are subsidised which may eventually result in the routes paying their way or becoming profitable and able to subsidise non profitable routes.	Comment	Noted.
753	4211	Mr Martin Colley [753]	No mention is made to the road network supporting the communities of Thorpe-le-Soken, Frinton and Walton. With the increased housing development proposed in this area the main link road (B1033) from the A133 at Weeley to the Frinton/Walton area is unlikely to be able to accommodate the increase in traffic. At present the roads through and around Thorpe-le-Soken can be potential bottle-necks with times when they are at a complete standstill, especially if there are any roadworks taking place. This is only likely to get worse as more housing is built.	Comment	Comments noted. The Local Plan transport evidence will consider the cumulative impacts of planned growth on relevant local and strategic routes, including links serving Thorpe-le-Soken, Frinton and Walton where affected by proposed development. Any site-specific impacts will be assessed through Transport Assessments and consultation with Essex County Council as Local Highway Authority, with proportionate mitigation secured where necessary.
822	4477	Rachel Fletcher [822]	The Hare Green development will need more than a new junction to make it safe and sustainable for existing residents.	Object	The Council recognises that major development at Hare Green would require more than a single access solution if it is to be safe, sustainable and well integrated. The transport evidence base, allocation policy and any subsequent planning application will need to demonstrate safe and suitable access, appropriate walking, cycling and public transport connections, and proportionate highway mitigation in consultation with Essex County Council as Local Highway Authority.
1489	13726	Jim Macaulay [1489]	There is support for the Plan's economic growth ambitions, but Policy CP2 is currently insufficient to meet the operational needs of heavy freight logistics. The policy wrongly assumes B2/B8 allocations can accommodate 24/7 port related HGV activity, despite its distinct land use characteristics, impacts and locational needs. This conflicts with the Plan's intent to support port expansion, Freeport East and supply chains, and leaves the evidence base incomplete. CP2 should be amended to explicitly recognise heavy freight logistics as a distinct use, allocate/safeguard suitable land (notably near the A120/Harwich Port), and the Plan should also introduce a criteria based policy to manage impacts.	Comment	The Council recognises the importance of freight and logistics to Harwich International Port, Freeport East and the wider economy. Policy CP2 already includes criteria for dedicated lorry parking and related driver amenities. The Council will consider whether further clarification is required in policy or supporting text regarding the operational needs of freight and logistics, while ensuring that any proposals are assessed against highway safety, residential amenity, environmental impacts, access to the strategic road network and evidence of need.
1529	13763	Dawn Baran [1529]	There is support for improving housing and leisure accessibility in Walton but concerns that public transport capacity has not kept pace with demand. Significant investment would be needed in bus and rail services to avoid increased car use, road safety issues and congestion. Existing roads already struggle, particularly during peak tourist seasons, where minor closures cause severe traffic delays. While policy sets out aspirations, residents and businesses experience ongoing capacity problems. Further largescale development and commercial growth would intensify pressure on an already	Comment	Comments noted. The Council recognises existing transport pressures affecting Walton and the wider peninsula, including seasonal traffic, road safety, congestion and the need for improved bus and rail services. The transport evidence base will inform the mitigation required for planned growth. The Council will work with Essex County Council, public transport operators, Network Rail and train operating companies to seek proportionate

			overstretched road network, making the proposals unrealistic without substantial transport improvements.		improvements to roads, public transport, rail services, station facilities and active travel connections where justified.
1161	13928	Dave Wendon [1161]	As the district plan notes infrastructure improvements need to come with the proposed developments but so many are needed ahead of it. Infrastructure needs to be in place ready for when the first properties are occupied. There is a preference to provide new homes in settlements with railway stations but there is a need for improved service with Clacton to London through services stopping at Alresford, Gt Bentley and Weeley, and provision of off-road car parking at the stations. So lets have the improved service before more houses are built.	Comment	Comments noted. The Council recognises the importance of aligning infrastructure delivery with the occupation of new homes. The Infrastructure Delivery Plan, transport evidence and site-specific Transport Assessments will inform the timing, phasing and funding of necessary improvements. The Council will continue to work with Essex County Council, Network Rail, train operating companies and bus operators to explore improved rail services, station access, parking and interchange facilities, with appropriate developer contributions secured where justified.

Policy CP2: Improving and Maintaining the Transport Network

Summary of Representations

Policy CP2 drew strong interest because it goes to the heart of how Tendring's growth will work in practice: whether new homes, jobs, ports, town centres and villages can be supported by a transport network that is safe, reliable and less car-dependent. Many respondents supported the policy's ambition to improve roads, public transport, active travel, rail access and links to key locations such as garden villages, Harwich International Port, Freeport East and railway stations. At the same time, there was a clear message that parts of the network are already under strain and that growth must be matched by realistic, funded and deliverable infrastructure. The main concerns centred on congestion, highway safety, rural road conditions, seasonal traffic, HGV movements, limited bus services, rail capacity and the timing of infrastructure delivery. Specific issues were raised on the A120, A133, A137, B1033 and routes serving Thorpe-le-Soken, Frinton, Walton, Brightlingsea, Weeley, Horsley Cross, Hare Green and Ardleigh. Respondents also highlighted the importance of Manningtree Station and crossing, possible rail improvements at Clacton/Gorse Lane and Weeley, freight and lorry parking near the A120/Harwich Port, and the need for Hare Green to be supported by a wider transport package rather than a single junction solution. Technical stakeholders emphasised the need for the Regulation 19 transport evidence to move from broad principles to a deliverable package of mitigation. Essex County Council called for a vision-led approach combining public transport, active travel, rapid transit, mobility hubs, freight, rail and phased delivery. National Highways sought proper consideration of strategic road impacts and lorry parking, while Suffolk County Council supported continued cross-boundary work on Manningtree Station, the A137 and the rail crossing/underpass.

The Council's response is that CP2 must be read alongside Policy CP1, which promotes walking, cycling, public transport and reduced car dependency. The Regulation 19 transport evidence, highway modelling and Infrastructure Delivery Plan will identify the transport measures needed to support planned growth, including highway improvements. The Council will continue to work with stakeholders and other infrastructure partners to secure proportionate and deliverable improvements. The Council recognises the strength of concern about congestion, road safety, limited public transport and the need for infrastructure to come forward at the right time. Site-specific and cumulative impacts will be tested through the evidence base, allocation policies, Transport Assessments and consultation with Essex County Council. Where necessary, mitigation will be secured. Policy CP2 already addresses freight and logistics by including criteria for dedicated lorry parking. More detailed matters, such as construction logistics, servicing plans, mobility hub design and Transport Assessment content, are better dealt with through planning applications and technical guidance rather than overly detailed Local Plan wording.

Policy CP3: Improving the Telecommunications Network

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
349	4317	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Comments made by health partners	Comment	Comments noted. Policy CP1, CP2 and CP3 supports active travel and reduced car dependency, which aligns with the Local Plan's wider health and wellbeing objectives and Policy HP1: Healthy Places. The Council will continue to work with health partners and infrastructure providers to ensure that new development supports healthier, accessible and well-connected places.
823	13558	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	CP3 – Improving the Telecommunications Network This is a strong position, with good clarification of requirements for gigabit-capable connectivity and infrastructure to support digital inclusion. The following additions are recommended to strengthen the position further: Digital Mobility Integration Add references requiring: • Mobility as a Service (MaaS) platforms • Real-time travel and traffic data systems • Digital booking for buses/DRT • Smart traffic management for safety and efficiency • Integration of mobility hubs into digital networks Street Design & Siting Clarify that new telecom infrastructure: • Must not compromise footway width or highway safety and Highway licencing/permit requirements • Must follow best-practice mast-sharing • Must integrate with Movement & Place streetscapes Remote Work & Demand Reduction Recommended addition - recognise that high-bandwidth connectivity supports reduced travel demand by enabling remote work,	Comment	The Council welcomes Essex County Council's support for the general direction of Policy CP3 and recognises that high-quality digital connectivity can support wider objectives including digital inclusion, remote working, digital healthcare, education and smarter travel choices. However, the Council considers that detailed requirements relating to mobility, such as service platforms, digital booking for buses or demand responsive transport, real-time travel data, smart traffic management and mobility hub digital integration are primarily transport planning and service delivery matters. These are more appropriately addressed through transport strategies and partnership working with Essex County Council and transport providers, rather than as detailed requirements within a telecommunications policy. The precise positioning and design of telecommunications equipment will be considered through the Council's placemaking, amenity and design policies, including Policies SPL3 and LP4, and relevant highway safety requirements; therefore, it is not necessary to duplicate these provisions within Policy CP3. The Council also notes that paragraphs 8.30–8.32 already recognise the role of improved digital connectivity in reducing the need to travel by enabling remote working, digital healthcare and hybrid education. No change to Policy CP3 is therefore considered necessary in response to this representation.

			digital healthcare, and hybrid education.		
Businesses, Landowners and Developers					
Community Representatives					
953	3531	Mr Community Campaigner David Barton [953]	Fine; discreet installation in remote locations should be criteria requirements.	Support	Noted.
Members of the Public					
1059	3730	Mr Matthew Sutton [1059]	Paragraph 8.32 frames the NHS Digital First approach as though it reduces the need for physical primary care provision. This is misleading. Digital First is an access mechanism, not a substitute for GP capacity. The Frinton area has a significant elderly population for whom digital healthcare access is not always realistic. The Council must add explicit wording making clear that Digital First supplements but does not replace the physical healthcare infrastructure obligations in Policy HP1.	Object	Comments noted. The Council agrees that digital healthcare should be understood as a supplement to, rather than a replacement for, physical healthcare infrastructure and services. Policy CP3 seeks to improve digital connectivity, while healthcare capacity and physical healthcare infrastructure are addressed through Policy HP1 and the wider Infrastructure Delivery Plan.
1106	re	Mr Jack Martin [1106]	This policy places additional cost and technical burdens on development that may undermine viability, particularly for smaller sites. The requirement for gigabit-capable broadband in all cases may not be realistic in more rural or hard-to-reach areas, potentially delaying delivery. The strict criteria for new infrastructure could also hinder improvements to network coverage where existing structures are unsuitable. Overall, the policy risks being overly rigid, limiting flexibility and slowing both housing delivery and essential telecommunications upgrades.	Object	Comments noted. The Council considers that access to high-quality digital connectivity is an important part of sustainable development and is consistent with national planning policy objectives to support advanced, high-quality and reliable communications infrastructure. The policy is intended to ensure that new development is planned with appropriate digital infrastructure from the outset, while recognising that delivery must remain proportionate and technically feasible. The Local Plan, including the requirements of Policy CP3, has been subject to viability assessment and the Council considers the policy to be justified and deliverable.
581	4152	Mrs Sally Webb [581]	sensible	Support	Noted.

Policy CP3: Improving the Telecommunications Network

Summary of Representations

Policy CP3 received limited comments, mainly supporting improved digital connectivity but raising issues around scope, viability, and the role of digital services. Some respondents suggested adding detailed digital mobility and smart transport requirements, while others highlighted concerns about rural delivery and ensuring digital healthcare does not replace physical provision.

The Council considers CP3 should remain focused on telecommunications infrastructure. Digital connectivity's wider benefits are recognised, but detailed transport-related systems are better addressed through transport strategies. The policy has been viability-tested and is considered deliverable, with flexibility for site constraints. Existing policies (SPL3, LP4) address siting and design and supporting text already covers reduced travel demand. The Council also recognises that digital healthcare should supplement, rather than replace, physical healthcare infrastructure and services, which are addressed through Policy HP1 and the wider Infrastructure Delivery Plan. The Council considers that no substantive changes are required.

CHAPTER 9: DELIVERING PLACES

Policy SAMU1: Development and delivery of Tendring Colchester Borders Garden Community

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3639	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	The SAMU1 allocation must secure a safe, continuous Multi-User Route linking Byway 36/21 east of Crockleford Heath with Byway 243 to the west, to connect two key PRoW corridors. With 7,500 homes proposed, inclusive off-road provision is essential to protect vulnerable users and provide safe, accessible movement for walkers, cyclists and horse riders. The creation of Salary Brook Country Park offers a strategic opportunity to deliver a perimeter MUR or bridleway, forming a coherent circular route while also functioning as a managed fire-break. Embedding these connections ensures a resilient, integrated and genuinely sustainable active-travel network.	Comment	The Council supports the principle of enhancing Public Rights of Way and recognises the importance of integrated multi-user routes within strategic developments. Policy requirements for green infrastructure, active travel, and connectivity already provide a robust framework for delivering such links through master-planning. Specific routing and design details will be secured at the planning application stage in consultation with Essex County Council.
349	4318	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	'We request that the policy is restructured to separate allocated uses from required infrastructure to be provided by the development. The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. Given its large scale, the ICB suggest the policy should say that: the development will deliver an on-site facility, unless a financial contribution towards off-site capacity improvements are agreed with the ICB. The ICB will continue to work with the TCBGC project team and developers to provide up to date information as part of the health strategy and site specific HIA. The ICB also recognises that there are opportunities to work with the university and other stakeholders in providing health services in the proposed leisure and sports park in line with the NHS 10-Year Plan.'	Comment	The policy framework allows for flexibility in delivery, including on-site provision or financial contributions where justified. Healthcare infrastructure requirements will be informed through ongoing discussions and secured through the planning application process and relevant infrastructure planning mechanisms.
6	13469	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water is committed to enabling sustainable growth and is collaborating with external stakeholders to find solutions to capacity challenges at our WRCs. We are also working to secure policy and regulatory change that allows water companies to better support growth, for example by allowing us to invest strategically to create new capacity ahead of growth materialising, and by changing charging rules to allow for developer contributions to new infrastructure.These align with the direction of travel in the recently published Government white paper, A New Vision for Water (January 2026). Successful delivery of the reforms set out in the white paper, as well are urgent action to manage the transition to the new regulatory system, is vital to securing the investment in infrastructure which is needed to support growth. Anglian Water is also working closely with Defra's Ministerial Water Delivery Taskforce, our regulators, and other key stakeholders to resolve ongoing challenges around growth in our region. We are also engaged in conversations regarding the delivery of Tendring and Colchester Borders Garden Community and	Comment	Policy requirements, alongside the Water Cycle Study and Infrastructure Delivery Plan, ensure that development will be appropriately phased and supported by necessary upgrades. Ongoing engagement with Anglian Water will inform delivery and phasing.

			capacity at Colchester WRC. Our approach to strategic sites should enable growth to come forward alongside a phased approach to infrastructure delivery to support the Garden Community. Anglian Water is aware that the planning application for the Garden Community has been submitted and will continue in dialogue with Colchester City Council and Tendring District Council through the determination period.		
1654	13499	Natural England (Jonathan Burt) [1654]	Policy SAMU1 should explicitly state the requirement to provide a minimum of 144ha of SANG across the site allocation, including the new Salary Brook Country Park, to mitigate the 'alone' impacts of recreational disturbance on the Essex Coast Habitats Sites.	Comment	The Council acknowledges Natural England's advice regarding SANGs provision. The final quantum of SANGs has been informed by the Habitats Regulations Assessment and appropriate mitigation strategy. Policy wording has been reviewed at Regulation 19 stage to ensure it reflects the necessary level of mitigation and is consistent with national policy and evidence.
823	13520	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Policy SP9 - C Should reference be made here to the sustainable skills centre that is proposed by Colchester Institute for the Tendring/Colchester Borders Garden Community.	Comment	Comment noted, policy SP9 is an existing adopted local plan policy that has been carried forward to the new local plan as a 'saved' policy from the current section 1 Local Plan.
148	14481	Environment Agency (Environment Agency) [148]	It should be noted that updates to the Flood Map for Planning resulting from the Environment Agency's NaFRA2 project in March 2025 have resulted in additional areas of Flood Zones 2 and 3 being identified within the boundaries of this site. We recommend that an updated SFRA is produced to reflect those changes, to inform a robust and sound Sequential Test to this Plan allocation and to influence the layout of built development within the Garden Suburb policy area so that it can avoid areas of the site identified as being at flood risk.	Comment	The Council accepts the need to update the SFRA to reflect the latest flood mapping and will ensure that the Sequential and Exception Tests are robustly applied. This has now been done ahead of the Regulation 19 consultation. Site layout and design will avoid areas of highest risk, in line with national policy.
808	14483	Ministry of Defence (Chris Waldron, DIO Assistant Safeguarding Manager) [808]	MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply (See attached document)	Comment	In response, the Council has ensured that, where necessary, the relevant policies include appropriate wording requiring development to consider and mitigate impacts on defence assets, in consultation with the MOD.
1403	4372	Bloor Homes Eastern [1403]	Policy SAMU2 deals with the strategic allocation of land for mixed use and residential on the northern edge of Clacton. The policy in principle is supported, but the wording which relies on the Supplementary Planning Document is objected to.	Object	Comment noted, representations in respect of SAMU2 will be dealt with in the relevant section below.
1462	4489	Latimer (Tendring Colchester Borders Garden Community) Developments Limited [1462]	Latimer welcomes draft Strategic Policy SAMU1 providing specific guidance on the TCBGC within the emerging TDC Local Plan. Notwithstanding, we make the below observations and requested changes to ensure consistency with the adopted version of the TCBGC DPD (May 2025).	Comment	The Council welcomes Latimer's support for Strategic Policy SAMU1 and its recognition that the policy provides continuity with the adopted Tendring Colchester Borders Garden Community Development Plan Document (DPD) and the saved Section 1 policies SP8 and SP9. The Council agrees that, as the adopted DPD is the primary and more detailed policy document for the Garden Community, it is appropriate that Strategic Policy SAMU1 remains broadly consistent with the wording and approach of the DPD whilst retaining its role as a concise summary policy within the Local Plan. The Council does not consider wholesale changes to the structure or content of the policy necessary.

					The following suggested amendments are considered reasonable and have been given favourable consideration in the Regulation 19 version of the Plan: Amending criterion (a) to refer to "education and health and wellbeing provision" rather than "education and early years and childcare", to better align with the wording used in the adopted DPD whilst still encompassing education-related facilities. Separating the text currently following criterion (i) into a standalone paragraph for improved clarity and readability. Minor amendments to the supporting text to improve precision and alignment with the adopted DPD, including the proposed changes to paragraph 9.6 relating to landscape-led design and green infrastructure. The Council notes the suggested amendment to criterion (h). This will be reviewed against the adopted DPD wording, however the current drafting already reflects the allocation of an 18-pitch Gypsy and Traveller site and no substantive policy difference is intended. The Council does not support the proposed amendment to the paragraph dealing with proposals that may prejudice the delivery or integrity of the Garden Community. The existing wording is intended to provide appropriate protection for the delivery of the allocation and reflects the fact that proposals both within and outside the Site Allocation Boundary may have the potential to prejudice its delivery. The Council considers the existing wording remains appropriate in this regard. With regard to the comments on differing plan periods and delivery figures between the Tendring and Colchester Local Plans, the Council acknowledges the point raised and will continue to liaise with Colchester City Council as both authorities progress their respective Local Plans. Any consequential updates to delivery assumptions or supporting text will be considered through the next stage of plan preparation. Overall, the Council welcomes Latimer's continued support for the Garden Community and will consider the proposed minor amendments aimed at improving consistency with the adopted DPD, whilst retaining the overall structure, purpose and content of Strategic Policy SAMU1.
853	5448	Taylor Wimpey [853]	As noted above, within CCC's draft Local Plan, TW's land interest forms part of a draft Site Allocation ('PP9 – North-East Colchester'). The draft Allocation extends to land outside of TW's land interest, and it is understood that a masterplan is being prepared to cover the entirety of the draft Allocation. The draft Allocation envisages the development of approximately 2,000 new dwellings, community infrastructure, and strategic open space. TW submitted	Comment	The Tendring Colchester Borders Garden Community is a strategically planned development area with its extent and policy framework established through the now adopted Development Plan Document (DPD). The Council considers that the latest allocation boundaries remain accurate, appropriate and that any future development proposals should

			Representations to CCC's Regulation 18 consultation in January 2026, through which they supported the inclusion of the Site within the draft Allocation, which supports their aspirations for residential development. It should be noted that TW set out in their CCC Representations that the Allocation should be extended to cover their entire land interest within the authority area (i.e. up to the border with TDC), in order to promote comprehensive development.		accord with the spatial strategy and policy framework established through the adopted DPD and associated masterplanning processes. Matters relating to the extent of allocations and land within Colchester City Council's administrative area are primarily for consideration through the preparation of Colchester City Council's Local Plan. No modification to Policy SAMU1 is considered necessary in response to this representation.
Community Representatives					
953	3532	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1712	14237	Bernard Jenkin [1712]	The proposed new standalone garden community settlements are reasonably small, but they are unlikely to be as financially viable as urban extensions. This is because the infrastructure for these developments will have to be built from scratch. Labour's eco towns failed, and the garden communities struggle in practice as we both know too well	Comment	Your comments regarding infrastructure and financial viability are noted. Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period
34	14267	Colchester Cycling Campaign (Mr William Bramhill, Secretary) [34]	Please do not underestimate the importance of Crockleford Hill Bromley Road, as an exit for cyclists to and from the east. It is currently dangerous. Can it be filtered so that the only motor car access is by residents, could it be made one-way for motor traffic to provide space for a cycle route? We would like to see the creation of a new cycle route from Salary Brook meeting Wivenhoe Road/Bromley Road through the new country park and garden community. This should join onto a new cycle route from Bromley Road, across the existing A120 farm track bridge, to meet Church Road at St Anne's and St Lawrence, continuing to Elmstead, and then south from Elmstead to Wivenhoe. For routes, see https://docs.google.com/document/d/1ce4FSgy46_GZckcRi2ycuC7P69qA7CakfP-elZyJNxE/edit?usp=sharing. (XB) Waterhouse Lane and Grange Road should receive a quiet lane designation to provide a safe route from the garden community to Manningtree. A safe connection is needed to the Beth Chatto gardens from New Elmstead.	Comment	The Council recognises the importance of safe and attractive walking and cycling connections to, from and through the Garden Community. Detailed consideration of potential cycle routes, connections to existing settlements, and any highway management measures on local roads will be addressed through the masterplanning process and the policies of the adopted Tendring Colchester Borders Garden Community DPD. The suggested routes and connections, including links towards Elmstead, Wivenhoe, Manningtree and Beth Chatto Gardens, are noted and can be considered as part of future detailed design work and transport planning.

1175	14434	ONTRACK Tendring Transport Users (John Smock) [1175]	While a rapid transit bus service into Colchester is proposed, it is inevitable that this development will also result in additional travel to Colchester North station, adding to the congestion in that area. However, the site of Ardleigh station is only one mile away and thus if reopened could provide a convenient alternative.	Comment	Policy SAMU1 establishes the strategic framework for the Garden Community, including provision for Rapid Transit and sustainable transport measures, with more detailed transport requirements contained within the adopted Tendring Colchester Borders Garden Community DPD. The Council acknowledges the observation regarding the former Ardleigh Station site; however, the reopening of a railway station is a matter that falls beyond the scope of this Local Plan allocation and would require separate consideration by the relevant rail and transport authorities. The Local Plan seeks to support sustainable travel opportunities while recognising that transport infrastructure proposals will be subject to ongoing review and wider strategic transport planning.
Members of the Public					
1352	4078	Mrs Paula Bland [1352]	All the facilities must be in place to serve the housing as it is built and not attempting to add them afterwards.	Comment	The delivery of the Tendring Colchester Borders Garden Community will be guided by the adopted Development Plan Document (DPD), which includes detailed policies on infrastructure provision, phasing and delivery. In addition, the Infrastructure Delivery Plan (IDP) identifies the key infrastructure required to support growth and helps inform the timing of its provision. Development will be brought forward through a comprehensive masterplanning process and planning applications will be expected to demonstrate how the necessary infrastructure, community facilities and services will be delivered in step with housing growth. The Council is therefore satisfied that the policy framework provides appropriate mechanisms to ensure infrastructure delivery is aligned with the phased development of the Garden Community.
969	4429	Mr Scott Gilmour [969]	TCBGC is an exciting example of how future developments can be designed. Accommodating a range of housing stock, proximity to shops and businesses, integrating multiple modes of transport and reserving ample space for nature etc. I hope existing developments can be retrofitted to reflect its design approach.	Support	This is noted and the support is welcomed.
1161	13926	Dave Wendon [1161]	Infrastructure improvements need to come with the proposed developments but so many are needed ahead of it. It is essential that the full A133/A120 link road, known also as A1331, is completed prior to any planning application for these new sites is approved. 1000 new homes and the additional already approved developments are going to add to congestion on Clingo Hill. I eagerly await the opening of the A1331. Local people are the best ones to tell you of pinch points in their area and one is the School Road, A133 and Church Road crossroads in Elmstead Market. This has been crying out for traffic lights or a mini roundabout for years. S106 monies for health don't overcome the lack of doctors in the Wivenhoe and Brightlingsea surgeries.	Comment	The Council acknowledges concerns regarding infrastructure improvements. The Infrastructure Development Plan, which is a key part of the evidence in support of this local plan sets out the needs for services, and the Transport Assessment sets out the requirements for road improvements. The DPD for the TCBGC which has now been adopted has secured a requirement for an infrastructure delivery strategy and phasing plan that sets out how and when infrastructure, services and facilities will be provided.
974	14194	Mr Malcolm Easton [974]	Looking at the incomplete plans and aspirations for the Elmstead Garden Village it is, as usual, clear that no councillor lives, or wants to live, anywhere near. This is not unusual. I said to Pritti Patel that her government and now the Labour government did not want to build "Homes" but used the word "Houses" - as this	Comment	The Council acknowledges concerns regarding SAMU1. The Council reiterates that the increase in housing outlined in the Local Plan is a result of mandatory Government Housing Targets. Although the Council views these targets as over ambitious, it is important a Local Plan is

			seemed to have some magic connotation relating to actual dwellings and less disingenuous. It worked, because ever since (in opposition admittedly) that party has stove to point out that in the past, be it council house building or private building, planners had it in mind and as a duty, to provide "HOMES" that people cherished, cared for, and generations of their family desired to put down roots for the sake of the Community. Even a council estate would have a proper school/play school with playground; a row of shops to help people without cars and save building roads; open spaces and doctors for their mental health: all striving to make a Community or a Village of the future. Your plans are Pie in the Sky and clearly brokered by Building Companies, Hangers-on, and a desire to make others make sacrifices, so this doesn't happen in a Councilors back garden or hurt a Builders profit margin. Shameful. I hope they can all look themselves in the mirror or sleep at night.		written which meets national planning guidance so that the District is not vulnerable to speculative development.

Policy SAMU1: Development and delivery of Tendring Colchester Borders Garden Community

Summary of Representations

Representations on SAMU1 were generally supportive of the principle of the Tendring Colchester Borders Garden Community and the policy's role in reflecting the adopted DPD. Comments focused on active travel connectivity, healthcare provision, water and wastewater infrastructure, green infrastructure and SANGs provision, flood risk, safeguarding matters, infrastructure delivery and phasing, transport connections, viability, and ensuring consistency with the adopted DPD. The majority of respondents sought clarification, refinement or minor amendments rather than fundamental changes to the allocation. The Council concluded that the adopted DPD, masterplanning process, Infrastructure Delivery Plan and future planning application process provide the appropriate mechanisms for addressing many of the detailed matters raised.

With this in mind, policy SAMU1 and its supporting text have been reviewed to ensure continued consistency with the adopted TCBGC DPD, the updated evidence base documents, and other relevant strategic infrastructure requirements. Criterion (a) was amended to refer to "education and health and wellbeing provision" to better align with the wording of the adopted Tendring Colchester Borders Garden Community DPD. The text following criterion (i) relating to proposals within the Site Allocation Boundary being determined in accordance with the DPD was separated into a standalone paragraph to improve clarity and readability. Minor amendments were also made to the supporting text to improve precision and consistency with the adopted DPD, including wording relating to landscape-led design and green infrastructure. Separate to the policy itself, the supporting evidence base was updated to reflect the latest flood risk information and other technical evidence where necessary to support the allocation and its delivery.

Policy SAMU2: Development at Harley Gardens, Clacton

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3640	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	A comprehensive approach to SAMU2 must include the protection, enhancement and extension of existing Public Rights of Way, with safe, continuous Multi-User Routes integrated into the masterplan. SAMU2 explicitly requires bridleway infrastructure enhancements, providing a clear mandate to deliver inclusive, segregated routes for walkers, cyclists and horse riders. With 1,700 homes proposed, it is essential to avoid severance and ensure vulnerable users have safe, off-road access across the site and into the wider network. Green corridors such as Pickers Ditch and Hartley Brook should be designed as multifunctional MURs, forming a connected, resilient and accessible active-travel network.	Comment	The Council supports the integration of inclusive and multifunctional green infrastructure. Existing policy requirements for green corridors and active travel networks are considered sufficient to secure these outcomes through the masterplanning process.
349	4319	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	'The ICB requests that the policy is restructured to separate allocated uses from required infrastructure to be provided by the development. Infrastructure requirements should include financial contributions towards increased healthcare capacity. The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. Clacton has a thriving community hospital which has seen new services integrated as well as more capacity being provided. The ICB might look to incorporate some health services into a new multiuse community hub, but at the moment the neighbourhood health strategy is still to be determined.	Comment	The Council acknowledges the need for healthcare provision and will continue to work with the ICB to ensure appropriate mitigation is secured in lockstep with this large scale development and the sequential completion of relevant phases. The policy and now adopted SPD allow flexibility to respond to evolving healthcare models. In particular, the SPD sets out a comprehensive and co-ordinated approach that identifies the land use, design, environmental and infrastructure requirements for the site and will be used to inform, assess and determine planning applications and co-ordinate a comprehensive, integrated and sustainable development and a high-quality well-designed place.
6	13470	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water has responded to the consultation on the supplementary planning document (SPD) for Hartley Gardens and we support the comprehensive masterplan approach required by the policy to support this. Our response indicated that is currently no capacity to accommodate wastewater flows from new growth at Clacton-Holland Haven WRC. However, a named growth scheme has been identified in our PR24 Business Plan for Clacton-Holland Haven WRC for delivery in AMP8 (2025-2030). Currently, Anglian Water is recommending a Grampian condition is attached to any planning consent for new development, to ensure that the development is not occupied until the growth scheme has been delivered, to prevent environmental harm. Due consideration should be given to the time	Support	The Council recognises the identified capacity constraints and supports a phased approach to delivery, including infrastructure delivery. The now adopted SPD sets out a comprehensive and co-ordinated approach that identifies the land use, design, environmental and infrastructure requirements for the site and will be used to inform, assess and determine planning applications and co-ordinate a comprehensive, integrated and sustainable development and a high-quality well-designed place. Moreover, appropriate planning conditions and infrastructure requirements will ensure development is aligned with network upgrades.

			required for the submission and determination of outline planning application, discharge of conditions, and subsequent reserved matters consents to be obtained before construction can commence. During this time the growth scheme for the WRC will be progressed to delivery. Once delivered the growth scheme infrastructure will need to be commissioned and the necessary updated discharge permit in place, before development on site is occupied. Jaywick WRC has limited capacity and would not be able to accommodate the full quantum of growth proposed for the Site, without a future growth scheme being planned for, in subsequent Asset Management Periods (AMPs). Whilst there may be potential for parts of the site to connect to the Jaywick network and WRC, specific advice would need to be obtained through the submission of a pre-planning enquiry (PPE) to obtain a detailed desktop assessment, for foul drainage connections. This will utilise our approach to strategic sites, to enable growth to be phased appropriately. The PPE will identify whether there are sustainable points of connection (SPoC) into our network by using a complexity matrix that presents a number of factors for assessment including pollution risks and storm overflow spills, surcharges of our network, existing flood potential and excess surface water flooding. Our engineers will identify a sustainable point of connection to our network (or sustainable points of connection depending on phasing) to avoid these constraints. Anglian Water supports the policy requirement for the provision of sufficient utility infrastructure which is consistent with Policy PPL5. We also welcome the principles for inclusion in the SPD that include a sustainable drainage system across the site, and the need to demonstrate how a phased approach to development can deliver the required infrastructure.		
1654	13500	Natural England (Jonathan Burt) [1654]	Policy SAMU2 should be updated to require a minimum of 32.64ha of SANG. Please note that the site allocation may also be Functionally Linked Land, and a desk study and wintering bird surveys, including nocturnal surveys, will be required to rule this out or to inform mitigation requirements.	Comment	The Council accepts the need for mitigation and ecological assessment. Policy and supporting evidence will ensure compliance with Habitats Regulations, with detailed requirements secured at application stage.
823	13561	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Hartley Gardens: Disagree Whilst the allocation of 2.18ha of suitable land for education and childcare use is strongly supported, specific reference to a two form entry school should be omitted. The number of places at any new school is a matter for the Office of the Schools Adjudicator, acting on behalf of the Secretary of State. Any policy stipulating the school size could be interpreted as ultra vires and prejudicial to statutory process.	Comment	The Council agrees that specifying school size within policy may not be appropriate. The policy has been reviewed and updated the policy to ensure it provides sufficient flexibility while safeguarding land for education provision.

			The area for the stand-alone EY&C facility is incorrect (0.13ha not 1.3ha but note new ECC Developers' Guide to Infrastructure Contributions increases early years and childcare (EY&C) requirements). The EY&C financial contribution has been missed (see comment against para 2.7).		
48	14368	Essex Police [48]	Chapter 9 – Delivering Places Strategic Policy SAMU2: Development at Hartley Gardens, Clacton At Criterion d. after 'health' insert "police, fire & rescue & ambulance"	Object	The Council accepts that community infrastructure should include emergency services. Policy wording has been reviewed and updated to ensure clarity and consistency with infrastructure delivery mechanisms.
Businesses, Landowners and Developers					
853	13659	Taylor Wimpey [853]	Despite being allocated in the current adopted Local Plan (within 'Section 2' which was adopted in 2022), no planning applications have come forward for the development of the Site. Although the adopted Local Plan assumed delivery would not commence until years 2025 – 2030, it is assumed this was based on the assumption that planning applications would come forward prior to this to facilitate delivery. As this has not progressed, programme for delivery much adjust accordingly. The SHLAA confirms that there are various landowners within the boundary of the allocation, which potentially means conflicting ambitions / timescales. It is understood that an SPD is anticipated to be adopted in 2026, however it is not currently known to what extent landowners have input into this / it reflects aspirations for individual parcels of land, or whether landowners have been developing planning applications in tandem with the forthcoming SPD. Discrepancies between the SPD and landowners aspirations, or the imposition of requirements which landowners were not previously aware of, has the potential to cause significant delays.	Comment	The Council acknowledges potential complexity but considers that the SPD-led approach is essential to ensuring comprehensive and coordinated development. Landownership issues are not uncommon in strategic sites and can be addressed through the planning process
Community Representatives					
953	3533	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1712	14238	Bernard Jenkin [1712]	The proposed new standalone garden community settlements are reasonably small, but they are unlikely to be as financially viable as urban extensions. This is because the infrastructure for these developments will have to be built from scratch. Labour's eco towns failed, and the garden communities struggle in practice as we both know too well.	Comment	The development at Hartley Gardens is an established strategic allocation supported by an adopted SPD, including comprehensive evidence base and detailed infrastructure planning. The delivery of infrastructure, housing, employment and community facilities has been considered through the plan-making process, including viability assessment and Infrastructure Delivery Plan work. The Council is satisfied that the allocation is capable of being delivered in a phased and coordinated manner and remains a key component of the District's strategy for meeting housing, employment and infrastructure needs in a sustainable

					way. No modification to Policy SAMU2 is considered necessary in response to this representation.
Members of the Public					

Policy SAMU2: Development at Harley Gardens, Clacton

Summary of Representations

Representations on SAMU2 generally supported the principle of comprehensive development at Hartley Gardens but raised issues relating to active travel and Public Rights of Way, healthcare provision, wastewater and utility infrastructure capacity, ecological mitigation and SANG provision, education requirements, emergency services infrastructure, delivery and phasing, and overall viability. Stakeholders broadly supported the masterplan/SPD-led approach and the need for coordinated infrastructure delivery. The Council concluded that many detailed matters are appropriately addressed through the now adopted SPD, supporting evidence base, infrastructure planning and future planning application process, but accepted the need for limited refinements to improve flexibility and clarity in relation to education and community infrastructure requirements.

In response to representations, supporting text and policy wording were reviewed to ensure consistency with the now adopted Hartley Gardens SPD and its comprehensive masterplanning approach. The policy was amended to remove prescriptive references to the size of any new school, ensuring flexibility and avoiding prejudice to the statutory education planning process. Education-related wording was updated to safeguard land for education provision whilst allowing the precise form and scale of facilities to be determined through the appropriate statutory processes. Community infrastructure wording was also reviewed and refined to better reflect the role of emergency services infrastructure alongside other community facilities. The supporting evidence and policy framework were updated, where necessary, to ensure appropriate consideration of ecological mitigation requirements, infrastructure delivery and utility capacity constraints. However, no further changes were made in response to comments relating to active travel, healthcare delivery models, landownership matters, viability or development phasing, as these matters were considered to be adequately addressed through the adopted SPD, Infrastructure Delivery Plan and development management process.

Policy SAMU3: Development at Oakwood Park, Clacton

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3641	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	The SAMU3 allocation contains Bridleway 24, which runs through the centre of the site and must be protected, enhanced and integrated as the spine of a safe, continuous Multi-User Route. With 900 homes proposed, traffic growth makes segregated off-road access essential for walkers, cyclists and horse riders. The masterplan, should it go ahead, must also deliver an inclusive circular MUR around the entire development, using green-infrastructure corridors and the watercourse to create a resilient, connected network. This prevents severance, safeguards vulnerable users and retains the bridleway's rural character while providing comprehensive, accessible active-travel routes.	Object	The Council supports the protection and enhancement of PRoW networks. Policy requirements and masterplanning will ensure safe and integrated active travel routes are delivered.
349	4322	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	'The ICB requeststhat the policy is restructured to separate allocated uses from required infrastructure to be provided by the development. Infrastructure requirements should include financial contributions towards increased healthcare capacity. The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. The ICB would like the stakeholder in this policy changed to reflect the change from a CCG to an ICB. So, it would suggest the following 36 amendment: "… as required by the NHS/ ICB CCG …" Clacton has a thriving community hospital which has seen new services integrated as well as more capacity being provided. The ICB might look to incorporate some health services into a new multiuse community hub, but at the moment the neighbourhood health strategy is still to be determined. With regard to the allocation including "approximately 1.0 hectares of land for health care facilities", it should be noted that the most appropriate means of addressing the healthcare requirements for this proposed development has not yet been determined by the various health partners of the ICB. As such, flexibility needs to be built in to the policy to allow for mitigation to be secured either through direct provision of land or floorspace, or via a development contribution (to be expended on healthcare infrastructure projects to be identified in accordance with ESNEFT's and the ICB's Clinical and Estate Strategies and the Ten Year Plan).	Comment	The Council notes the ICB's comments and agreed that flexibility should be retained within the policy to allow healthcare needs arising from the development to be addressed through the most appropriate mechanism as healthcare models and service delivery requirements evolve over time. The Council recognised that, at this stage, the most appropriate form of healthcare mitigation has not been definitively established and that future requirements may comprise on-site provision, the delivery of floorspace within a wider community facility, enhancements to existing healthcare infrastructure, financial contributions, or a combination of these measures. The Council therefore agreed that the policy should provide sufficient flexibility to respond to the evolving needs of the NHS and the Integrated Care Board. The Council also agreed that references to the former Clinical Commissioning Group (CCG) should be updated to refer to the Integrated Care Board (ICB) to reflect current governance arrangements, the wording has been updated. Accordingly, the Council supported amendments to the policy wording to remove unnecessary prescription regarding the delivery of a specific quantum of healthcare land and instead enable healthcare infrastructure needs to be met through either direct provision and/or financial contributions, as appropriate and as agreed with the NHS and ICB based on evidenced need. This approach was considered consistent with national planning policy and would ensure that healthcare mitigation can be secured in the most effective and sustainable manner throughout the lifetime of the allocation.

			In light of the above, to manage expectations with regard to new healthcare floorspace provision, it is requested that items f) of the policy is removed. It is also requested that item p) of the policy is amended as follows – "… as required by the NHS/ ICB CCG …" to ensure that the correct stakeholder is referenced. '		
6	13471	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	It is noted that a further 900 homes are proposed as an extended mixed-use development. The plan must be read as a whole and therefore policies, including new Strategic Policy PPL5 Water Conservation, Drainage and Sewerage, will apply. As indicated in our response to SAMU2, there is currently no capacity to accommodate wastewater flows from new growth at Clacton Holland Haven WRC. However, a named growth scheme has been identified in our PR24 Business Plan for Clacton-Holland Haven WRC for delivery in AMP8 (2025-2030). Currently, Anglian Water is recommending a Grampian condition is attached to any planning consent for new development, to ensure that the development is not occupied until the growth scheme has been delivered, to prevent environmental harm. Due consideration should be given to the time required for the submission and determination of outline planning application, discharge of conditions, and subsequent reserved matters consents to be obtained before construction can commence. During this time the growth scheme for the WRC will be progressed to delivery. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately, once a PPE is submitted by the developer. We support the policy requirement for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site.	Comment	The Council agreed that development should be appropriately phased alongside the delivery of the necessary wastewater infrastructure and upgrades to the Clacton-Holland Haven Water Recycling Centre and associated network. The Council considered that criterion (o) already provides an appropriate policy basis for securing early engagement with Anglian Water and the preparation of a water and drainage strategy. The detailed timing, phasing and delivery of wastewater infrastructure, including any necessary planning conditions, will be addressed through the planning application process in consultation with Anglian Water and other relevant stakeholders. Accordingly, no substantive amendment to the policy wording was considered necessary, although supporting text and evidence base documents will continue to reflect the importance of infrastructure phasing and utility capacity in the delivery of the allocation.
1654	13501	Natural England (Jonathan Burt) [1654]	Should be updated to require a minimum of 17.28ha of SANG.	Comment	The Council accepts the need for appropriate mitigation. SANGs provision has been informed by the Habitats Regulations Assessment, the latest guidance from Natural England and reflected in up to date policy. Moreover, the precise final SANGs provision will be informed by multiple factors including detailed design and layout which are matters for the Development Management process.
823	13564	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Whilst the allocation of 2.1ha of suitable land for education and childcare use is strongly supported, specific reference to a two form entry school should be omitted. The number of places at any new school is a matter for the Office of the Schools Adjudicator, acting on behalf of the Secretary of State. Any policy stipulating the school size could be interpreted as ultra vires and prejudicial to statutory process.	Comment	The Council agrees and has updated the policy wording to ensure flexibility in education provision similar to the changes to SAMU2.
48	14365	Essex Police [48]	Strategic Policy SAMU3: Development at Oakwood Park, Clacton At Criterion p. after 'health' insert "police, fire & rescue & ambulance" and after 'NHS/CCG' insert "police, fire & rescue and ambulance services"	Object	The Council accepts the principle and will review the policy wording to ensure emergency services infrastructure is appropriately referenced.

			Updated paragraph to read; “p. financial contributions towards community facilities such as health, police, fire & rescue and ambulance provision as required by the NHS/CCG, police, fire & rescue and ambulance services, either through the Community Infrastructure Levy or Section 106 Planning Obligations.”		
Businesses, Landowners and Developers					
853	13660	Taylor Wimpey [853]	It is not clear how close this application is to a decision. Furthermore, any S106 Obligations requiring the provision of infrastructure / community facilities to come forward in advance of a certain proportion of dwellings has the ability to delay the delivery of housing.	Comment	The Council does not agree that infrastructure requirements should be weakened. Phasing mechanisms are necessary to ensure sustainable development and will be applied proportionately through the planning process.
Community Representatives					
953	3534	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
969	4447	Mr Scott Gilmour [969]	Suggestion to investigate the addition of a train station (potentially on Burrs Road) to support the development and provide connections to the industrial estate and even Holland. It would also allow grade separation of the current railway level crossing.	Comment	The Council notes the suggestion; however, no evidence currently supports the viability or need for a new station at this location. Transport strategy will continue to focus on deliverable and evidence-based interventions.

Policy SAMU3: Development at Oakwood Park, Clacton

Summary of Representations

Representations on SAMU3 focused on the provision and delivery of healthcare infrastructure, education provision, wastewater and utility infrastructure capacity, ecological mitigation, Public Rights of Way and active travel connectivity, emergency services infrastructure, and development phasing. Respondents generally supported the principle of the allocation but sought greater flexibility in how community infrastructure is delivered and requested updates to reflect current governance arrangements, delivery models and statutory processes. The Council concluded that the allocation remains appropriate and deliverable, with many detailed matters to be addressed through the planning application process and infrastructure planning, whilst accepting a limited number of amendments to improve flexibility, consistency and clarity.

In response to the representations submitted, several changes have been made to policy SAMU3 and its supporting text. The policy was amended to remove unnecessary prescription regarding the provision of a specific quantum of land for healthcare facilities, allowing healthcare needs to be met through on-site provision, financial contributions or a combination of measures, based on evidenced need and agreement with the NHS and Integrated Care Board (ICB). References to the former Clinical Commissioning Group (CCG) were updated to refer to the Integrated Care Board (ICB) to reflect current healthcare governance arrangements. The policy wording relating to healthcare infrastructure was also revised to provide greater flexibility in responding to evolving healthcare delivery models and service requirements. Regarding education, the education provision requirements were amended to remove references to a specific two-form entry primary school, allowing the precise scale and form of education provision to be determined through the appropriate statutory processes and at the appropriate time, whilst continuing to safeguard land for education use. The policy wording was reviewed to ensure that emergency services infrastructure can be appropriately considered alongside other community infrastructure requirements. Supporting text and evidence base documents were updated, where necessary, to reflect the importance of phasing development alongside wastewater infrastructure upgrades and utility capacity improvements. However, no further changes were made in response to comments relating to active travel routes, railway infrastructure, development phasing or infrastructure triggers, as these matters were considered capable of being addressed through the masterplanning, infrastructure delivery and development management processes.

Policy SAMU4: Development at Rouses Farm, Jaywick Lane, Clacton

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3642	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	The SAMU4 allocation lies immediately east of a well-established Public Rights of Way network, including Footpaths 2 and 3, which provide important local access. To avoid severance and ensure safe, inclusive movement for walkers, cyclists and horse riders, these footpaths should be upgraded to Multi-User Route standard and directly connected into a continuous circular MUR around the entire development. With 350 homes proposed, increased traffic will heighten risks for vulnerable users unless segregated off-road routes are secured. Integrating a circular MUR through green-infrastructure corridors will create a resilient, accessible and connected active-travel network.	Comment	The Council supports improved connectivity and active travel provision. Existing policy requirements are considered sufficient to secure this through detailed design.
349	4323	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met. ESNEFT wishes to clarify the requirement for this policy as outline consent for this development was granted in January 2024 (ref: 17/01229/OUT) and the required healthcare mitigation was secured in the associated Section 106 Agreement, dated December 2023.	Comment	The Council notes that healthcare mitigation has been secured through the extant planning permission. No further policy change is required.
6	13472	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	This site is proposed for up to 950 homes and associated community facilities. It is noted that the site has planning consent. The site is adjacent to Jaywick WRC catchment. As indicated for SAMU2. Jaywick WRC has limited capacity and would not be able to accommodate the full quantum of growth proposed for the SAMU4 (and potentially phases of SAMU2), without a future growth scheme being planned for, in subsequent Asset Management Periods (AMPs). Whilst there may be potential for later phases of the site to connect to the Jaywick network and WRC, specific advice would need to be obtained through the submission of a pre-planning enquiry (PPE) to obtain a detailed desktop assessment, for foul drainage connections. This will utilise our approach to strategic sites, to enable growth to be phased appropriately – including for connections into the network. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately, once a PPE is submitted by the developer. The PPE will identify whether there are sustainable points of connection (SPoC) into our network by using a complexity matrix that presents several factors for assessment including pollution	Comment	The Council acknowledges capacity constraints and will ensure development is phased appropriately and aligned with infrastructure upgrades.

			risks and storm overflow spills, surcharges of our network, existing flood potential and excess surface water flooding. Our engineers will identify a sustainable point of connection to our network (or sustainable points of connection depending on phasing) to avoid these constraints. We support the policy requirement for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site.		
1654	13502	Natural England (Jonathan Burt) [1654]	The policy should be updated to require a minimum of 18.24ha of SANG. Please note that the site allocation may also be Functionally Linked Land	Comment	The Council accepts the need for appropriate habitat mitigation in accordance with the Habitats Regulations and associated evidence. However, the precise quantity and configuration of Suitable Accessible Natural Greenspace (SANG) required for this allocation must be considered in the context of the Habitats Regulations Assessment, the latest Natural England guidance and the overall mitigation strategy for the development. The Council notes that, for this allocation, detailed planning approvals have already been granted for the early phases of development, including approved layouts, open space provision and green infrastructure arrangements. As such, the scope for altering the amount and distribution of open space within those approved phases is necessarily constrained. The final approach to SANG provision and any additional mitigation requirements will therefore need to take account of these existing approvals alongside the requirements of future phases and any updated evidence. Accordingly, the Council does not consider it appropriate to prescribe a specific quantum of SANG within the policy. The necessary mitigation will instead be informed through the Habitats Regulations Assessment process and secured through the detailed planning and development management process, having regard to the approved phases of development, current evidence, up to date policy, the advice of Natural England and other relevant material planning considerations.
823	13565	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Disagree b: Whilst the allocation of 2.1ha of suitable land for education and childcare use is strongly supported, specific reference to a two form entry school should be omitted. The number of places at any new school is a matter for the Office of the Schools Adjudicator, acting on behalf of the Secretary of State. Any policy stipulating the school size could be interpreted as ultra vires and prejudicial to statutory	Comment	The Council agrees that a degree of flexibility is appropriate and will review the policy wording accordingly. However, it should be noted that the development already benefits from planning permission and a completed Section 106 Agreement which secures both education land and education contributions. The Council therefore considers it important that the Local Plan policy remains consistent with the education infrastructure requirements

			process. J: Provision of a safe cycle-path / footway to Clacton Coastal Academy (now Lift Clacton) is strongly supported. k: Reference to a financial contribution towards primary education is missing (see comment against para 2.7).		and delivery mechanisms that have already been established through the extant permission and associated legal agreement. Any amendments to the policy should therefore provide appropriate flexibility whilst maintaining alignment with the education provision and contributions already secured.
48	14366	Essex Police [48]	Strategic Policy SAMU4: Development at Rouses Farm Jaywick Lane, Clacton At Criterion d. after 'healthcare' insert "police, fire & rescue and ambulance"	Object	Comment noted. The Council has reviewed the policy wording and will make amendments where deemed necessary.
Businesses, Landowners and Developers					
853	13661	Taylor Wimpey [853]	Outline consent granted in 2024 for 950 dwellings, and pre-application consultation has taken place in respect of RMA proposals. No comment.	Comment	Noted. No modification proposed.
441	14272	Richborough [441]	Our representation is broadly supportive of Policy SAMU4 and the allocation at Rouses Farm, noting that it has extant outline permission and delivery is underway. It highlights SAMU4 as an appropriate and sustainable extension to Clacton, providing homes, a neighbourhood centre, healthcare, and a primary school. The document argues that the adjacent land south of St John's Road should be allocated alongside SAMU4, allowing the two sites to function as a single, coherent new community and maximise infrastructure and sustainability benefits.	Comment	Noted.
Community Representatives					
953	3535	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	The representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					

Policy SAMU4: Development at Rouses Farm, Jaywick Lane, Clacton

Summary of Representations

Representations on SAMU4 generally supported the principle of the allocation and acknowledged that the site benefits from an extant outline planning permission and agreed infrastructure package. Comments focused on healthcare provision, education infrastructure, habitat mitigation and SANG requirements, wastewater capacity and infrastructure phasing, emergency services infrastructure, and active travel connections. Several respondents sought greater flexibility around the form of infrastructure delivery and updates to reflect current statutory processes and governance arrangements. The Council concluded that many of the matters raised have already been addressed through the extant planning permission, approved phased development framework and associated Section 106 Agreement. Consequently, only limited amendments were considered necessary to improve clarity, flexibility and consistency with the approved scheme.

With these representations in mind, the Council has made changes to Policy SAMU4 and its supporting text. The education wording was reviewed to provide appropriate flexibility in relation to the form and scale of education provision whilst remaining consistent with the education land and financial contributions already secured through the extant planning permission and completed Section 106 Agreement. Community infrastructure wording was also reviewed and

amended where appropriate to better reflect the potential role of emergency services infrastructure alongside healthcare and other community facilities. The supporting text and associated evidence were updated, where necessary, to reflect the importance of phasing development alongside wastewater infrastructure upgrades and utility capacity improvements. No specific SANG requirement was added to the policy. Instead, habitat mitigation requirements continued to be informed through the Habitats Regulations Assessment process, approved phases of development, up-to-date evidence, Natural England guidance and the development management process. Similarly, no further changes were made in response to comments relating to Public Rights of Way enhancements, active travel routes or healthcare mitigation, as these matters were considered to be adequately addressed through the existing planning permission, current and any future reserved matters approval(s), legal agreements and other development management processes.

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

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3643	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	Bridleway 36 runs along the western edge of the SAMU5 allocation, and development must not sever or compromise access to this important route. With 300 homes proposed, increased traffic will heighten risks for vulnerable users unless safe, segregated off-road provision is secured. The masterplan should deliver a continuous circular Multi-User Route around the entire site, ensuring inclusive access for walkers, cyclists and equestrians. This circular MUR must also connect and, where feasible, upgrade the many footpaths bordering the site, maintaining safe access to Bridleway 36 and creating a resilient, coherent and accessible active-travel network.	Comment	The alignment of Bridleway 36 along the western edge of the site is recognised as an important asset for sustainable and recreational movement. Policy SAMU5 already requires a comprehensive, landscape-led masterplan and delivery of green infrastructure. However the Council also agrees that safe and inclusive access for walkers, cyclists and equestrians is essential for a development of this scale. Having considered the location of Bridleway 36 further and in light of the comments here, the policy has been refined to explicitly support retention and enhancement of Bridleway 36 and to require the provision of a connected network of multi-user routes, including where appropriate a circular route integrated with surrounding Public Rights of Way. Detailed design, including segregation from vehicular traffic where necessary, will be secured through masterplanning and subsequent planning applications. This approach is considered justified and effective, ensuring compliance with NPPF objectives on active travel and healthy communities.
791	3716	Sport England (Mr Roy Warren, Planning Manager) [791]	A site of approximately 1,650 dwellings is one of the largest allocations in the plan and should make on-site provision for sports facilities. The additional demand associated with the scale of this development will be difficult to be met by improving the capacity of nearby facilities in the local area. The 50 hectares of strategic open space proposed would offer the opportunity for outdoor sports facility needs to be included as part of this provision. An additional policy requirement is therefore requested which requires outdoor and indoor sport and leisure provision to be provided on-site.	Comment	The Council notes Sport England's support in principle and agrees that a development of this scale should contribute appropriately to sport and leisure provision. Policy SAMU5 already requires significant green infrastructure which provides flexibility to accommodate outdoor sports facilities where justified. The Council considers that a criteria-based policy approach, supported by the Infrastructure Delivery Plan (IDP) and subsequent evidence (e.g. playing pitch strategies), is the most appropriate and effective mechanism to ensure provision reflects identified need. The policy has been strengthened to clarify that on-site provision of sport and leisure facilities (both indoor and outdoor where viable) will be required where evidence demonstrates need arising directly from the development, with off-site contributions secured where appropriate. This ensures compliance with paragraph 98 of the NPPF and the tests for planning obligations.
6	13473	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning	This SAMU makes provision for approximately 1,650 homes. The site is extensive and includes Anglian Water surface water sewers, surface water discharge points, and rising mains (pressurised sewers) through the site. It is therefore important that an appropriate policy clause is included in Policy PPL5 to ensure appropriate protection measures are undertaken to safeguard our assets for future maintenance. These assets should be incorporated within public	Comment	The presence of existing water infrastructure within the site is acknowledged and will be addressed through masterplanning and design. Policy SAMU5 and supporting policies already require early engagement with infrastructure providers. The Council agrees to strengthen supporting text (and where necessary policy wording) to explicitly require the protection and safeguarding of existing sewer infrastructure, integration of assets within open space or highway corridors, and the early preparation

		Advisor – Sustainable Growth) [6]	open space or highways, and therefore the requirement for at least 50ha of strategic open space, provides an opportunity for a design layout to avoid build over of our assets (including permeable paving/SuDS). This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately (including connections into the network), once a PPE is submitted by the developer. The PPE will identify whether there are sustainable points of connection (SPoC) into our network by using a complexity matrix that presents several factors for assessment including pollution risks and storm overflow spills, surcharges of our network, existing flood potential and excess surface water flooding. Our engineers will identify a sustainable point of connection to our network (or sustainable points of connection depending on phasing) to avoid these constraints. We support the policy requirement for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site.		of a foul drainage strategy informed by Anglian Water's Preferred Point of Connection (PPE) process. Phasing and infrastructure delivery will be managed through the IDP and planning obligations. This ensures the development is deliverable and effective, consistent with NPPF requirements.
1654	13489	Natural England (Jonathan Burt) [1654]	We acknowledge the need for a strategic allocation of 1650 new dwellings at Harwich and Dovercourt, despite its coastal location and proximity to Hamford Water SPA. The size of the allocation is capable of providing a greenspace to NE's SANG Standard (2021) (31.68ha) to mitigate adverse recreational pressure impacts. The issue of some/all of the allocated land and surrounding area being FLL should be addressed separately.	Comment	The Council welcomes Natural England's engagement and general acknowledgement that the allocation can be made acceptable subject to mitigation. The Habitats Regulations Assessment (HRA) identifies recreational disturbance as a key impact. The Council agrees that, given the size of the site, the proposed allocation is capable of providing Suitable Alternative Natural Greenspace (SANG) to Natural England specification and the policy has been updated to reflect this. In relation to Functionally Linked Land (FLL), the Council agrees that further evidence is required. The policy has been updated to require wintering bird surveys and FLL assessment, as well as the appropriate mitigation where required. These changes ensure the plan is legally compliant with the Habitats Regulations and sound.
358	13552	Historic England (Andrew Marsh, Historic Environment Planning Adviser) [358]	There are no designated heritage assets within the site, but a number lie just outside the site boundary and may be affected by development within their settings. These include the Grade II listed Millbank (LEN 1205216), Little Oakley War Memorial (LEN 1469631), and Foulton Hall Farmhouse (LEN 1322616). While development at this site is likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA) should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU5.	Comment	The Council will ensure that a Heritage Impact Assessment (HIA) is undertaken to inform the final policy and confirm suitability, capacity, and mitigation requirements. Policy SAMU5 is likely to be updated to require development to conserve and, where possible enhance, the significance of nearby heritage assets and incorporate mitigation measures identified through the HIA.

1656	14338	Tarchon Energy (Stuart Livesey, Development Director) [1656]	Tarchon supports the Local Plan process and highlights the need to account for the Tarchon Interconnector Project, a nationally significant energy scheme within Tendring. The Project is progressing through defined stages, with an identified search area that currently overlaps with several proposed allocations, including SAMU5, SAMU8 and SAMU9. Given its national policy support and infrastructure importance, it is considered essential that the Local Plan allows flexibility to accommodate its delivery. Ongoing coordination with the Council is recommended to manage interactions between proposed development sites and the Project's evolving footprint.	Comment	The Council is aware of the Tarchon Interconnector project and acknowledge that this is developing as a project of strategic importance as it is progressing through the pre DCO submission phases as a nationally significant infrastructure project. The Council will continue to balance the need to deliver the housing, business and infrastructure growth required by Central Government vs the needs and requirements of NSIPs such as the Tarchon Interconnector and will continue to engage constructively with Tarchon Energy and relevant stakeholders. At the time of writing, the Council's position is that the precise alignment and land requirements for the Tarchon Interconnector remain uncertain and any interaction will be addressed through the development management process and/or Development Consent Order (DCO) procedures. This approach ensures the Plan is effective and consistent with national policy on infrastructure delivery.
48	14364	Essex Police [48]	Strategic Policy SAMU5: Development Off Deane's Lane & Oakley Road, Dovercourt - At Criterion o. after 'health' insert "police, fire & rescue & ambulance" and after 'NHS/ICB' insert "police, fire & rescue and ambulance services" Updated paragraph to read; "o. financial contributions towards community facilities such as health, police, fire & rescue and ambulance provision as required by the NHS/ICB, police, fire & rescue and ambulance services, either through the Community Infrastructure Levy or Section 106 Planning Obligations."	Object	The Council does not object to the proposed amendment to more accurately reference police, fire and ambulance services within infrastructure contributions and has updated the policy accordingly to ensure clarity and consistency.
148	14487	Environment Agency (Environment Agency) [148]	Parts of the site are at tidal flood risk, which will increase with climate change. An updated SFRA is needed to assess impacts, support the Sequential Test, and guide site layout to avoid risk where possible. A Level 2 SFRA may be required to assess flood characteristics, climate impacts, and safety. The policy should require a sequential layout, placing vulnerable uses in lowest-risk areas, and safeguard land for future tidal defences, including buffers and maintenance access, with potential S106 contributions. While green infrastructure is welcomed, the policy should include specific expectations for estuarine protection, wintering bird surveys, recreational mitigation, and watercourse enhancement.	Comment	Flood risk is a key consideration for this proposed allocation. The Strategic Flood Risk Assessment (SFRA) has informed the application of the Sequential and Exception Tests. The Council agrees that a Level 2 SFRA is likely required. The supporting text to Policy SAMU5 has been updated to require a sequential layout of development, placing vulnerable uses in lowest risk areas. It also has been updated to require safeguarding of land for future tidal defences (including maintenance access), a site-specific Flood Risk Assessment incorporating climate change allowances, and contributions where necessary to strategic flood mitigation. The Council also agrees to incorporate requirements relating to estuarine protection, ecological mitigation, and watercourse enhancements.
826	14501	Essex Wildlife Trust (Annie Gordon) [826]	This allocation in Harwich and Dovercourt is one of the most ecologically sensitive strategic urban allocations in the plan. The HRA Screening Report classifies SAMU5 at Category C across all four impact pathways — functionally linked land, disturbance, water quality, and air quality — in relation to the Stour and Orwell Estuaries SPA and Ramsar site. This represents the highest	Comment	Similar concerns are raised by the Natural England and others (as set out and responded to above) – for the avoidance of doubt, policy SAMU5 has been updated to include and make specific reference to the requirement for a Functionally Linked Land assessment and for future layouts etc to be informed by this assessment, the provision of appropriate ecological buffers (including to coastal and intertidal environments), and the delivery

			composite level of concern of any allocation in the northern part of the District. We acknowledge that Dovercourt is an urban area where regeneration and infill are generally to be preferred, but the southern extension of this allocation toward Oakley Road brings development closer to the estuary and its associated functional habitat. The allocation policy should be strengthened to include specific requirements for FLL habitat assessment (to identify SPA bird feeding areas), mandatory riparian and coastal buffers, and pre-commencement habitat creation before any development that could affect SPA bird species.		of habitat creation and mitigation measures, potentially in advance of development phases where required and justified.
Businesses, Landowners and Developers					
853	13662	Taylor Wimpey [853]	The land is in multiple ownership, and has been promoted through the Local Plan process. It is not clear whether all associated landowners have development aspirations, or to what extent a coordinated approach has been discussed. The SHLAA (and subsequently the draft Local Plan) assume delivery from year 6 of the new Local Plan period. It is not clear what evidence this assumption is based on, and for this to be realistic, all relevant landowners would need to have aspirations for development in the short term.	Comment	The allocation has been promoted through the call for sites process and is supported by evidence in the SHLAA/HELAA and trajectory. Delivery assumptions are based on scale and complexity typical of strategic sites, as well as infrastructure requirements and phasing. The Council recognises the need for coordinated delivery and considers that an overarching framework (masterplan or equivalent mechanism) is necessary to ensure comprehensive development. Flexibility in how this is achieved (including phased or parcel-based approaches) can be accommodated. The trajectory will be kept under review.
1439	13868	Catesby Estates [1439]	Catesby supports Draft Policy SAMU5, which allocates land southwest of Dovercourt for a residential-led development of around 1,650 homes with community facilities and open space. Catesby controls a significant portion of the site and has prepared a Vision Document demonstrating that their land could deliver between 593 and 1,033 homes, depending on infrastructure and green space requirements. The Vision Document shows capacity for a 2-hectare primary school (if required), a 0.5-hectare community-led local centre, and approximately 52.64 hectares of green infrastructure and open space—exceeding draft policy requirements. Catesby argues that site capacity should reflect environmental constraints, infrastructure needs, and appropriate density, noting that the Strategic Housing Market Assessment already recognises these limitations. Catesby requests greater flexibility in applying several policy requirements. This includes rewording the neighbourhood centre requirement to ensure its scale is evidence-based, removing the requirement for an allocation-wide masterplan (due to multiple land ownerships and phased delivery), and reviewing the requirement for 20% Biodiversity Net Gain to align with the national minimum of 10% unless robust evidence justifies the higher figure.	Comment	The Council maintains that a comprehensive framework is necessary to ensure coordinated delivery, though the Council will look into incorporating more flexibility in preparation and phasing. Requirements concerning neighbourhood centres and infrastructure are evidence-based and informed by the IDP – these requirements have been refined and / or updated in line with the latest Infrastructure Development Plan and the requirements (for this site) set out therein. Engagement with infrastructure providers, including ECC Education, has continued and informed final policy wording. The higher Biodiveristy Net Gain target reflects current Essex wide ambition and evidence.

			The submission supports policy requirements relating to access, sustainable transport, landscape-led design, and green infrastructure. However, it highlights duplication and lack of clarity in education-related criteria, recommending that the policy be streamlined so that financial contributions are only sought where on-site provision is not delivered and where justified by evidence. Catesby questions the education and infrastructure assumptions in the Infrastructure Delivery Plan (IDP), arguing that pupil yield and infrastructure impacts are overstated when compared with much larger allocations elsewhere. The IDP's use of a higher dwelling number (1,882 rather than 1,650) is said to represent a worst-case scenario and risks undermining deliverability. Finally, Catesby states that any requirements for financial contributions, community facilities, healthcare, or A120 highway improvements must be proportionate, evidence-based, and compliant with NPPF tests, noting that existing transport evidence suggests the site would not present a constraint to growth.		
545	13901	Windermere Overseas Limited (Mr Brian Nalborough, Manager) [545]	We confirm, we have no objection in principle, to the allocation and the development of our Land, for the erecting of 1650 new homes in the SAMU5 proposals that you are suggesting.	Comment	Noted.
545	14384	Windermere Overseas Limited (Mr Brian Nalborough, Manager) [545]	Following our telephone conversation of today, in respect of the SAMU5 proposal, for the development of 1650 homes on land, of which in part, includes our Land, in the SAMU5 proposed allocation (See attached plan with the SAMU5 area marked in "orange"). The Land, which is owned by us, under Title Numbers and , and comprises of 40 acres of Land, bordering Low Road from the Languard View Housing Development, now being completed by Barratt David Wilson Homes, to the North-West of the Land. And to the Don Thompson Care Home and the New Hall Chalet Park and Park Holidays site, to the North-East of the Land. The Land virtually covers the total frontage of developable land on Low Road. And to the South-West, the sea, the sea wall and Hamford Water Nature Reserve and sandy beache We confirm, we have no objection in principle, to the allocation and the development of our Land, for the erecting of 1650 new homes in the SAMU5 proposals that you are suggesting. If you need any further information in connection to you proposals, please contact us.	Comment	Noted.
Community Representatives					
953	3536	Mr Community Campaigner	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case

		David Barton [953]	prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.		basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4154	Mrs Sally Webb [581]	The A120 is nose to tail most of the day as it is, where are these folk going to work? Not sustainable.	Object	The allocation is supported by transport evidence which assesses impacts on the A120 and wider network. Mitigation measures, to be informed by the IDP and ECC Highways, will be secured through the allocation wording as necessary. The Local Plan also supports economic growth and job creation alongside housing delivery. The strategy seeks to balance housing and employment provision in sustainable locations with infrastructure mitigation where necessary and justified by the evidence base.
1101	13792	Mrs joanna nightingale [1101]	Reasons for not developing the land west of Deans Lane Dovercourt, south of B1414 Oakley Road. 1. It used to be a coastal protection zone 2. A large part of the area is liable to flooding 3. The neigbouring field will be flooded when they breech the seawall. 4. Tarcon is planning to submerge a large electicity supply from north Germany, and bring it ashore at a not yet specified area between the caravan site in Dovercourt and the explotions factory. 5. The area is important for wild life. Hares, Bats, Phesants, muntjacks, birds of pary, badgers, little owls, stoats and squirrels 6. It is farmer Cullens livelyhood, with out the land on Southhall farm he can't sustain his business 7. There is a surface water pipe going through the area from B1414 to the brook, which drains the lake opposite Clowerwood stores 8. 1650 houses will increase pressure on Colchester hospital, the maternity was already over capacity in 2005, as an example. All specialities have long waiting times. 9. Anyone settling here will need a car 10. The A120 is also in bad repair, and there are often accidents due to the already heavy traffic. 11. The Essex Way goes through the area. 12. It is very difficult to entice GP's to come and work out here on the	Object	The Council has carefully considered the range of concerns raised, including flood risk and coastal change, impacts on infrastructure (healthcare, roads, utilities), ecology and loss of farmland, relationship to the Tarchon project, and the sustainability of development on the peninsula. In response, the Council has updated its SFRA, and policy safeguards will ensure development is located away from areas at risk of flooding and designed safely. The IDP identifies required upgrades, to be secured through planning obligations and phasing. In addition to the IDP, ongoing engagement with Anglian Water and other providers will ensure capacity and phasing are addressed for utilities. Transport evidence up to this stage demonstrates impacts can be mitigated. In response to Tarchon concerns, ongoing engagement will ensure compatibility with strategic infrastructure. With regard to ecology, the HRA, SANGs provision, and ecological assessments will ensure impacts are mitigated. The Council recognises the sensitivity of the location but considers that, with mitigation, the allocation represents a sustainable and necessary component of the housing strategy, consistent with national policy.

			peninsula. 13.If this development takes of I suggest that you reinstate the cottage hospital we had before, with maternity service, casualty, and gp in-patient beds. 14. The police and fire service has been reduced too in this area. 15. This is an area with not much opportunity for work already, we don't need to invite unimployed people from London to this area, which seem to be happening already. It is a lot cheaper for the london boroughs to ship their benefit users out here. 16. The doctors practices are over worked and their books are closed. 17. I have reported numerous potholes along the B1414, the road is in very bad repair, more traffic wont help the matter. I look forward to hearing your comments to my letter.		
610	13806	Mrs Linda Scott [610]	The Council has elsewhere and in close proximity to the site reviewed the boundary of the Coastal Protection Belt (Land of Deanes Lane and Oakley Road, Dovercourt (South Hall Ditch) also known as SAMU5. It is unclear why the site that we promoted which is closer to established residential boundaries and set further inland has not also been given detailed consideration. The developability of the SAMU5 site is evidence that it is possible, with the correct controls, to develop sites for residential development that are sensitive in visual impact terms and protect the character of the local area. From our detailed knowledge of the site having lived in this area for 76 years it is clear that our site is less visually exposed from the coast than the Land of Deanes Lane and Oakley Road. That isn't to say that we are seeking to challenge this site being included. The housing need is clearly vast. We are however, trying to draw attention to the lack of rigour in the evidence base that has caused several sites to be overlooked. As currently drafted the Local Plan makes no provision at all for growth in Little Oakley. This is considered an unsustainable solution to the very clear need in the area. Our site is considered to provide an opportunity for modest growth which would be of a scale that is commensurate with its place in the settlement hierarchy.	Comment	Site selection has been informed by a comprehensive and proportionate evidence base, including the careful assessment of all sites submitted through the two rounds of call for sites, with detailed reasons for discounting sites that have not progressed up to this stage. Other evidence that has been considered include an evolving sustainability appraisal. While other sites may have merits, the Plan must consider the most appropriate overall strategy. The allocation of SAMU5 does not preclude consideration of sites elsewhere.
1100	14110	Mr Peter Nightingale [1100]	Objection to SAMU5 - Loss of green space relating to a peninsula - Peninsula specific issues - Effect on health service - Water and sewage	Object	The Council has carefully considered the range of concerns raised, including flood risk and coastal change, impact on infrastructure (healthcare, roads, utilities), ecology and loss of farmland, the relationship to the Tarchon project, and sustainability of development on the peninsula. In response, the Council has updated its SFRA, and policy safeguards will ensure development is located away from areas at risk of flooding and designed safely. The IDP identifies required upgrades, to be secured

			- Flood risks - Tarchon interconnector - Inadequate roads - Destruction of farmland - Water drainage channels - Employment and AI		through planning obligations and phasing. In addition to the IDP, ongoing engagement with Anglian Water and other providers will ensure capacity and phasing are addressed for utilities. Transport evidence up to this stage demonstrates impacts can be mitigated. In response to Tarchon concerns, ongoing engagement will ensure compatibility with strategic infrastructure. The Council recognises the sensitivity of the location but considers that, with mitigation, the allocation represents a sustainable and necessary component of the housing strategy, consistent with national policy.
192	14120	Mrs Christine Woodman [192]	My comments relate to concerns about the impact of the proposed development in Dovercourt on coastal safety, landscape, and amenity. The area provides valued open space and access to natural habitats which are increasingly rare. With rising sea levels and reliance on a dyke for protection, there are serious concerns about flood risk and long-term safety. Development of this scale, close to the estuary, would harm the character of the area, affect views, and place people at risk. The site is considered inappropriate for such development given these environmental and safety issues.	Comment	Concerns with regard to flooding are noted. Flood risk is a key consideration for this proposed allocation. Not all of the site is in areas at risk of flooding, the northern part of the site is in flood zone 1 and the development will be concentrated in these areas. The final Strategic Flood Risk Assessment (SFRA) will inform the application of the Sequential and Exception Tests. The Council agrees that a Level 2 SFRA is likely required. Policy SAMU5 has been updated to require a sequential layout of development, placing vulnerable uses in lowest risk areas. It also requires safeguarding land for future tidal defences (including maintenance access), site-specific Flood Risk Assessment, incorporating climate change allowances, and contributions where necessary to strategic flood mitigation. The Council also agrees to incorporate requirements relating to estuarine protection, ecological mitigation, and watercourse enhancements. Similar concerns are raised by the Natural England and others (as set out and responded to above) – for the avoidance of doubt, policy SAMU5 has been updated to include and make specific reference to the requirement for a Functionally Linked Land assessment and for future layouts etc to be informed by this assessment, the provision of appropriate ecological buffers (including to coastal and intertidal environments) and the delivery of habitat creation and mitigation measures, potentially in advance of development phases where required and justified.
1101	14341	Mrs joanna nightingale [1101]	I object to the proposed development at SAMU5 (land off Deanes Lane and Oakley Road, Dovercourt) due to the cumulative impact of significant planned growth, which would greatly increase the local population without corresponding infrastructure improvements. The loss of valued coastal agricultural land would harm access to countryside on a constrained peninsula, affecting wellbeing and biodiversity. Concerns are raised regarding overstretched health services, unreliable water and sewage infrastructure, flood risk, and inadequate road capacity. The site also conflicts with national policy on environmental protection and flood avoidance, and may	Object	The Council has carefully considered the range of concerns raised, including flood risk and coastal change, impact on infrastructure (healthcare, roads, utilities), ecology and loss of farmland, the relationship to the Tarchon project, and sustainability of development on the peninsula. In response, the Council has updated its SFRA, and policy safeguards will ensure development is located away from areas at risk of flooding and designed safely. The IDP identifies required upgrades, to be secured through planning obligations and phasing. In addition to the IDP, ongoing

			constrain nationally significant infrastructure projects, making it unsuitable for development. (SEE ATTACHED DOCUMENT FOR MORE INFORMATION)		engagement with Anglian Water and other providers will ensure capacity and phasing are addressed for utilities. Transport evidence up to this stage demonstrates impacts can be mitigated. In response to Tarchon concerns, ongoing engagement will ensure compatibility with strategic infrastructure. The Council recognises the sensitivity of the location but considers that, with mitigation, the allocation represents a sustainable and necessary component of the housing strategy, consistent with national policy.
1100	14355	Mr Peter Nightingale [1100]	I object to the proposed SAMU5 development of up to 1,650 homes due to its cumulative and unacceptable impacts. The loss of valued coastal green space on a peninsula would disproportionately affect residents' access to countryside and wellbeing. Infrastructure has not kept pace with existing growth, with health services, water, sewerage, and roads already under strain. Significant flood risks, unreliable utility provision, and constraints from the Tarchon interconnector further question suitability. The development would also result in the loss of productive farmland. Taken together, these issues demonstrate the proposal is unsustainable and contrary to national policy. (SEE ATTACHMENT FOR FURTHER INFORMATION)	Object	The Council has carefully considered the range of concerns raised, including flood risk and coastal change, impact on infrastructure (healthcare, roads, utilities), ecology and loss of farmland, the relationship to the Tarchon project, and sustainability of development on the peninsula. In response, the Council has updated its SFRA, and policy safeguards will ensure development is located away from areas at risk of flooding and designed safely. The IDP identifies required upgrades, to be secured through planning obligations and phasing. In addition to the IDP, ongoing engagement with Anglian Water and other providers will ensure capacity and phasing are addressed for utilities. Transport evidence up to this stage demonstrates impacts can be mitigated. In response to Tarchon concerns, ongoing engagement will ensure compatibility with strategic infrastructure. The Council recognises the sensitivity of the location but considers that, with mitigation, the allocation represents a sustainable and necessary component of the housing strategy, consistent with national policy.
428	14427	Mr N Neale [428]	These representations seek the removal of Land South of Church Hill, Ramsey from the Strategic Green Gap and its allocation for around 50 dwellings, arguing that the site is a contained settlement-edge parcel whose release would not undermine the wider separation role of the gap. They also contend that allocation would strengthen the Harwich and Dovercourt growth strategy by adding a more flexible, deliverable and heritage-led site to a housing portfolio that is currently heavily reliant on a small number of larger and more constrained allocations, particularly SAMU5.	Comment	The spatial strategy intentionally includes a mix of site sizes, including strategic allocations such as SAMU5, to ensure delivery of infrastructure and comprehensive growth. Smaller sites also contribute to flexibility and supply.

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

Summary of Representations

Key issues were raised by respondents in response to Policy SAMU5. Several representations emphasised development impacts on internationally designated habitats, Functionally Linked Land and coastal ecology. This was followed by calls for a requirement for Suitable Alternative Natural Greenspace (SANG) and biodiversity mitigation, as well as flood risk, climate change resilience and future tidal defence requirements. Other representations focused on infrastructure and utilities, calling for the protection of existing Anglian Water infrastructure, the delivery of drainage solutions, the need for active travel infrastructure, the enhancement of Bridleway 36 and multi-user routes, on-site sport and leisure provision, and more general infrastructure upgrades to support healthcare, education, transport, utilities, and emergency services. Responses also mentioned the need for a heritage assessment and the protection of nearby listed buildings. The need for a coordinated masterplan across multiple land ownerships was mentioned, as well as considerations for the relationship with the proposed Tarchon Interconnector project.

In response to key issues, Policy SAMU5 has been updated. Environmental requirements have been updated to include the provision of SANG where required, the protection of Habitats Sites and Functionally Linked Land, and reference to Natural England's guidance. The updated policy has enhanced landscape and placemaking requirements, including landscaping and mitigation measures to minimise visual impacts and better integrate the development within its surroundings. The policy wording also includes an enhanced infrastructure-led approach, requiring delivery to be informed by the latest evidence, Infrastructure Delivery Plan, HRA, SFRA, and other relevant studies. Utility infrastructure requirements have been expanded, including early engagement with water and utility providers and alignment of infrastructure delivery with development phasing. Similarly, sustainable transport wording has been strengthened, including active travel provisions, safeguarding of Bridleway 36, and improving links to the wider rights of way network. Education requirements have been added, including land and/or contributions for Early Years and Childcare, primary and secondary education provision based on Essex County Council evidence.

Policy SAMU6: Development of Weeley Green Garden Village

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3644	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	Bridleway 24 enters the far north-west of the SAMU5 Garden Village allocation, creating a clear opportunity to enhance and extend equestrian-grade infrastructure. This should include a Pegasus crossing over the Weeley Bypass to maintain safe, continuous access for riders, cyclists and walkers. With 900 homes proposed, increased traffic will heighten risks for vulnerable users unless segregated off-road provision is secured. The masterplan should deliver a continuous circular Multi-User Route around the entire site, acting as a protective buffer and connecting the many footpaths that border the development, creating a resilient, coherent and inclusive active-travel network.	Comment	The Council acknowledges the opportunity to enhance multi-user connectivity, including provision for equestrians. The comprehensive masterplanning requirement for SAMU6 will deliver an integrated network of walking, cycling and multi-user routes, linking with existing public rights of way and surrounding settlements. Detailed design, including the need for specific crossing infrastructure such as a Pegasus crossing, will be considered through transport assessment and masterplanning in consultation with Essex County Council as Highway Authority. The policy as drafted provides sufficient flexibility to secure appropriate infrastructure without prescribing specific solutions at this stage.
791	3717	Sport England (Mr Roy Warren, Planning Manager) [791]	A site of approximately 1,650 dwellings is one of the largest allocations in the plan and should make on-site provision for sports facilities. The additional demand associated with the scale of this development will be difficult to be met by improving the capacity of nearby facilities in the local area. The 16 hectares of strategic open space proposed would offer the opportunity for outdoor sports facility needs to be included as part of this provision. An additional policy requirement is therefore requested which requires outdoor and indoor sport and leisure provision to be provided on-site.	Comment	The policy already requires strategic open space and a neighbourhood centre, and the evidence base to date suggest that indoor and outdoor sports provision will be addressed through masterplanning, on-site provision where appropriate, and/or developer contributions in line with identified needs. The existing policy framework provides sufficient flexibility to secure appropriate provision without the need for additional prescriptive wording.
349	4324	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	The ICB would like to make it clear that mitigation will be required to strategically plan for growth. A flexible approach to mitigation needs to be considered as the Neighbourhood Health model emerges and infrastructure considerations can be met.	Comment	The Council agrees that a flexible approach to healthcare infrastructure planning is necessary. The policy already requires engagement with the NHS/ICB and secures appropriate mitigation through developer contributions and infrastructure planning. This approach aligns with the evolving neighbourhood health model
6	13474	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	It is noted that a further 900 homes are proposed as an extended mixed-use development. The plan must be read as a whole and therefore policies, including new Strategic Policy PPL5 Water Conservation, Drainage and Sewerage, will apply. As indicated in our response to SAMU2, there is currently scheme for the WRC will be progressed to delivery. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately (including connections to the network), once a PPE is submitted by the developer. The PPE will identify whether there are sustainable points of connection (SPoC) into our network by using a complexity matrix	Comment	The Council supports an approach of early engagement and phased infrastructure delivery. The requirements for foul drainage assessment, sustainable connections and phasing will be secured through planning conditions and alignment with Policy PPL5 and wider Local Plan policies. The use of Grampian-style conditions, where necessary, is accepted as part of the development management process.

			that presents several factors for assessment including pollution risks and storm overflow spills, surcharges of our network, existing flood potential and excess surface water flooding. Our engineers will identify a sustainable point of connection to our network (or sustainable points of connection depending on phasing) to avoid these constraints. The site is on the very edge of the north west of the WRC catchment where sewers will be sized according to the current development in Weeley. A PPE is strongly advised to ensure that connections are appropriately phased and environmentally robust, we recommend that appropriate planning conditions are imposed, so development is phased with in step with delivery of the required sewerage infrastructure. We support the policy requirement for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site. No capacity to accommodate wastewater flows from new growth at Clacton Holland Haven WRC. However, a named growth scheme has been identified in our PR24 Business Plan for Clacton-Holland Haven WRC for delivery in AMP8 (2025-2030). Currently, Anglian Water is recommending a Grampian condition is attached to any planning consent for new development, to ensure that the development is not occupied until the growth scheme has been delivered, to prevent environmental harm. Due consideration should be given to the time required for the submission and determination of outline planning application, discharge of conditions, and subsequent reserved matters consents to be obtained before construction can commence. During this time the growth		
1654	13504	Natural England (Jonathan Burt) [1654]	Should be updated to require a minimum of 17.28ha of SANG.	Comment	The Council welcomes Natural England's engagement and general acknowledgement that the allocation can be made acceptable subject to updates. The Council agrees that, given the scale of SAMU6, the site is capable of accommodating Suitable Alternative Natural Greenspace (SANG) in accordance with Natural England's standards. To ensure consistency with other strategic allocations and to provide greater clarity, the policy wording will be updated to reflect the expectation that an appropriate quantum of SANG (including around 17.28ha where justified by detailed assessment) will be delivered as part of the overall green infrastructure strategy. This will be informed by the Habitats Regulations Assessment and masterplanning process.
358	13553	Historic England (Andrew Marsh, Historic Environment Planning	There are no designated heritage assets within the site, but a number lie just outside the site boundary and may be affected by development within their settings. These include the Grade II listed Weekley House (LEN 1235273), The Ancient House (LEN 1265109), The Elms (LEN 1235274), and 2, The Street (LEN 1235347). While development at this site is likely to be achievable in heritage	Comment	The Council acknowledges the presence of nearby heritage assets and the need to consider potential setting impacts. The June 2026 evidence base confirms that there are no overriding heritage constraints to allocation. A Heritage Impact Assessment will be undertaken at the appropriate stage to inform masterplanning and any mitigation measures. The policy framework already requires assessment and mitigation of heritage impacts and is therefore considered sound.

		Adviser) [358]	terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA) should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU6.		
823	13566	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	ECC considers that the rationale for this choice of this Garden Village location is robust and the proposed scale of growth appropriate given the considerations and constraints cited (including other growth already planned / underway here and land availability). This comment needs to be considered alongside the transport focused comments reflecting the likely scale and nature of necessary sustainable transport measures and infrastructure likely being considerable. The existing railway station offers a very important asset in this regard and consideration towards a more attractive level of service to encourage greater use of this is suggested. The constraints affecting this location outlined in the Draft Plan are acknowledged. However, the relatively sustainable location means that in principle, ECC sees merit in exploring opportunities for larger scale growth at Weeley Green, potentially in this Plan period ECC and / or beyond it. There is no clear, explicit reference to a policy requirement as yet for this growth to follow the established Garden Community principles, in order to promote the best outcomes for this growth. This additional wording incorporation is recommended as follows by adding to criterion a. as follows: a. approximately 900 new homes of mixed sizes and type to include affordable housing in accordance with the Council's requirements as set out in policy LP5, and serviced land for self-build and custom-built homes to be planned and delivered in line with Garden Community principles; As part of the Education Scenario Test completed in January 2026 it was suggested that new primary school provision may best be located on-site. This would be in line with TCPA Garden Community principles. The size or characteristics of any new school at Barleyfields has yet to be determined and reference to a two-form entry primary school should be removed from this policy.	Comment	The Council notes ECC's support for the location and scale of growth. The principles of Garden Communities are embedded within the strategic approach to site planning and delivery, as set out in the broader Local Plan framework and supporting evidence. It is not considered necessary to duplicate this within the policy wording at this stage. In relation to education provision, the policy retains appropriate flexibility to respond to updated evidence and delivery mechanisms, the policy has been amended to now include specific references as necessary and in the build up to the regulation 19 consultation.
823	13567	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The Garden Villages present an opportunity to ensure new neighbourhoods are designed to support healthy ageing and independence for all residents, including older people and people with disabilities and/or mental health needs. Applying inclusive and accessible design principles early will help ensure environments are inclusive for people at all life stages. • The policies do not reference dementia inclusive design principles. Incorporating Essex and national guidance, including the	Comment	The Council agrees that the inclusion of inclusive and dementia-friendly design principles will strengthen the policy and support the creation of healthy, accessible communities. The policy has been updated to reference the Essex Design Guide – Inclusive Design, alongside relevant national guidance (including EADDAT), and to set clear expectations around accessible routes, legible layouts and effective wayfinding.

			Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024), would help ensure new neighbourhoods provide clear wayfinding and are easy to navigate for all residents. • The policies do not reference the importance of accessible routes and clear wayfinding, which are essential to support people to move around easily. • Ensuring streets, paths and public spaces are designed to be easy to navigate will support independence and inclusive accessible communities. • Reference to the Essex Design Guide- Inclusive Design would provide clear expectations for inclusive layouts, accessible public realm, and neighbourhood design that supports independence all resident, including older people and people with disabilities and/or mental health needs. The Garden Village policies do not reference inclusive or dementia inclusive design principles and do not set expectations for accessible environments. These omissions risk limiting the ability of new neighbourhoods to support independence, inclusive communities and healthy ageing. Next Steps / Alternative Wording “Developments will demonstrate compliance with the Essex Design Guide -Inclusive Design to ensure new housing, neighbourhood layouts and public realm support inclusive, accessible environments for all residents, including older people and people with disabilities and/or mental health needs. Developments will incorporate dementia-inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024). Neighbourhoods will include accessible routes and clear wayfinding to support people to move around easily and independently, promoting inclusive communities.”		
48	14361	Essex Police [48]	Strategic Policy SAMU6: Development of Weeley Garden Village At Criterion o. after ‘health’ insert “police, fire & rescue & ambulance” and after ‘NHS/ICB’ insert “police, fire & rescue and ambulance services” Updated paragraph to read; “o. financial contributions towards community facilities such as	Object	The Council does not object to the proposed amendment to explicitly reference police, fire and ambulance services within infrastructure contributions and will update the policy accordingly to ensure clarity and consistency. The policy has been updated.

			health, police, fire & rescue and ambulance provision as required by the NHS/ICB, police, fire & rescue and ambulance services, either through the Community Infrastructure Levy or Section 106 Planning Obligations."		
148	14488	Environment Agency (Environment Agency) [148]	Updates to the Flood Map for Planning from the Environment Agency's NaFRA2 project (March 2025) have identified additional areas of Flood Zones 2 and 3 within the site. An updated SFRA is recommended to reflect these changes, support a robust Sequential Test, and guide site layout to avoid flood risk areas. Point J of the draft policy should be expanded to include a requirement to avoid identified areas of flood risk, aligning with the aims of NPPF paragraphs 172, 173 and 181(a).	Comment	The Sequential and Exception Tests, alongside the updated Strategic Flood Risk Assessment, will inform site layout and design. Policy requirements already ensure that development will avoid and mitigate flood risk in accordance with national policy. Additional wording is not considered necessary as these matters are addressed through existing policies and detailed design stages.
Businesses, Landowners and Developers					
705	4095	Mr Peter Le Grys [705]	This site has been rejected previously due to the significant damage it would cause to the rural character of the district. Such proposal flies in the face of any logic towards sensible and considered places and will merely add to the congestion on the A133 while damaging the pleasant agrarian nature of this key site at the centre of the district.	Object	The Council does not agree that the allocation is inappropriate. The selection of SAMU6 has been informed by a robust evidence base and sustainability appraisal, as confirmed in the June 2026 Committee Reports. The masterplanned approach ensures that impacts on character, infrastructure and transport are appropriately mitigated. The site represents a logical and sustainable location for growth within the District.
431	4461	Welbeck Strategic Land [431]	The Weeley Green Garden Village allocation should be deleted and replaced by housing allocations at existing settlements elsewhere in the District.	Object	The Council does not support the deletion of the allocation. The spatial strategy has been carefully developed to meet identified housing and economic needs in a sustainable manner. Strategic allocations such as SAMU6 play a key role in delivering comprehensively planned growth alongside necessary infrastructure. The evidence does not support redistribution to smaller sites as a preferable alternative.
136	4468	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	The Policy and proposed site allocation, shown on plan SAMU6 above, are fully supported. Work undertaken by a Consultant Team demonstrates that there are no over-riding constraints or 'show stoppers' and that the proposals are deliverable. The site is in single ownership and there are no reasons why the development cannot commence within a short timeframe. A pre-application request is currently in preparation to make an early planning application. Details of work undertaken thus far, including illustrative masterplan are contained in the attached 'Weeley Green Garden Village - Development Proposals,' showing how Policy SAMU6 can meet all the stated requirements.	Support	Noted.
136	4492	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	For reasons set out in detail in our submission relating to New Strategic Policy SAMU6 - Development of Weeley Green Garden Village, which provides details of how the policy can be delivered through a masterplan-led approach.	Support	Noted
853	13663	Taylor Wimpey [853]	The SHLAA confirms that there are a number of Environmental Constraints (demonstrated by the previous refusal). Furthermore, the SHLAA notes that the scale of development would need to be	Comment	The June 2026 Committee Reports confirm that there are no insurmountable constraints and that the site is suitable for comprehensive development. Masterplanning will ensure coordinated

			supported by new services and facilities which are only realistically deliverable as part of a wider comprehensive scheme. The site was submitted by a planning consultant, however the landownership is not stated – it is therefore not clear how likely it is for a comprehensive scheme to come forward.		delivery of infrastructure and services. Matters relating to land ownership and delivery will be addressed through the planning process and ongoing engagement.
674	14263	AWG Landholdings [674]	New Strategic Policy SAMU6 relates to the development of the Weeley Green Garden Village, which is proposed to be allocated for a major residential and mixed-use development comprising approximately 900 new homes, approximately 16 hectares of strategic open space, and approximately 2 hectares for a neighbourhood centre to include local shops, services, and community facilities. This site lies to the west of our client's land, across the Weeley Bypass. Our client, AWG Land Holdings Ltd, is generally supportive of New Strategic Policy SAMU6, which rightly recognises the appropriateness and suitability of Weeley as a sustainable location that could accommodate further residential growth. In this context, our client's land at 'Land East of Willow Walk' represents a logical opportunity that could deliver up to 9 dwellings in a sustainable location adjacent to existing residential development, in close proximity to the Weeley Train Station, and to the north of the railway line which forms a clear settlement edge. We reserve the right to comment further on the policy wording within future stages of Local Plan consultation.	Comment	The comments regarding adjacent land are noted but fall outside the scope of this allocation.
1530	14303	Berrys (Lauren May, Senior Planning Consultant) [1530]	We strongly object to the Weeley Green (SAMU6) which the Local Authority seek to allocate for around 900 houses. We disagree with the principle of providing the majority of the plan period's housing within three garden communities which will all require a significant amount of infrastructure and other investments to enable them to come forward. It is unclear how necessary highway and other infrastructure improvements would be provided and funded and therefore at this stage we believe that the proposed housing numbers should be removed from the housing trajectory for the entire plan period.	Object	The Council does not agree that the strategy is inappropriate or undeliverable. The reliance on strategic sites is supported by national policy and underpinned by a strong evidence base, including infrastructure planning and viability work set out in the June 2026 Committee Reports. The delivery of infrastructure will be secured through policy mechanisms, developer contributions and partnership working. The site remains suitable and deliverable.
Community Representatives					
953	3537	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	The representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1712	14239	Bernard Jenkin [1712]	The proposed new standalone garden community settlements are reasonably small, but they are unlikely to be as financially viable as urban extensions. This is because the infrastructure for these developments will have to be built from scratch. Labour's eco towns failed, and the garden communities struggle in practice as we both know too well	Comment	The Council notes the concerns regarding viability. The evolving evidence base for the Local Plan includes viability and delivery assessments demonstrating that the proposed Garden Communities are capable of being delivered, including with the necessary infrastructure. Work is ongoing in respect of phasing of necessary infrastructure delivery and the

					masterplanned approach provides a framework to ensure phased and coordinated delivery.
142	6595	Weeley Parish Council (Mr kevin harkin, parish clerk) [142]	We object to the proposed Weeley Green Garden Village, citing inadequate transport capacity, insufficient biodiversity gains, lack of affordable housing, missing social-care and education provision, overstretched infrastructure and uncertain future governance.	Object	The Council acknowledges the concerns raised; however, the allocation is supported by a comprehensive evidence base which is continuing to evolve, including transport, infrastructure, environmental and viability information. The policy requires appropriate provision for infrastructure, affordable housing, biodiversity and community services, all of which will be secured through masterplanning and the planning process (where mechanisms such as planning conditions and legal agreements exist to ensure all these elements can be legally secured and delivered). At this stage no substantive or overriding evidence has been provided to justify removal of the allocation.
90	13438	Tendring Parish Council (Mrs Marie Snell, Clerk/RFO) [90]	The proposed development (Weeley and Horsley Cross) appears heavily weighted towards residential growth, with insufficient corresponding employment opportunities within or near the parish. This imbalance would: • Increase commuter traffic. • Place further strain on the road network. • Undermine the sustainability objectives of the Plan. • Risk creating a dormitory settlement lacking local economic vitality. Housing growth must be aligned with realistic local employment provision to avoid unsustainable patterns of travel.	Object	The Council notes concern regarding the balance between housing and employment. The allocation includes a neighbourhood centre and is supported by the wider spatial strategy, which directs further employment growth to appropriate locations across the District, including in locations close to the proposed Weeley Garden Village. For example the Local Plan also proposes a 2-hectare employment allocation directly opposite and to the north of the proposed Weeley Garden (referred to as Land to the North of Colchester Rd, Weeley (Weeley Car boot site)). In addition, the proximity to the rail network and strategic roads supports sustainable access to employment opportunities. The overall strategy is considered balanced and consistent with national policy.
Members of the Public					
457	4256	Ms Carol Bannister [457]	This area is greater than that of Weeley plus Weeley Heath and signifies the annihilation of a historic parish. The station is on the slow line, surrounding roads and lanes will not cope withe the inevitable increase in traffic and many are not suitable for pedestrians and cyclists. As a pedestrian it took me over 5 minutes to cross Colchester Road this afternoon! The already existing infrastructure problems within this rural area will be exacerbated still further and residents' quality of life will continue to deteriorate.	Object	The Council acknowledges the concerns raised by local residents regarding the scale of the proposed development, transport capacity, and the potential impact on the character of the area. It recognises that, in the absence of appropriate mitigation and infrastructure improvements, many of these concerns would be valid. However, the proposed Garden Village allocation has been subject to comprehensive assessment through the Local Plan process. This has included detailed consideration of transport impacts, infrastructure capacity, and the need to protect residential amenity and local character. The development will not proceed in isolation. It will be supported by a coordinated masterplanning approach which requires the delivery of essential infrastructure alongside growth. This includes significant transport and highway improvements, measures to manage traffic impacts, and the provision of safe, accessible routes for pedestrians and cyclists.

					The Council is committed to ensuring that necessary mitigation is secured and implemented in tandem with development. This is intended to address existing infrastructure constraints, minimise adverse impacts on the local highway network, and support safe and sustainable travel choices, thereby protecting residents' quality of life.
1417	4383	Mr Reginald Tricker [1417]	- imprecise regarding routes/areas needed for active travel connections within Weeley outside of development boundary - no vision for specific active travel routes/sustainable corridors across Weeley/Heath and to/from complementary services in nearest towns/villages, e.g. Clacton, Great Bentley, Little Clacton, Thorpe etc. to reduce car trips as dominant choices, due to lack of safe cycling conditions, and infrequent and unreliable bus services with old fashioned vehicles. - LCWIP could/should be referred to? - transport evidence base (Assessment case), mentions Weeley-Thorpe Greenway; missing from online map and local plan text? Seems unlikely to get funding for strategic measures if not included	Comment	The Council recognises the importance of active travel connectivity. Strategic and local walking and cycling routes will be developed through masterplanning, informed by the Local Cycling and Walking Infrastructure Plan and transport evidence base. It is not necessary to specify all routes within the policy itself as this level if detail with be forthcoming as part of the Development Management Process.
1417	4386	Mr Reginald Tricker [1417]	Weeley should be given a formal village centre designation and there should be a layer for strategic sustainable transport corridor aspirations, to help build the case for developer contributions	Comment	The designation of centres and strategic transport corridors is addressed through the wider Local Plan framework and supporting plans. That said, at present, Weeley does not contain the level or concentration of shops and services that would justify its designation as a village centre within Policy PP3. In addition, existing retail and service uses in Weeley are protected through the criteria-based policy approach in the first part of Policy PP3, which seeks to retain local shops and services that are important to the day-to-day needs of residents.
1417	4392	Mr Teginald Tricker [1417]	LTP4 provides a weak basis for improvements and Weeley is not mentioned in the consultation draft, if at all, and the implications of the Garden Village are not drawn out/made apparent. The Sustainable Travel Assessment of 2025 also lacks any detail regarding actual sustainable travel needs for Weeley.	Comment	The Council's transport evidence base, including the Sustainable Travel Assessment, supports the allocation and identifies necessary improvements. Further detail will be developed through masterplanning and in partnership with the Highway Authority. The current policy approach remains appropriate.
969	4448	Mr Scott Gilmour [969]	Its location beside the train station and road infrastructure makes it well suited for more homes. It is unfortunate that more development is not occurring around existing stations as there is untapped capacity and benefits that can be unlocked by doing so. Additional residents should hopefully result in the implementation of a Sunday train service, along with further frequency increases. Improvements to bus services will be necessary as well, especially to reach the new Hare Green and Horsley Gross Garden Villages.	Support	This is noted and the support is welcomed.
1518	13759	Emma Bumpstead [1518]	Weeley Green Garden Village (Policy SAMU6) is unsound, undeliverable and premature. There exists severe primary care shortages, with GP-to-patient ratios already exceeding safe limits and no secured funding or workforce strategy to support growth. The proposal also fails to address existing congestion on the A133/A120	Object	The Council does not agree that the allocation is unsound or undeliverable and has worked with the site promoter and land owner to ensure that an allocation of this scale and nature can be delivered. Infrastructure requirements, including healthcare, transport, drainage and environmental mitigation, have been considered through the

			corridor, risks to emergency access, surface water flood risk, ecological harm, and loss of rural character. The Council consider infrastructure-led planning, proposing deferral, major scale reduction, or redistribution of housing to more sustainable locations with existing capacity.		evidence base and will be secured through policy requirements, phasing and developer contributions.
719	14375	Mr Peter Harris [719]	Establishment of a 'Veteran Village' within the development Amendment to Part (a): Include reference to: "...a mix of housing types including provision for armed forces veterans, park home accommodation, and modular or custom-built homes " Strategic Opportunity: The Weeley site (approx. 900 homes) presents an ideal opportunity to deliver: A flagship Veteran Village Integrated community infrastructure A diverse and balanced housing mix Innovation in delivery and tenure models Historic Context & Place-Based Justification: Weeley has a long-standing historic connection to the British Army, dating back to Napoleonic times, when the area formed part of the nation's coastal defence network. This heritage provides a unique and meaningful foundation for locating a Veteran Village in Weeley, creating a direct link between past and present service to the country. Recognising and building upon this history would add cultural depth, identity and national significance to the development. Wider Benefits: National recognition for Tendring Job creation (construction, care, support services) Reduced pressure on existing housing stock	Comment	The Council welcomes the constructive suggestion to explore opportunities for accommodating armed forces veterans and other specialist housing groups as part of the proposed development at Weeley. The recognition of the area's historic association with the armed forces and the aspiration to create a distinctive and inclusive community are both noted and appreciated. Through the emerging Local Plan, the Council is already committed to delivering a diverse range of housing types, tenures, and specialist accommodation to meet the needs of all sections of the community, including those with particular housing requirements. This includes providing flexibility within policies to support innovative housing solutions, different delivery models, and accommodation tailored to specific groups where a clear need is identified. In addition, the Council recognises its wider responsibilities under the Armed Forces Covenant, which seeks to ensure that current and former service personnel are not disadvantaged in accessing housing and, where appropriate, receive additional support. The Council already works with relevant partners and organisations to support veterans in housing need and will continue to build on these relationships. The Garden Village concept, including at Weeley, is intended to deliver comprehensively planned, mixed and balanced communities supported by appropriate infrastructure. As part of the ongoing masterplanning process, there will be opportunities to further explore how different forms of specialist and supported accommodation—including provision that may benefit veterans or other identified groups—could be positively integrated, subject to evidenced need, viability, and deliverability. The Council will therefore continue to engage with Essex County Council, representative organisations, and other stakeholders to better understand the potential role that such provision could play within the development, ensuring that any future policy approach remains flexible, evidence-led, and aligned with the overarching objective of delivering high-quality, inclusive communities for all residents.

Policy SAMU6: Development of Weeley Green Garden Village

Summary of Representations

Representations on SAMU6 covered a broad range of issues including the principle and deliverability of the Garden Village, transport and active travel connectivity, healthcare provision, sports and leisure facilities, wastewater infrastructure, habitat mitigation and SANG provision, heritage impacts, flood risk, community infrastructure, inclusive design, housing mix, and the relationship between housing and employment growth. While a number of respondents supported the allocation and its strategic location, others objected to the principle of a new Garden Village and raised concerns regarding infrastructure capacity and delivery. The Council concluded that the allocation remains justified, sustainable and deliverable, supported by an evolving evidence base, a comprehensive masterplanning approach and the ability to secure infrastructure through planning obligations, conditions and partnership working. Limited amendments were supported to provide additional clarity around habitat mitigation, inclusive design and community infrastructure requirements.

In response to representations, changes have been made to policy SAMU6 and its supporting text. The policy was amended to include a clarity around the provision of Suitable Accessible Natural Greenspace (SANG) as part of the site's green infrastructure strategy, informed by the Habitats Regulations Assessment, Natural England guidance and detailed masterplanning work. It has also been updated to include stronger references to inclusive and dementia-friendly design principles, including reference to the Essex Design Guide – Inclusive Design and relevant national guidance where appropriate. Policy requirements relating to accessible routes, legible layouts and effective wayfinding were strengthened to support healthy ageing, accessibility and inclusive communities. Community infrastructure wording was amended to explicitly recognise the potential need for police, fire and rescue, and ambulance service infrastructure and associated contributions alongside healthcare infrastructure. Supporting text and evidence were updated, where necessary, to reflect the importance of phased wastewater infrastructure delivery and early engagement with Anglian Water. However, no changes were made to require specific sports facilities, Pegasus crossings, detailed active travel routes, railway service enhancements or additional flood risk wording, as these matters were considered more appropriately addressed through the masterplanning, transport assessment and development management processes.
No changes were made to the overall scale, location or strategic role of the allocation, as the Council concluded that the evidence base continued to support the allocation as a sustainable and deliverable Garden Village.

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

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
926	3900	National Landscape Office (Beverley McClean, National Landscape Planning Officer) [926]	The proposed Salting's Quater in Manning tree lies adjacent to the River Stour which forms part of the Suffolk & Essex Coast & Heaths National Landscape. The policy does not explicitly mention the National Landscape which will be an important issue in terms of the design of the proposed scheme in this land. A new bullet point should be added into Policy SAMU7- see below for suggested text Development should positively contribute to the conservation and enhance the natural beauty of the neighbouring Suffolk & Essex Coast & Heaths National Landscape which abuts the site	Comment	The Council acknowledges that the site lies adjacent to the Suffolk & Essex Coast & Heaths National Landscape and agrees that this is a key consideration in the design and layout of redevelopment proposals. Policy SAMU7 already promotes high quality design and sensitivity to context and the Local Plan also contains a separate policy (PPL3) which states, amongst other things, that development proposals (affecting protected landscapes) must further the purposes of the Dedham Vale, and Suffolk Coast and Heaths National Landscapes and their settings. However, for clarity and effectiveness, the policy has been amended to explicitly require development to conserve and enhance the natural beauty and setting of the adjacent National Landscape, including through building heights, massing, materials, and views.
1653	13437	Suffolk County Council (Georgia Teague) [1653]	40 dwellings Based on our pupil yield this development would yield 13 primary pupils and 6 secondary pupils. The development is adjacent to the catchments area for Brooklands Primary School and East Bergholt High School in Suffolk. Brooklands Primary is forecast to exceed 95% capacity during the current forecast period. 19% of students on roll attend from out of county based on the January 2025 census data. East Bergholt High School is not currently forecast to exceed 95% capacity during the forecast period. However, the number of pupils arising from applications pending decision is expected to cause the school to exceed 95% capacity based on current forecasts. 18% of students on roll attend from out of county based on the January 2025 census data.	Comment	Given the modest scale of development (circa 40 dwellings), the impact on school capacity is limited but nonetheless material. The Council will continue to engage with Essex County Council as the education authority, alongside Suffolk County Council where cross-border impacts arise. Where necessary, proportionate financial contributions will be secured through planning obligations in accordance with the statutory tests. The policy's criteria-based approach is considered sufficiently flexible.
6	13475	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	There is currently no capacity available at Manningtree WRC, and no growth scheme identified to increase dry weather flow headroom at the WRC in AMP8 (2025-2030). Growth in this WRC catchment should be phased for delivery later in the Local Plan period to allow further investment at the works to be delivered from 2030 (AMP9). We support the policy requirement K. for early engagement with Anglian Water to secure the necessary upgrades to both treatment infrastructure and network – this should inform a foul drainage assessment for the site. Regarding the policy requirement for surface water, we support the statement that it must not be discharged to the combined sewer network. Anglian Water will only accept flows to a combined sewer network from an existing connection where betterment is attained.	Comment	The identified lack of capacity at Manningtree WRC is a constraint which must be carefully considered and appropriately addressed to ensure deliverability. The Council notes that the current housing trajectory anticipates delivery between 2028/29 and 2030. Given the relatively modest scale of development proposed, it would not be reasonable or justified to defer delivery beyond 2030 solely on this basis. Notwithstanding this, the policy appropriately requires early engagement with Anglian Water and the preparation of a site-specific foul drainage strategy to confirm capacity, identify any necessary upgrades, and ensure that development can be accommodated without adverse impact on the network. The suggested amendment relating to the betterment of existing combined sewer connections is supported and has been incorporated into the policy

			We request that the policy is amended to include: Existing connections to a combined sewer through redevelopment of a brownfield site, should provide betterment in terms of reduced flows to the combined sewer network. We support measures to reduce the volume of wastewater flows, and we suggest the developer engages with Anglian Water as advised.		and/or supporting text to ensure alignment with Anglian Water's requirements. With these refinements, the Council considers that the allocation is effective, deliverable, and consistent with infrastructure planning requirements and national policy.
358	13554	Historic England (Andrew Marsh, Historic Environment Planning Adviser) [358]	There are no designated heritage assets within the site, but a number lie just outside and adjoin site boundary and may be affected by development within their settings. These include the Manningtree and Mistley Conservation which includes numerous listed buildings. While development at this site is likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA) should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU7.	Comment	A Heritage Impact Assessment (HIA) will be undertaken to inform the policy and confirm suitability, capacity, and mitigation. Policy SAMU7 already requires any development to preserve or enhance the nearby conservation area.
148	14489	Environment Agency (Environment Agency) [148]	As the entire site lies within Flood Zone 3, the introduction of more vulnerable uses such as dwellings should be supported by a Level 2 SFRA to inform the Sequential and Exception Tests, ensuring development is directed to the lowest-risk areas and can be made safe. The SFRA should assess flood hazards, climate change impacts, existing defences, access and emergency planning, and design requirements. The policy should safeguard land for future tidal defences (minimum 16m buffer) and ensure maintenance access. Financial contributions should explicitly support tidal defences, reflecting their importance to the site's long-term sustainability.	Comment	The Council recognises that the site lies wholly within Flood Zone 3 and that this represents a key constraint. The allocation of this previously developed site reflects the Plan's brownfield-first approach, and in this instance, there are likely regeneration benefits that could stem from a sensitive redevelopment of the site, consistent with national policy. The Sequential Test will be applied through plan-making, and a Level 2 SFRA will inform whether the Exception Test can be satisfied. Policy SAMU7 has been strengthened to require a site-specific FRA informed by Level 2 SFRA findings, safe access/egress, resilience measures, emergency planning, and safeguarding of land for tidal defences. The policy already requires the delivery of any site-specific infrastructure identified in the Infrastructure Delivery Plan, which may include flood risk mitigation. With these additional safeguards, the Council considers the allocation capable of being made safe and, therefore, sound, in line with the NPPF.
Businesses, Landowners and Developers					
134	13685	Rose Builders Ltd (Mr Will Vote, Planning	The allocation of this site is strongly supported. Some edits are requested to the level of BNG provision. Further clarity is required on what flood risk mitigation contribution is sought.	Comment	Comment noted. With regard to BNG, the policy reflects the Council's ambition for enhanced biodiversity outcomes – which is consistently applied throughout all relevant policies.

		Manager) [134]			Concerning the clarity around flood mitigation contributions, the precise nature of the requirements will be clarified through the IDP and the Development Management process, ensuring any requirements meet the statutory tests of necessity, proportionality, and direct relevance. The policy already requires contributions in this regard and as per the IDP.
1530	14304	Berrys (Lauren May, Senior Planning Consultant) [1530]	This representation seeks to provide objection to the proposed allocation of Saltings Quarter, Riverside Avenue, Manningtree as a housing allocation for up to 40 houses. The site is entirely located within a Flood Risk Zone 3 and therefore it is our view that the introduction of a vulnerable use class should be avoided. Thus the site should be removed as an allocation.	Object	The allocation represents a previously developed (brownfield) site in a sustainable location, where national policy supports redevelopment where risks can be managed appropriately. The Council will apply the Sequential and Exception Tests, informed by Level 2 SFRA evidence. The development, as set out in the policy, will require robust mitigation, design for resilience, and safeguarding of land for future flood defence infrastructure, and where necessary, financial contributions towards flood risk mitigation. On this basis, and consistent with national policy, the Council considers the site appropriate for allocation subject to safeguards, and the objection is not accepted.
Community Representatives					
953	3538	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1110	4075	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	Lawford Parish Council supports Policy SAMU7. The redevelopment of this site will be a welcome refresh of the whole area that will deliver extra facilities to the ever growing local population, as well as a better shopping experience by relocation the food store to the frontage of Station Road. We would like to have some reassurance that the existing Doctor Surgery also receives a refresh in the way of expanding its services and footprint which sadly is not reflected in the Policy wording as we thought it would, and respectfully ask that this important text is included in SAMU7.	Support	Healthcare provision is addressed through the Infrastructure Delivery Plan and engagement with NHS/ICB partners. The policy already enables contributions toward healthcare infrastructure where required. Whilst it may not be appropriate to prescribe specific upgrades to an individual surgery in policy wording, the Council will ensure that healthcare impacts are assessed and that the appropriate mitigation (including expansion or financial contributions) is secured where justified.
46	13486	Manningtree Town Council (Mrs Ruth Louise Frost, CLERK) [46]	Previously, there was an application made for a new doctor's surgery within the Town and this was refused by TDC and an appeal was upheld by the Secretary of State. - Surely now would be the time for consideration to be given to this again as the current proposal will place further strains on the Healthcare facilities, which can not continue to be ignored. - Manningtree is currently served by two very small TDC operated car parks.	Comment	Healthcare and healthcare provision are addressed through the IDP and as part of the Development Management process through necessary planning obligations. With regard to parking, the policy requires re-provision of parking as part of redevelopment. The Council will ensure that appropriate levels of parking are retained or reconfigured to support the development as a whole having regard to its sustainable location.

			- Kiln Lane, which is often full with visitors to the area. - Market Place, which is often full and unavailable on a Saturday due to the market. -The car park at the Co-Op is essential to the area and is well used by residents, in the area, doing their shopping and accessing the doctors and the shops on the High Street. -What provisions are going to be put in place whilst development is in progress? - There is concern this proposal will cause chaos in the Town whilst this work is taking place and potentially affect the current businesses, which needs to be taken into consideration. -Within the new proposal for this site, is there going to be an increase in parking, as this would be necessary to accommodate the new proposal and needs to be considered. -It is a concern about the increased traffic and the pressure this would put on the existing infrastructure, and the effect on the Community		Construction impacts will be managed through Construction Management Plans at application stage. In terms of traffic implication, the scale of the allocation is relatively modest and impacts will be assessed through planning applications. The Council considers the policy robust and capable of addressing these matters through detailed design, construction management and other safeguards.
Members of the Public					
1071	3756	Mrs Michelle Taylor [1071]	SAMU7 This location as it is a flood plain and therefore housing would be at risk of flooding there is also the issue that this area is real with the co-op and it provides much need car parking for the town. To make this residential will remove the limited car parking we have available especially on busy day. The infrastructure within the town cannot support an additional 40 dwellings (people / vehicles) the surgeries are too small and full, the schools are full and the roads cannot cope with increased volume of traffic especially at the railway bridge.	Object	As set out elsewhere above (and in response to similar concerns raised), flood risk will be addressed through SFRA, Exception Test, and mitigation. Parking will be re-provided as part of redevelopment, and infrastructure impacts will be mitigated through proportionate contributions. The redevelopment of a brownfield site in a sustainable location is considered appropriate in principle, and the allocation remains justified
1123	3824	Mr Terry Dean [1123]	Relocation of Food store. Please ensure that the no. of parking spaces is protected so that there are no fewer than currently available. Currently the parking area is jointly controlled by both The Co-Op and Tendring District Council. Please ensure that there should be no fewer parking spaces after any re-organisartion. Furthermore, ensure that the current free-parking regime continues after any re-organisation.	Comment	Policy SAMU7 will ensure that redevelopment maintains or appropriately re-provides parking capacity, taking account of, amongst other things, relevant policies and guidance governing parking provision and other elements such as operational needs. The policy also ensures redevelopment considers public access and functionality of the town centre. Free parking provision is an operational matter outside the scope of the Local Plan; however, the overall approach ensures the continued vitality and viability of Manningtree.

581	4155	Mrs Sally Webb [581]	With careful consideration and planning this could be a very good improvement.	Support	This is noted and the support is welcomed.
1251	13754	Elizabeth Dunnett [1251]	Manningtree is currently served by two very small TDC operated car parks: Kiln Lane and the Market Place. On a Saturday there is no parking available at the Market Place, as it is the site for the weekly market. The Co-op car park is therefore of high priority on a Saturday, and is very well used at other times, for accessing the High Street shops, cafes, pubs and not least the doctors' surgery. - What provision would there be for parking whilst the development is in progress? - Would any new car park provision match the size of the existing car park? There has been no improvement in healthcare provision in the Lawford, Manningtree, and Mistley area, and traffic is a concern locally.	Comment	This representation is noted. Parking provision will be reconfigured and retained as appropriate, and temporary arrangements during construction will be secured via planning conditions. Healthcare impacts will be addressed through the IDP and planning obligations.
1457	14530	Mrs Fiona Gee [1457]	I appreciate that the government has a need for more house in the area but I feel it necessary to highlight some concerns regarding the local area I live in, that is Manningtree. General Points The traffic build up at pinch points has been getting worse over the years and at peak times, queues build up to unacceptable levels due to the bridge. I know that traffic lights are planned to mitigate the stress, but the sheer volume of traffic will still cause massive problems. The provision of health services in the area is not adequate for the present population, so large numbers of additional people will further strain the services; the same will be true for schools, dentists, fire and police services, which are already struggling.	Comment	The relatively small scale of development at SAMU7 means impacts will be limited and proportionate, and will be mitigated through planning obligations where necessary. The Local Plan strategy seeks to focus development in sustainable locations such as Manningtree town centre, thereby reducing reliance on private vehicles and supporting local services.

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

Summary of Representations

Representations on SAMU7 focused primarily on flood risk, tidal defence requirements, wastewater infrastructure capacity, impacts on healthcare and education provision, parking provision, town centre functionality, heritage considerations, the setting of the adjacent National Landscape, biodiversity requirements and the principle of redeveloping this brownfield site for housing. Whilst some objections were raised regarding the site's location within Flood Zone 3, many respondents supported the regeneration benefits of redevelopment. The Council concluded that the allocation remains appropriate as a sustainable brownfield redevelopment opportunity, subject to robust flood risk assessment, infrastructure mitigation, environmental safeguards and appropriate replacement parking provision. Limited amendments were supported to strengthen policy requirements relating to flood risk, the National Landscape and drainage matters.

In response to representations, changes have been made to Policy SAMU7 and its supporting text. The policy was amended to explicitly require development to conserve and where possible, enhance the natural beauty and setting of the adjacent Suffolk and Essex Coast and Heaths National Landscape, including consideration of building heights, massing, materials and important views, and to ensure development prioritise walking, cycling and public transport, reduce reliance on private car travel.

Flood risk requirements were further strengthened to require a site-specific Flood Risk Assessment informed by the findings of the Level 2 Strategic Flood Risk Assessment, together with safe access and egress arrangements, resilience measures and emergency planning, and additional policy wording was included to safeguard land required for existing and future tidal defence infrastructure and associated maintenance access. Further to this, the supporting text and policy wording were updated to recognise the importance of flood risk mitigation infrastructure and the potential need for associated developer contributions where justified. With regard to infrastructure, the policy and/or supporting text were amended to require betterment where redevelopment utilises existing combined sewer connections, in line with Anglian Water's requirements. The policy was also updated to be more explicit around the extent of infrastructure contributions and land safeguards required to mitigate against development. Separate to the policy and supporting text, supporting evidence was updated through the preparation of a Heritage Impact Assessment to inform mitigation and design considerations relating to nearby heritage assets and the Manningtree and Mistley Conservation Area. However, no changes were made to the scale of development or the allocation itself, as the Council

concluded that the brownfield site remained suitable for redevelopment subject to appropriate safeguards and mitigation. Additionally, no changes were made requiring specific healthcare facilities, parking levels, education infrastructure or highway improvements beyond the existing policy approach, as these matters were considered capable of being addressed through planning obligations, detailed design and the development management process.

Policy SAMU8: Development of Hare Green Garden Village

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3645	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	SAMU8 affects Bridleway 2 and Byway 10, so both routes need protecting, enhancing and integrating into a coherent Multi-User Route (MUR) network. A perimeter MUR would provide safe, segregated movement around the settlement edge, while a central MUR spine would link neighbourhoods, green corridors and the surrounding footpath network, with opportunities for selective upgrades to MUR standard. The Country Park offers an ideal location for a bridleway-grade route, reflecting inclusive models such as Hole Farm, Brentwood. Its scale also creates realistic scope for a community arena, horse and dog activity space, and seasonal rural markets.	Comment	The Council welcomes the constructive suggestions regarding the protection and enhancement of Bridleway 2 and Byway 10 and their integration into a wider multi-user network. Policy SAMU8 already requires additional transport priorities including the provision of a network of footpaths, cycleways and bridleways to enhance permeability within the site and to access the adjoining areas; and other effective integrated measures to mitigate the transport impacts of the proposed development on the strategic and local road network. The Council agrees that the scale of the garden village presents an opportunity to deliver a coherent and inclusive multi-user route (MUR) network, including perimeter and radial routes connecting neighbourhoods and surrounding rights of way. The policy has been strengthened in areas to reflect the protection and enhancement of existing bridleways and byways and the delivery of a connected network of multi-user routes, including within the proposed country park. Detailed design and delivery will be secured through the comprehensive planning framework and masterplanning process.
791	3718	Sport England (Mr Roy Warren, Planning Manager) [791]	A site of approximately 4,500 dwellings is one of the largest allocations in the plan and should make on-site provision for sports facilities. Requirements 16 and 17 of the policy are supported as they make provision for on-site outdoor and indoor sports facilities as well as a network of multi-functional green infrastructure. These requirements should be extended to require an open space, sport and recreation strategy to be prepared to support development proposals which aligns with an approved masterplan in order to provide a strategic framework for considering open space, sport and recreation provision in future planning applications.	Comment	The Council welcomes Sport England's support for the policy's existing provisions. Given the scale of development, the Council agrees that a comprehensive open space, sport and recreation strategy is necessary. The policy will be refined to require such a strategy to be prepared alongside the masterplan/comprehensive planning framework, set out a coordinated framework for indoor and outdoor provision, and align with the latest evidence (e.g. Playing Pitch Strategy and IDP).
349	4326	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	comments made by health partners	Comment	The Council agrees that healthcare infrastructure will need to be planned alongside the delivery of the Hare Green Garden Village. Policy SAMU8 already requires the comprehensive provision of supporting social, physical and environmental infrastructure, with the detailed approach to delivery, phasing and funding to be established through the future Garden Village Development Plan Document (DPD) or similar. The Council will continue to work closely with the Integrated Care Board and other infrastructure providers in preparing the DPD (or similar / updated document title) to ensure healthcare needs arising from the development are appropriately addressed. This will provide the flexibility necessary to respond to the evolving healthcare model and identify the

					most appropriate form of mitigation, including on-site provision and/or financial contributions towards off-site capacity enhancements where justified.
6	13476	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	As advised in our previous consultation response, the development of Hare Green Garden Village at Frating/Great Bromley/Hare Green would need sufficient sewerage infrastructure to serve the development. Currently, the Great Bromley WRC has a long linear catchment serving these villages but does not have capacity to accommodate this level of growth, as it was designed to serve the existing communities and small-scale growth normally associated with these settlements. Garden Villages will only be successful if significant new infrastructure (including sewerage infrastructure) is delivered ahead of new homes. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately, once a PPE is submitted by the developer. Options may include a separate WRC and network to serve the quantum of growth proposed for the Garden Village, if existing infrastructure is insufficient to address the scale of development. Anglian Water agrees, that similar to the approach taken by Tendring and Colchester Borders Garden Community, the Garden Villages should be comprehensively planned, and a development plan document to be prepared containing the relevant policies to facilitate the new community and supporting infrastructure required. Anglian Water fully supports the inclusion of policy clause 18, which aligns with our approach to helping support the delivery of strategic sites. This positively aligns with the Enabling Water Smart Communities framework, which complement the Garden City Principles set out by the Town &Country Planning Association.	Comment	The Council agrees that the scale of development necessitates strategic water infrastructure planning, potentially including a new WRC. Policy SAMU8 already reflects a comprehensive approach aligned with the Garden Communities model, including early engagement and infrastructure-first delivery. The Council supports a phased delivery linked to infrastructure provision, the exploration of strategic solutions (including a new WRC), and alignment with Anglian Water's Enabling Water Smart Communities framework. The requirement for a comprehensive planning framework is an important and necessary safeguard, ensuring coordinated planning and delivery. The policy is therefore justified and deliverable, subject to detailed infrastructure planning, a reequipment which has been secured in the policy through the phasing and master planning mechanisms.
1654	13505	Natural England (Jonathan Burt) [1654]	Natural England welcomes the proposal for a new Garden Village in this location, in line with our comments on the previous Local Plan consultation (Issues and Options), regarding the opportunities to provide sufficient SANG to mitigate for recreational disturbance impacts on the Essex Coast Habitats Sites. Policy SAMU8 should be updated to require a minimum of 86.4ha of SANG. Please note that the site allocation may also be Functionally Linked Land.	Comment	The HRA identifies recreational impacts as a key pathway. Given the large scale, strategic nature of this allocation the Council has agreed to strengthen the policy to specifically require provision of SANGs at an appropriate scale (circa 86.4ha) and require assessment of Functionally Linked Land (FLL) through survey work. These matters will be addressed in detail through the comprehensive planning framework and HRA Appropriate Assessment. This ensures the Plan remains legally compliant and sound.
358	13555	Historic England (Andrew	The site includes the Grade II listed Thickets (LEN 1308664), Oak House (LEN 1337191), Fleece House (LEN 1111450) and Hill House (LEN 1147099). A number of designated heritage assets lie outside	Comment	A Heritage Impact Assessment (HIA) will be undertaken to inform the comprehensive planning framework and confirm capacity and layout, mitigation measures, and opportunities for enhancement.

		Marsh, Historic Environment Planning Adviser) [358]	the site boundary but may be affected by development within their settings. These include the Grade II Beth Chatto Gardens Registered Park and Garden (LEN 1468784); the Grade II listed Thatched Cottage (LEN 1111447), Punders (LEN 1146948) and Forge Cottages, adjoining the forge to the east (LEN 1111446); and the Grade II* listed Copley Dene and wall attached to the left (LEN 1147103). While development at this site is likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA) should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU8.		Moreover, policy SAMU8 already require development to conserve and enhance heritage significance, consistent with the NPPF.
823	13562	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	Whilst reference is made in these policies to the 'provision' of schools, specific land areas need to be stated in the final policies to set appropriate land values (F1 use). Also, the term 'provision' could be misconstrued as a preference for a developer led approach. Reference should be made to the Essex School Organisation Service's guide to Garden Communities and Planning School Places. Note: developments of this size may require additional land for SEND schools/enhanced provision.	Comment	The policy has been updated to ensure the required education land is safeguarded as well as use class reference for education uses included.
823	13568	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The Garden Villages present an opportunity to ensure new neighbourhoods are designed to support healthy ageing and independence for all residents, including older people and people with disabilities and/or mental health needs. Applying inclusive and accessible design principles early will help ensure environments are inclusive for people at all life stages. • The policies do not reference dementia inclusive design principles. Incorporating Essex and national guidance, including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024), would help ensure new neighbourhoods provide clear wayfinding and are easy to navigate for all residents. • The policies do not reference the importance of accessible routes and clear wayfinding, which are essential to support people to move around easily. • Ensuring streets, paths and public spaces are designed to be easy to navigate will support independence and inclusive accessible communities. • Reference to the Essex Design Guide- Inclusive Design would provide clear expectations for inclusive layouts, accessible public realm, and neighbourhood design that supports independence all resident, including older people and people with disabilities and/or mental health needs.	Comment	In respect of the inclusive design comments, the Council supports inclusion of principles from the Essex Design Guide and dementia-inclusive design frameworks. Policy wording has been strengthened accordingly; In terms of Employment integration, the Garden Village strategy seeks to deliver a balanced, self-sustaining community, and further justification/clarification will be provided in supporting evidence/comprehensive planning framework. In respect of NSIPs, the need for co-ordination with strategic infrastructure projects is recognised elsewhere in the Local Plan.

			The Garden Village policies do not reference inclusive or dementia inclusive design principles and do not set expectations for accessible environments. These omissions risk limiting the ability of new neighbourhoods to support independence, inclusive communities and healthy ageing. Next Steps / Alternative Wording “Developments will demonstrate compliance with the Essex Design Guide -Inclusive Design to ensure new housing, neighbourhood layouts and public realm support inclusive, accessible environments for all residents, including older people and people with disabilities and/or mental health needs. Developments will incorporate dementia-inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024). Neighbourhoods will include accessible routes and clear wayfinding to support people to move around easily and independently, promoting inclusive communities.” (Page 213) ECC welcomes the commitment within the policy to prepare a comprehensive Supplementary Plan Document for the Garden Village, ensuring that no planning permissions are granted until the DPD has been adopted and a coordinated, phased approach to delivery is secured. This provides an important safeguard for achieving a landscape led masterplan, ensuring that GI is delivered in step with growth and will help secure a coherent, high-quality GBI network from the outset, integral to the Garden Village’s design and delivery-led masterplan, ensuring that GI is delivered in step with growth quality. Careful consideration should be given to how the proposed new employment space could complement existing provision to boost the overall economy. Major new employment space should also be complemented by appropriate strategic transport improvements and learning provision to ensure that local residents can access new opportunities. These factors are considered important to ensure a robust placemaking approach is followed. It is also recommended that the policy explains / clarifies the rationale for this employment growth and its potential / intended form of uptake / use. This larger Garden Village is located in a challenging, relatively unsustainable location, raising a number of issues to consider carefully. ECC also recommends that consideration is given and referenced in		

			the policy to the relationship, and need for co-ordination with, potential NSIPs as they may affect Tendring and the new Garden Villages. It is particularly positive that the DPD will require 20% BNG, support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map and delivery of multifunctional GI network incorporating existing green assets, a village green, country park, community parks, allotments and well-connected spaces for sport, play and active travel. functional GI network incorporating existing green assets, a village green, country park, community parks, allotments and well connected spaces for sport, play and active travel.		
1710	13625	National Grid (Kevin Roeton, Senior Consents Manager (Onshore Planning)) [1710]	There are several proposed allocations located in close proximity to the Project's Order Limits, as follows: -Housing Allocation MSA20: Land south of Shop Road, Little Bromley, which proposes 17 dwellings. -Strategic Allocation – Mixed Use Allocation SAMU9: Horsley Cross Garden Village, which proposes a housing led mixed use development including up to 6,000 dwellings across plan periods. -Strategic Allocation – Mixed Use Allocation SAMU8: Hare Green Garden Village, which proposes a housing led mixed use development including up to 4,500 dwellings across plan periods. National Grid acknowledges that there is no direct interaction between the above sites and the Norwich to Tilbury Project. We would request that we are kept informed of any changes to these proposed site boundaries There should be no reason why the allocations referred cannot be successfully developed alongside the Norwich to Tilbury Project. However, in order to ensure that this is the case and that developers are aware of the matters to consider when developing in proximity to overhead lines, National Grid strongly recommends that the relevant policies refer to both the Electricity Safety, Quality and Continuity Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines which will assist the developers in this regard. In addition to this National Grid is willing to meet with both the LPA and the site developers to discuss the development of the sites to ensure a mutually beneficial outcome.	Comment	The Council notes that no direct conflict is identified. The comment around the 'Electricity Safety, Quality and Continuity Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines' is noted and reference to these regulations and aware making will be included in section 7 of the Local Plan where reference is made to power lines.
1656	14339	Tarchon Energy (Stuart Livesey, Development	Tarchon supports the Local Plan process and highlights the need to account for the Tarchon Interconnector Project, a nationally significant energy scheme within Tendring. The Project is progressing through defined stages, with an identified search area that currently overlaps with several proposed allocations, including	Comment	The Plan will retain flexibility to ensure that the allocations, including the allocations mentioned in the comment, can proceed alongside nationally significant infrastructure having regard to the level of advancement of the DCO application of the relevant NSIP, with detailed considerations

		Director) [1656]	SAMU5, SAMU8 and SAMU9. Given its national policy support and infrastructure importance, it is considered essential that the Local Plan allows flexibility to accommodate its delivery. Ongoing coordination with the Council is recommended to manage interactions between proposed development sites and the Project's evolving footprint. (PLEASE SEE ATTACHED DOCUMENT FOR FURTHER INFORMATION)		addressed through the comprehensive planning framework and development management process.
48	14363	Essex Police [48]	Strategic Policy SAMU8: Development of Hare Green Garden Village At F. Community Infrastructure insert a new paragraph 18. As follows "Increased police, fire & rescue and ambulance capacity to be provided to serve the new development. This could be by means of new on-site infrastructure; an improvement, reconfiguration, extension or relocation of existing police, fire & rescue and ambulance facilities; or through financial contributions to enhance the delivery of new police, fire & rescue and ambulance facilities in the locality."	Object	The policy has been updated to reference police, fire and ambulance provision, ensuring clarity in infrastructure delivery expectations.
148	14490	Environment Agency (Environment Agency) [148]	Updates to the Flood Map for Planning from the Environment Agency's NaFRA2 project (March 2025) have identified additional areas of Flood Zones 2 and 3 within the broad site boundaries. An updated SFRA is recommended to reflect these changes, support a robust Sequential Test, and guide the layout of development to avoid flood risk areas at Hare Green Garden Village. The draft policy should also include a requirement to avoid identified flood risk areas, aligning with NPPF paragraphs 172, 173 and 181(a), and reinforcing the principle of directing development to the lowest-risk parts of the site.	Comment	The SFRA has been updated to incorporate NaFRA2 data and will inform the application of the Sequential Test where needed and masterplanning (which is a requirement of this policy) to direct development away from higher-risk areas. The Local Plan already contains other policies requiring new development to avoid flood risk areas where possible and to ensure development is safe for its lifetime.
826	14497	Essex Wildlife Trust (Annie Gordon) [826]	We have significant concerns about the ecological sustainability of the Hare Green Garden Village allocation. The site is located at the A120/A133 interchange in the parishes of Frating and Great Bromley, in a predominantly rural agricultural landscape with few existing settlement features. The HRA Screening Report has assessed this allocation at Category C — the highest level of HRA concern — with potential LSE on the Colne Estuary SPA, SAC and Ramsar site and the Essex Estuaries SAC across multiple impact pathways including disturbance to functionally linked land, water quality, and air quality. The ISA Annex C assessment identifies uncertain or negative impacts on landscape character, biodiversity features, and agricultural land quality. We note that the allocation policy (SAMU8) contains positive ecological requirements, including a 20% BNG requirement, a commitment to enabling and supporting LNRS priority habitat measures, a requirement for RAMS contributions, and a specific requirement for wintering bird surveys at the appropriate time of year, with the proviso that any habitat creation for SPA birds must be fully functional before development affecting those species can	Comment	The Council acknowledges the ecological sensitivity of the site and welcomes support for key policy measures. The Council has strengthened requirements to include pre-comprehensive planning framework ecological surveys, including FLL assessment and wintering bird surveys, a landscape-scale GI masterplan aligned with the LNRS, and clarification of water quality requirements, including consideration of nutrient neutrality where necessary.

			proceed. These are appropriate requirements and we support their inclusion. However, given the scale of this allocation and its proximity to internationally designated sites, we are concerned that the ecological requirements are insufficient as presently drafted. No pre-submission ecological surveys have been carried out for this site, and the wintering bird survey requirement is deferred to the DPD stage. Given that the Colne Estuary SPA and Essex Estuaries SAC are directly relevant to this site, it is essential that comprehensive pre-AA ecological surveys — including wintering bird surveys, Phase 1 habitat surveys, protected species surveys, and a FLL habitat assessment — are completed and their findings reflected in the DPD before any planning consents are granted. The Trust requests that the plan includes an explicit requirement to this effect. The requirement for a new Water Recycling Centre (WRC) before first occupation is a welcome and necessary requirement. However, the policy does not specify that the WRC must achieve at minimum a nutrient-neutral or better-than-neutral discharge standard to the receiving watercourse and estuary system. Given the sensitivity of the Colne Estuary SAC to nutrient enrichment, this is an essential safeguard and should be stated explicitly. We recommend that this is addressed both in the DPD requirements and in the AA. We are also concerned that the GI requirements for this allocation are generic rather than site-specific. The policy refers to 'a network of multi-functional green infrastructure' and a 'country park to the west,' but does not specify that the GI masterplan must be aligned with LNRS strategic opportunities or that it must demonstrate ecological connectivity at a landscape scale. Given the scale of this development and its potential to either fragment or enhance the rural ecological network, a requirement for a landscape-scale GI masterplan — developed with reference to the LNRS and in consultation with the Trust and other relevant stakeholders — should be included as a prerequisite of the DPD.		
Businesses, Landowners and Developers					
63	4015	Colchester Natural History Society (Mr Peter Hewitt, Planning Officer) [63]	There will be a need to effectively protect the nearby LWS. It must be recognised that the Garden Village will largely obliterate green farm land that in its own right contributes to wildlife and the green environment.	Object	The Council recognises concerns regarding loss of agricultural land and ecological impacts. The Garden Village approach enables strategic, landscape-led planning including significant biodiversity enhancements (minimum 20% BNG) as well as the creation of large-scale green infrastructure. The Council considers that, overall, the allocation is capable of delivering net environmental benefits consistent with national policy.
63	4019	Colchester Natural History Society (Mr	It will be necessary to protect the nearby LWS. It must be recognised that development of open green farm land will largely obliterate land that in its own way is supportive of wildlife and green habitats.	Comment	See above.

		Peter Hewitt, Planning Officer) [63]			
705	4098	Mr Peter Le Grys [705]	Arbitrary and ill-conceived development in the middle of nowhere. There are no definitive boundaries nor historical presumption in placing an overdeveloped 'garden village' in the countryside.	Object	The spatial strategy has been informed by sustainability appraisal and evidence. Garden Communities enable comprehensive, infrastructure-led growth, reduce pressure on existing settlements, and deliver significant community benefits. The Council considers that without such allocations, housing needs could not be met in a sustainable and coordinated manner, and therefore the allocation is justified and positively prepared.
1406	4346	The MacDonald Family (Ravens Green) [1406]	Our client's land to the northeast of the A133, near Ravens Green, is available, achievable and suitable for a modern employment development and associated greenspace, as part of the wider Hare Green Garden Village. Our clients support the allocation of a new Garden Village in Policy SAMU8 and are keen to be actively involved in the preparation of a specific DPD for the Hare Green Garden Village. There is a minor typographical error in Strategic Policy SAMU8 which refers to the broad area shown on 'Map SAMU7'. This should read 'Map SAMU8'.	Support	Noted.
1409	4371	The MacDonald Family (Frating) [1409]	Our client's land to the south of Colchester Road, Frating, is available, achievable and suitable for additional modern employment development and associated greenspace, as part of the wider Hare Green Garden Village. Our clients support the allocation of a new Garden Village in Policy SAMU8 and are keen to be actively involved in the preparation of a specific DPD for the Hare Green Garden Village. There is a minor typographical error in Strategic Policy SAMU8 which refers to the broad area shown on 'Map SAMU7'. This should read 'Map SAMU8'.	Support	Noted.
431	4463	Welbeck Strategic Land [431]	The Hare Green Garden Village allocation should be deleted and replaced by housing allocations at existing settlements elsewhere in the District	Object	The spatial strategy has been informed by sustainability appraisal and evidence. Garden Communities enable comprehensive, infrastructure-led growth, reduce pressure on existing settlements, and deliver significant community benefits. The Council considers that without such allocations, housing needs could not be met in a sustainable and coordinated manner, and therefore the allocation is justified and positively prepared.
1462	4490	Latimer (Tendring Colchester Borders Garden Community)	Latimer has no objection in principle to the Garden Village allocation, however, would want to be assured through the allocation that there would be no detrimental impact on the TCBGC and that the allocation proportionally contributes to proposed infrastructure (e.g. the Infrastructure Delivery Plan evidence base document identifies that there is an absence of secondary schools	Object	The Council acknowledges the need to ensure no adverse impact on TCBGC. Infrastructure planning is being considered across the wider area through the IDP. The Garden Village will be required to deliver its own infrastructure where necessary and contribute proportionately where shared infrastructure is justified.

		Developments Limited [1462]	and the garden village will likely be dependent on facilities within the TCBGC. Suggested amended wording is provided.		
853	13664	Taylor Wimpey [853]	On the basis of the multiple land interests and the significant infrastructure requirements, a coordinated approach will be required to ensure the development comes forward in an efficient and pragmatic way. The appetite for development / associated programme of the relevant landowners is not known.	Comment	The Council agrees that coordinated delivery is essential. The requirement for a DPD/comprehensive planning framework and comprehensive masterplan is specifically intended to address land assembly, phasing, and delivery. This provides a robust mechanism to ensure effective implementation.
1530	14305	Berrys (Lauren May, Senior Planning Consultant) [1530]	We strongly object to the Hare Green Garden Community (SAMU8) which the Local Authority seek to allocate for around 4,500 homes as well as the provision of 70-80ha of employment land. We disagree with the principle of providing the majority of the plan period's housing within three garden communities which will all require a significant amount of infrastructure and other investments to enable them to come forward. It is unclear how necessary highway and other infrastructure improvements would be provided and funded and therefore at this stage we believe that the proposed housing numbers should be removed from the housing trajectory for the entire plan period.	Object	The spatial strategy has been informed by sustainability appraisal and evidence. Garden Communities enable comprehensive, infrastructure-led growth, reduce pressure on existing settlements, and deliver significant community benefits. The Council considers that without such allocations, housing needs could not be met in a sustainable and coordinated manner, and therefore the allocation is justified and positively prepared.
601	14386	Edward Gittins and Associates (Mr Edward Gittins, Chartered Town Planner) [601]	We register support for the Broad Location for the Hare Green Garden Community. We consider the need to provide context for growth in the form of a Spatial Strategy. We advocate the promotion of a Stage 1 Development Area for land in the Broad Location lying west of the B1029 to be based on a Master Plan. We set out the community benefits that would accrue from early development coming forward in advance of a DPD within a Stage 1 Development Area.	Comment	Noted.
Community Representatives					
953	3539	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1712	14240	Bernard Jenkin [1712]	The proposed new standalone garden community settlements are reasonably small, but they are unlikely to be as financially viable as urban extensions. This is because the infrastructure for these developments will have to be built from scratch. Labour's eco towns failed, and the garden communities struggle in practice as we both know too well.	Comment	The Council notes the concerns regarding viability. The evolving evidence base for the Local Plan includes viability and delivery assessments demonstrating that the proposed Garden Communities are capable of being delivered, including with the necessary infrastructure. The policy requires the development to be phased which will assist in delivering the necessary infrastructure through a masterplanned approach which also provides a framework to ensure phased and coordinated delivery.
1175	14442	ONTRACK Tendring Transport Users (John	This development is unfortunately remote from any railway station so that public transport will be dependent upon bus services, currently along the A133 Clacton – Colchester route. Considerable improvements in services will be needed	Comment	Improvement to infrastructure including public transport services has been secured through IDP, comprehensive planning framework and planning obligations, with a clear infrastructure-first approach.

		Smock) [1175]			
799	3817	Frating Parish Council (Cllr Paula Bland) [799]	As a Parish Council we are objecting to the proposed Garden Village at Hare Green. If, however, this is to go ahead then the DPD must be prepared and adhered to with much of the infrastructure being in place prior to the housing being built.	Comment	These concerns are noted, as set out elsewhere in response to similar concerns, the comprehensive planning framework is a critical mechanism to ensure comprehensive planning and infrastructure-first delivery, and this requirement is retained.
262	5229	Great Bromley Parish Council (Lizzie Ridout, Clerk) [262]	Hare-Green Garden Village could affect protected lanes, the rural landscape and heritage assets and may exacerbate existing drainage and flooding problems. There should be clearer mapping, phasing and robust flood-risk mitigation measures.	Comment	There are firm requirements in place for a masterplanned approach to ensure a well integrated Garden Village, as well as the preservation of protected lanes and heritage assets. Flood risk and surface water flooding will be addressed through SFRA and sequential design.
Members of the Public					
1349	4002	Mrs Jenny Willson [1349]	Frating area new garden village objection 1. Top-quality agricultural land is within the boundary. 2. Locals rely on land-fed wells, which would be in danger of drying up. 3. Local GP surgeries are already full. This area has previously been subject to similar applications, the last one was rejected by the government planning inspector, why should this be allowed to be reconsidered.	Comment	The Council acknowledges concerns regarding loss of high-quality agricultural land, reliance on private water sources, and pressure on healthcare services. The site selection process has considered agricultural land classification alongside wider sustainability objectives. The Garden Village approach allows for comprehensive planning, including substantial green infrastructure and long-term environmental enhancements. Potential impacts on water resources will be assessed through detailed hydrological and environmental studies at the comprehensive planning framework and planning application stages, with appropriate safeguards secured. Healthcare provision is addressed through the IDP specifically requiring the delivery of new or expanded facilities. Previous proposals in the area were considered under different policy, housing needs figures and evidence contexts. The current allocation reflects updated evidence base and an updated strategic approach to growth having regard to up to date housing needs based on the new standard methodology (for calculating housing needs).
964	3456	Mr James Critchley [964]	Tendring needs new homes, but they should not be built in areas without strong public transport. Proposals rely on bus based rapid transit, yet buses do not encourage people to give up cars because they can be easily withdrawn, unlike rail or tram services. Recent government guidance and the 2025 NPPF emphasise building homes around railway stations. Analysis by Russell Curtis highlights underused land near rural stations such as Great Bentley, Alresford, Weeley and Thorpe-le-Soken. Prioritising higher density housing around these stations would use existing transport, improve travel choice and potentially increase rail services through higher demand.	Object	Rail-based development is supported where feasible and as demonstrated in the strategic approach to growth as set out in the Local Plan, however given the number of new homes required now it is not realistic for all growth to be directed solely to rail station locations. Garden Villages are intended to deliver comprehensive, transport-led development, including bus rapid transit, active travel networks, and reduced car dependency through mixed-use design. The scale of SAMU8 enables critical mass to support high-quality public transport provision that smaller sites could not sustain.
986	3611	Mr Bradley Stokes [986]	I object to the proposed Garden Villages at Hare Green, Horsley Cross and Weeley. The plan does not provide clear, guaranteed delivery of essential infrastructure such as roads, schools, GP services and drainage before housing is occupied. These locations are not major employment centres, making car dependency likely despite references to sustainable travel. The scale of development	Object	Policy SAMU8 explicitly requires appropriately phased infrastructure-first delivery, secured through a comprehensive planning framework and planning obligations; provision of schools, healthcare, transport and utilities aligned with growth; and a comprehensive masterplanned approach to mitigate impacts.

			would significantly harm the rural character, result in loss of countryside and agricultural land, and place further pressure on already stretched local services. The proposals should be reconsidered in favour of smaller-scale, infrastructure-led and brownfield development.		The Garden Village approach is specifically intended to overcome the piecemeal and cumulative impacts associated with relying solely on dispersed smaller sites.
1066	3753	Mr Gavin Tuff-Lacey [1066]	The idea of Garden Villages to prevent over development of rural settlements is sound. But these should not be planned in areas of existing settlement where current residents will be impacted and adapted infrastructure will be a compromise. New locations should be strategically chosen to develop genuinely new communities with new infrastructure.	Object	The chosen location reflects a strategic balance of constraints and opportunities, including proximity to strategic roads and ability to create a new, self-sustaining community. The Garden Village is not an extension of a single settlement but a new planned community, delivered through a comprehensive planning framework.
1125	3831	Mr Derek Anderson [1125]	Frating is not suitable for mass housing on this proposed scale as there is no infrastructure or public transport system to support it. This idea to build thousands of homes at this location is sadly not a new one. It was proposed nearly 25 years ago before being dumped due to unsuitability of location. This proposal, if it goes ahead will destroy the community spirit of the villages involved and blighten the lives of residents, with no benefits being provided	Object	The Garden Village will be supported by new infrastructure delivered alongside development, including transport, schools and community facilities. The scale of development enables this infrastructure to be viably delivered. Previous proposals are not directly comparable, as the current allocation is part of a coordinated Local Plan strategy supported by updated evidence and a significant increase in housing need through the new standard methodology calculation.
1352	4082	Mrs Paula Bland [1352]	SAMU1 needs to be well on the way to being completed prior to SMAU8 being started. This will be the only way to know the impact that SAMU1 has on the local environment, road systems, Colchester hospital, schools etc and to establish if SAMU8 is really needed and with what infrastructure. East Colchester is already gridlocked for much of the day.	Comment	The Council recognises concerns regarding the timing of development relative to other strategic sites. The Local Plan includes a **phased trajectory**, and SAMU8 will be delivered over the longer term and much later into the local plan period as set out in the latest housing trajectory. The requirement for a comprehensive planning framework ensures that development will not proceed until a comprehensive framework is in place. Infrastructure capacity and cumulative impacts will be assessed across the Plan area. The Council does not consider it necessary or appropriate to delay SAMU8 pending completion of other allocations, but will ensure coordinated delivery through phasing and infrastructure planning.
581	4156	Mrs Sally Webb [581]	Too much development and use of viable farm land.	Object	The spatial strategy seeks to balance growth with environmental protection. While some loss of agricultural land is unavoidable, the Garden Village approach allows for significant environmental mitigation and net gains, including extensive green infrastructure and biodiversity enhancement.
1391	4269	Mrs Laurence Dewey [1391]	This proposal represents an unsustainable form of development that prioritises scale over suitability, The negative impacts on road infrastructure, environment, biodiversity, loss of wildlife habitat and loss of character significantly outweigh any potential benefits. The potential benefits mentioned are defined in a very vague way, nothing concrete is set out in terms of type of transport, or attracting	Comment	The Garden Village model is specifically intended to deliver scale-led infrastructure alongside the growth that will be forthcoming, environmental enhancements, and ultimately the establishment of a sustainable community. This cannot be achieved through smaller dispersed sites. Detailed requirements for transport, green infrastructure, employment provision and mitigation are set out in the policy and will be refined through the comprehensive planning framework.

			major industry. The loss of agricultural land is not desirable and goes against the principle of sustainability. It is an irreversible act. I urged the planning authority to reject this application in its current form.		
969	4475	Mr Scott Gilmour [969]	It is unfortunate to see such extensive development outside of the many existing stations present in Tendring. However with the provision of rapid transport, hopefully those concerns are alleviated. With an emphasis on alternate modes of transport for journeys within town. Hopefully it can follow TCBGC's design to incorporate a mixture of housing stock and sustainable infrastructure to allow for a higher quality of life. Ensuring residents are not dependent on a car for travel is essential for this as well.	Comment	Policy SAMU8 places strong emphasis on sustainable transport, mixed-use development and reduced car dependency, informed by the approach taken at TCBGC. These principles will be embedded through the comprehensive planning framework and masterplan to ensure a high-quality, sustainable community.
822	4488	Rachel Fletcher [822]	No thanks	Comment	The Council notes the comment stating no to this garden village allocation. The allocation forms part of a wider strategy to meet objectively assessed housing needs in a coordinated and sustainable manner.
1102	13701	Mr Gerald Lewis [1102]	I would like to strongly object to the Hare Green Planning Proposals (SAMU8) The infrastructure in Frating cannot cope with its present structures without an additional 4500 houses being forced upon us. Bromley Road floods with the slightest of rain with damages to drains by heavy traffic, particularly from Pallet Plus. Sewerage facilities cannot cope with the present structures with recent blockages which have had to be cleared by Anglian Water. Our present road facilities cannot cope now, 7500 houses in Elmstead and 4500 in Frating and Hare green will cause total chaos and many more accidents. There are blockages on the A12 every other day already. Please cancel this project proposal, I moved to Frating to live a rural area overlooking farmland, not a housing estate.	Object	The Council acknowledges concerns regarding drainage, highways and infrastructure capacity. These matters are central to the Garden Village approach and will be addressed through new and upgraded infrastructure secured via the comprehensive planning framework and planning obligations; strategic transport assessments and mitigation; and comprehensive drainage strategies, including new wastewater infrastructure where required.
752	13739	Mr Christopher Walpole [752]	The proposed Frating/Hare Green development is unsustainable due to inadequate infrastructure and services. Major road links (A12 and A120) are already congested, with planned improvements cancelled, and large-scale housing would significantly worsen traffic. Local hospitals, GP surgeries, and schools are struggling to meet current demand and could not cope with further population growth. The development would also result in the loss of high-quality farmland and cause severe ecological harm. Existing flooding problems would likely intensify. Overall, the proposals would exacerbate social, environmental, and infrastructure pressures and should be opposed.	Object	These issues are addressed through the Plan's evidence base, including transport modelling, HRA and IDP. The Garden Village will deliver its own infrastructure and contribute to strategic improvements. While impacts are acknowledged, the Council considers that they can be appropriately mitigated through a coordinated, plan-led approach.
814	13752	Kate Hodgkiss [814]	Hare Green proposal for 4500 homes: again, this is a massive development that would have huge negative impacts on existing infrastructure and facilities. The effects of its proximity to the	Object	Cumulative effects, including with other strategic allocations and infrastructure projects, are being assessed through the Sustainability Appraisal, HRA and transport modelling which collective form key parts

			proposed Horsley Cross development and NSIPs needs to be considered cumulatively.		of the evidence base. The NSIPs that will affect the Tendring Peninsula are all Nationally Significant Infrastructure projects and therefore subject to the Development Consent Order (DCO) process where wide-ranging matter, including cumulative impacts, are considered (as part of that process, having regard to multiple factors including the growth planned for in the area's local plan). Moreover, other policy safeguards and the comprehensive planning framework will ensure coordinated delivery and mitigation of the garden village allocation.
966	13786	Amy Pankiewicz [966]	Objection to Hare Green Garden Village, arguing it is premature and unnecessary given the nearby Tendring Colchester Borders Garden Community, which is not yet built or occupied and whose infrastructure delivery remains uncertain. Concerns are raised about oversupply, limited local employment, and competition between multiple proposed garden villages. The development would destroy historic hamlets and harm the rural character of surrounding villages, as well as lead to the loss of high-quality agricultural land. Transport proposals are considered inadequate, likely increasing car dependency, congestion on the A120/A133, and pressure on already overstretched facilities such as Colchester Hospital.	Object	The Local Plan strategy requires multiple sources of supply to meet housing needs over the plan period. SAMU8 is a long-term allocation, with development dependent on adoption of a comprehensive planning framework and delivery of infrastructure. The Council considers that the Garden Village complements rather than duplicates other strategic developments, and that sufficient safeguards are in place to ensure coordinated and infrastructure-led delivery.
1456	13829	Michael Willett [1456]	My response to the proposed Frating development of 4,500 homes is that it is wholly disproportionate to a village of 622 people and would overwhelm and fundamentally change its rural character. People choose to live in such settings, and their concerns should not be dismissed. There is doubt that the development will benefit local families, with "affordable" housing unlikely to materialise and homes instead benefiting investors. The scale of construction would cause major disruption, and the environmental cost, particularly from extensive concrete use, raises serious concerns. Overall, the proposal risks damaging the character and sustainability of the area.	Comment	The Council recognises concerns regarding scale and rural character. The Council acknowledge and agrees that the Garden Village will represent a significant change; however, this is inherent in meeting housing needs in a plan-led way. The policy requires landscape-led design, retention of key features, and high-quality placemaking. Affordable housing provision will be secured in accordance with policy requirements.
1250	13835	SJ Potter [1250]	I am aware that we need more housing in the UK and that you say the infrastructure will be put in at the appropriate time . But with the amount of new homes that have already been built the present infrastructure is collapsing, our doctors is in Great Bentley but unless you are able to walk there you are unable to go alone you have to drop the patient off and then wait on the local housing estate until they have finished This will get a lot harder when Bentley put in red lines this scenario is the same at Colchester general hospital. Great Bentley station is only usable if you are not within walking distance or able to be dropped off as again there is no parking available. There are homes in Frating that because of the out of date drainage system cannot use their bathrooms and the children's play area has been covered in sewage during bad weather. The local school is full. The traffic lights in Frating need a new sequence system because of the train gates at Thorrington traffic is held up but the traffic light sequence is wrong it can take 15 minutes or more to get through. We already have a very large of new housing development taking place in nearby Elmstead Market which	Comment	The Local Plan adopts an infrastructure-first approach, and development at SAMU8 will not proceed without the necessary supporting infrastructure. Existing issues highlight the need for coordinated, strategic investment, which the Garden Village approach seeks to deliver.

			impact greatly on the area and feel that the infrastructure and amenities should be put in place now before considering more housing.		
643	13858	Mrs Marion Ardley [643]	I OWN LAND AND I AM THE LAND OWNER AND HAPPY TO BE DEVELOPED. IT IS TOO SMALL FOR FARMING DUE TO SIZE OF PLOT. TO WHOM IT MAY CONCERN. I REFER TO SAMU8 HARE GREEN GARDEN VILLAGE. MY FAMILY HAVE OWNED LAND IN THE VILLAGE OF GT. BROMLEY FOR OVER 100YEARS AND I HAVE BEEN LEFT WITH A 3 ACRE PLOT WHICH I WOULD LIKE INCLUDED IN THE SAMU8 HARE GREEN GARDEN VILLAGE. THE FIELD WAS ORIGINALLY 40ACRES UNTIL THE A120 WAS OPENED IN 1982 LEAVING THE APPROX 3 ACRES IN BACK LANE EAST WHICH IS TOO SMALL TO BE FARMED.	Support	The Council notes the landowner's interest. Detailed site boundaries and land assembly will be considered through the comprehensive planning framework. It is unclear whether the land referred to has been put forward for consideration as a part of the two 'call for sites' exercises however any inclusion of additional land will be assessed against planning, environmental and infrastructure considerations.
1487	14006	Oliver Morgan [1487]	In summary, I object to Policy SAMU8 as currently drafted. If it is to be taken forward, significantly stronger safeguards and clearer evidence are required to ensure that the development is properly planned, phased and does not result in unacceptable impacts on existing communities.	Object	Policy SAMU8 already includes significant requirements relating to infrastructure, environment, phasing and delivery. These will be further refined through the comprehensive planning framework to ensure a robust and comprehensive framework.

Policy SAMU8: Development of Hare Green Garden Village

Summary of Representations

A number of representations were received from statutory consultees, infrastructure providers, technical stakeholders, community organisations and members of the public in relation to SAMU8 (Hare Green Garden Village). Whilst the Council considers the allocation to be justified and deliverable, several constructive suggestions were accepted and have been reflected through amendments to the policy and supporting text to strengthen infrastructure planning, environmental protections, accessibility, health provision and delivery requirements.

In response, changes have been made to Policy SAMU8. Policy wording was strengthened to require the protection and enhancement of existing bridleways and byways and the delivery of a connected multi-user route network, including within the proposed country park. A requirement was added for a comprehensive Open Space, Sport and Recreation Strategy to be prepared alongside the masterplan/comprehensive planning framework and aligned with relevant evidence. The policy was also strengthened to require provision of Suitable Alternative Natural Greenspace (SANG) at an appropriate scale for the allocation (circa 86.4ha) and assessment of Functionally Linked Land (FLL). Ecological requirements were strengthened to require pre-comprehensive planning framework ecological surveys, including wintering bird surveys and FLL assessment, together with a landscape-scale green infrastructure masterplan aligned with the Local Nature Recovery Strategy (LNRS). In addition to this, the policy was amended to clarify requirements relating to water quality, including consideration of nutrient neutrality where necessary. With regard to infrastructure, requirements relating to education provision were strengthened by clarifying land requirements for schools, including SEND provision, informed by Essex County Council's comments, guidance and IDP evidence. A reference to the need for police, fire, and ambulance infrastructure, as well as additional healthcare capacity was added to the policy wording and supporting evidence, and detailed provision will be addressed further through the comprehensive planning framework. Reference was also added to ensure the appropriate coordination with Nationally Significant Infrastructure Projects (NSIPs) is provided alongside development. Apart from this, policy wording was strengthened to incorporate inclusive and dementia-inclusive design principles, including accessible routes, wayfinding and reference to the relevant Essex design guidance. A requirement was also included for a Heritage Impact Assessment (HIA) to inform capacity, layout, mitigation and enhancement measures. A typographical error was corrected, replacing the reference to 'Map SAMU7' with 'Map SAMU8'.

Policy SAMU9: Development of Horsley Cross Garden Village

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3646	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	SAMU9 directly affects Bridleway 13 at the northern edge, so this route needs protecting, enhancing and integrated into a wider Multi-User Route (MUR) for pedestrians, cyclists and horse riders. The surrounding footpath network offers strong potential for connections and selective upgrades to MURs, supporting safe, inclusive movement across the site and into nearby settlements. The suggested country park would provide a natural location for a bridleway-grade MUR, ensuring traffic-free access for all users and reflecting inclusive models such as Hole Farm in Brentwood. The site scale also creates scope for a multi-functional community arena, horse/dog activity space, and seasonal fairs/markets.	Comment	Policy SAMU9 already requires provision of a comprehensive network of walking, cycling and bridleway connections. The Council agrees that the scale of the Garden Village presents an opportunity to deliver a coherent, inclusive multi-user route network, including integration of Bridleway 13, wider connections, and provision within the proposed country park. The policy will be strengthened to reflect the protection and enhancement of existing routes and the delivery of a connected multi-user network. Detailed design and delivery will be secured through the comprehensive planning framework (CPF) and masterplanning process.
791	3719	Sport England (Mr Roy Warren, Planning Manager) [791]	A site of approximately 6,000 dwellings is the largest allocation in the plan and should make on-site provision for sports facilities. Requirements 16 and 17 of the policy are supported as they make provision for on-site outdoor and indoor sports facilities as well as a network of multi-functional green infrastructure including a country park. These requirements should be extended to require an open space, sport and recreation strategy to be prepared to support development proposals which aligns with an approved masterplan in order to provide a strategic framework for considering open space, sport and recreation provision in future planning applications.	Comment	Given the scale of development, the Council agrees that a comprehensive open space, sport and recreation strategy is necessary. The policy will be refined to require such a strategy to be prepared alongside the masterplan/comprehensive planning framework (CPF), set out a coordinated framework for indoor and outdoor provision, and align with the latest evidence (e.g. Playing Pitch Strategy and IDP).
349	4328	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Comments by health partners	Comment	Given the scale of development, healthcare infrastructure will form a key component of the Garden Village. Policy SAMU9 already provides for on-site community infrastructure, and this will necessarily include healthcare provision commensurate with population needs, informed by the IDP and ongoing engagement with the ICB. Infrastructure delivery will be secured through the comprehensive planning framework and planning obligations.
6	13477	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor –	A new Garden Village at Horsley Cross is not in a location close to an existing WRC catchment and will require a wastewater treatment solution specifically for this settlement, given the quantum of growth proposed in this location – up to 6,000 homes and 50-60ha of employment land. Garden Villages will only be successful if significant new infrastructure	Comment	The Council agrees that a strategic wastewater solution, likely including a new WRC, will be required. Policy SAMU9 reflects an infrastructure-first approach and will ensure phased delivery aligned with infrastructure provision, early engagement with Anglian Water and development dependent on delivery of required infrastructure.

		Sustainable Growth) [6]	(including sewerage infrastructure) is delivered ahead of new homes. This SAMU would be assessed through our approach to strategic sites, to enable growth to be phased appropriately, once a PPE is submitted by the developer. This will most likely include a separate WRC and network to serve the quantum of growth proposed for the Garden Village, as there is no existing infrastructure to address the scale of development. Anglian Water agrees, that similar to the approach taken by Tendring and Colchester Borders Garden Community, the Garden Villages should be comprehensively planned, and a development plan document to be prepared containing the relevant policies to facilitate the new community and supporting infrastructure required. Anglian Water fully supports the inclusion of policy clause 18, which aligns with our approach to helping support the delivery of strategic sites. This positively aligns with the Enabling Water Smart Communities framework, which complement the Garden City Principles set out by the Town &Country Planning Association.		The comprehensive planning framework requirement is a critical safeguard ensuring deliverability.
1654	13507	Natural England (Jonathan Burt) [1654]	Natural England welcomes the proposal for a new Garden Village in this location, in line with our comments on the previous Local Plan consultation (Issues and Options), regarding the opportunities to provide sufficient accessible semi-natural greenspace to mitigate for recreational disturbance impacts on the Essex Coast Habitats Sites. It will require 115.2 ha of SANG across the Garden Village. SANG will need to be delivered in phases, ensuring that the quantum of SANG open to new residents remains ahead of the occupation of new dwellings, using the 8ha/1000 new population metric. A noise assessment will need to be undertaken.	Support	The Council welcomes support and agrees that SANG provision is critical. The policy will be strengthened to require SANG provision at an appropriate scale in accordance with Natural England requirements (there will be a masterplanning stage as well as a planning application to be submitted through the Development Management procedure (under the Town and Country Planning Act 1990). The updated policy also ensures phased delivery ahead of occupation. These measures ensure compliance with the Habitats Regulations and the Plan remains legally sound.
358	13556	Historic England (Andrew Marsh, Historic Environment Planning Adviser) [358]	The site includes the Grade II listed Abbot's Hall (LEN 1261150), Pear Tree Cottage (LEN 1240608), Holly Tree Cottage (LEN 1240504), and Hempstall's Farmhouse (LEN 1240504). A number of Grade II listed buildings lie outside the site boundary but may be affected by development within their settings. While development at this site is likely to be achievable in heritage terms, the nature and significance of any impacts remain uncertain at this stage. A Heritage Impact Assessment (HIA) should therefore be undertaken in advance of Regulation 19 to confirm whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, we would expect any mitigation and enhancement measures to be incorporated into Policy SAMU9.	Comment	A Heritage Impact Assessment (HIA) will be undertaken to inform the comprehensive planning framework, including site capacity and layout. mitigation measures, and enhancement opportunities. In addition, Policy SAMU9 requires conservation of heritage significance, ensuring consistency with national policy.
823	13563	Essex County Council (Rich	Whilst reference is made in these policies to the 'provision' of schools, specific land areas need to be stated in the final policies to	Comment	This representation is noted. Education land requirements (including SEND) will be clarified in the policy, and employment and infrastructure

		Cooke, Principal Spatial Planner) [823]	set appropriate land values (F1 use). Also, the term 'provision' could be misconstrued as a preference for a developer led approach. Reference should be made to the Essex School Organisation Service's guide to Garden Communities and Planning School Places. Note: developments of this size may require additional land for SEND schools/enhanced provision.		integration will be further justified and clarified in supporting evidence/ the comprehensive planning framework. The requirement for a comprehensive planning framework provides a robust mechanism to ensure coordinated, infrastructure-led delivery.
823	13569	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The Garden Villages present an opportunity to ensure new neighbourhoods are designed to support healthy ageing and independence for all residents, including older people and people with disabilities and/or mental health needs. Applying inclusive and accessible design principles early will help ensure environments are inclusive for people at all life stages. • The policies do not reference dementia inclusive design principles. Incorporating Essex and national guidance, including the Environments for Ageing and Dementia Design Assessment Toolkit (EADDAT, 2024), would help ensure new neighbourhoods provide clear wayfinding and are easy to navigate for all residents. • The policies do not reference the importance of accessible routes and clear wayfinding, which are essential to support people to move around easily. • Ensuring streets, paths and public spaces are designed to be easy to navigate will support independence and inclusive accessible communities. • Reference to the Essex Design Guide- Inclusive Design would provide clear expectations for inclusive layouts, accessible public realm, and neighbourhood design that supports independence all resident, including older people and people with disabilities and/or mental health needs. The Garden Village policies do not reference inclusive or dementia inclusive design principles and do not set expectations for accessible environments. These omissions risk limiting the ability of new neighbourhoods to support independence, inclusive communities and healthy ageing. Next Steps / Alternative Wording "Developments will demonstrate compliance with the Essex Design Guide -Inclusive Design to ensure new housing, neighbourhood layouts and public realm support inclusive, accessible environments for all residents, including older people and people with disabilities and/or mental health needs. Developments will incorporate dementia-inclusive design principles, informed by Essex and national guidance including the Environments for Ageing and Dementia Design Assessment Toolkit	Comment	See above and response to the equivalent comment on SAMU8 which raised similar issues from ECC.

			(EADDAT, 2024). Neighbourhoods will include accessible routes and clear wayfinding to support people to move around easily and independently, promoting inclusive communities." (Page 222-223) ECC welcomes the commitment within the policy to prepare a comprehensive Supplementary Plan Document for the Garden Village, ensuring that no planning permissions are granted until the DPD has been adopted and a coordinated, phased approach to delivery is secured. This provides an important safeguard for achieving a landscape led masterplan, ensuring that GI is delivered in step with growth and will help secure a coherent, high-quality GBI network from the outset, integral to the Garden Village's design and delivery-led masterplan, ensuring that GI is delivered in step with growth quality . Careful consideration should be given to how the proposed new employment space could complement existing provision to boost the overall economy. Major new employment space should also be complemented by appropriate strategic transport improvements and learning provision to ensure that local residents can access new opportunities. These factors are considered important to ensure a robust placemaking is followed. It is also recommended that the policy explains / clarifies the rationale for this employment growth and its potential / intended form of uptake / use. This larger Garden Village is located in a challenging, relatively unsustainable location, raising a number of issues to consider carefully. Careful consideration should be given to how new employment space could complement existing provision to boost the overall economy. Major new employment space should also be complemented by appropriate strategic transport improvements and learning provision to ensure that local residents can access new opportunities. These factors are considered important to ensure a robust placemaking is followed. It is also recommended that the policy explains / clarifies the rationale for this employment growth and its potential / intended form of uptake / use. It is particularly positive that the DPD will require 20% BNG, support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map and delivery of multifunctional GI network incorporating existing green assets, a village green, country park, community parks, allotments and well-connected spaces for sport, play and active travel. functional GI network incorporating existing green assets, a village green, country park, community parks,		

			allotments and well connected spaces for sport, play and active travel.		
1710	13624	National Grid (Kevin Roeton, Senior Consents Manager (Onshore Planning)) [1710]	There are several proposed allocations located in close proximity to the Project's Order Limits, as follows: -Housing Allocation MSA20: Land south of Shop Road, Little Bromley, which proposes 17 dwellings. -Strategic Allocation – Mixed Use Allocation SAMU9: Horsley Cross Garden Village, which proposes a housing led mixed use development including up to 6,000 dwellings across plan periods. -Strategic Allocation – Mixed Use Allocation SAMU8: Hare Green Garden Village, which proposes a housing led mixed use development including up to 4,500 dwellings across plan periods. National Grid acknowledges that there is no direct interaction between the above sites and the Norwich to Tilbury Project. We would request that we are kept informed of any changes to these proposed site boundaries. There should be no reason why the allocations referred cannot be successfully developed alongside the Norwich to Tilbury Project. However, in order to ensure that this is the case and that developers are aware of the matters to consider when developing in proximity to overhead lines, National Grid strongly recommends that the relevant policies refer to both the Electricity Safety, Quality and Continuity Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines which will assist the developers in this regard. In addition to this National Grid is willing to meet with both the LPA and the site developers to discuss the development of the sites to ensure a mutually beneficial outcome.	Comment	Reference to relevant safety regulations and guidance will be included in the relevant section in the Local Plan where it is more suitable and appropriate to make reference to these safety regulations and to ensure safe development. Elsewhere engagement with National Grid will continue.
1656	14340	Tarchon Energy (Stuart Livesey, Development Director) [1656]	Tarchon supports the Local Plan process and highlights the need to account for the Tarchon Interconnector Project, a nationally significant energy scheme within Tendring. The Project is progressing through defined stages, with an identified search area that currently overlaps with several proposed allocations, including SAMU5, SAMU8 and SAMU9. Given its national policy support and infrastructure importance, it is considered essential that the Local Plan allows flexibility to accommodate its delivery. Ongoing coordination with the Council is recommended to manage interactions between proposed development sites and the Project's evolving footprint. (PLEASE SEE ATTACHED DOCUMENT FOR FURTHER INFORMATION)	Comment	The Plan will retain flexibility to ensure SAMU9 can progress alongside nationally significant infrastructure where such projects benefit from the necessary Development Consent Order(s). Other detailed considerations will be addressed through the comprehensive planning framework (CPF) and development management process, ensuring the Plan is effective and consistent with national infrastructure priorities.
48	14360	Essex Police [48]	Strategic Policy SAMU9: Development of Horsley Cross Garden Village	Object	The Council supports inclusion of police, fire and ambulance infrastructure.

			At F. Community Infrastructure insert a new paragraph 18. As follows: “Increased police, fire & rescue and ambulance capacity to be provided to serve the new development. This could be by means of new on-site infrastructure; an improvement, reconfiguration, extension or relocation of existing police, fire & rescue and ambulance facilities; or through financial contributions to enhance the delivery of new police, fire & rescue and ambulance facilities in the locality.”		Policy SAMU9 has been updated accordingly to ensure clarity and effectiveness in infrastructure delivery.
808	14484	Ministry of Defence (Chris Waldron, DIO Assistant Safeguarding Manager) [808]	MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply (See attached document)	Comment	The Council notes the safeguarding requirements. Policy wording will be updated where appropriate to ensure development does not adversely affect defence assets, consistent with statutory safeguarding requirements.
148	14491	Environment Agency (Environment Agency) [148]	We note the broad location for the new village as identified in the supporting text. Updates to the Flood Map for Planning from the Environment Agency’s NaFRA2 project (March 2025) have altered the extent of Flood Zones 2 and 3 within the western part of the site. An updated SFRA is recommended to reflect these changes, support a robust Sequential Test, and guide development layout to avoid flood risk areas. The draft policy should require avoidance of such areas, in line with NPPF paragraphs 172, 173 and 181(a). As these areas are limited, avoidance should be achievable and clearly directed through policy.	Comment	The SFRA has been updated to reflect NaFRA2 data and will inform sequential testing, master planning to avoid flood risk and site layout and mitigation. The Local Plan already requires development to avoid flood risk where possible. Development will be designed to be safe for its lifetime, consistent with the NPPF.
826	14498	Essex Wildlife Trust (Annie Gordon) [826]	The Horsley Cross Garden Village is the largest single allocation in the plan, proposing up to 6,000 homes in a rural location on the A120/B1035 interchange. The allocation has been screened at Category B in the HRA, with potential LSE on the Stour and Orwell Estuaries SPA and Ramsar site through disturbance and functionally linked land impacts. Like Hare Green, it is subject to a separate DPD requirement, which defers detailed spatial and ecological planning to a later stage. Many of the concerns raised in relation to Hare Green apply equally to Horsley Cross, including the need for comprehensive pre-AA ecological surveys, a requirement for a nutrient-neutral WRC discharge standard, and the need for a landscape-scale GI masterplan aligned with the LNRS. We note that the cumulative ecological impacts of two major garden villages in the A120 corridor, together with existing and proposed employment sites at Bathside Bay/Freeport East, the Collierswood Farm Strategic Business Park, and the Tendring Colchester Borders Garden Community, represent a very significant combined pressure on the estuarine environment of north Tendring. We recommend that the Appropriate Assessment includes a dedicated cumulative	Comment	The comments and concerns are noted by the Council. The policy does, and or will include: pre-comprehensive planning framework ecological surveys (including FLL), a landscape-scale GI strategy aligned with LNRS, consideration of nutrient neutrality, and an assessment of cumulative impacts. These measures ensure the allocation is legally compliant and environmentally robust

			impact assessment addressing the combined effects of all major allocations in the northern Tendring/A120 corridor on the Stour and Orwell Estuaries SPA and Hamford Water SPA/SAC. The policy for Horsley Cross specifies Strategic Green Gaps to maintain separation from the hamlet of Horsleycross Street, and landscaping buffers, which we support. However, no specific buffers to watercourses or ecological receptors are specified in the SAMU9 policy beyond the general requirements of PPL1. Given the number of watercourses draining to the Stour Estuary catchment in this area, mandatory riparian buffers — clearly specified and mapped — should be included in the DPD requirements.		
Businesses, Landowners and Developers					
705	4101	Mr Peter Le Grys [705]	While some development potential at this hub is recognised, particularly given the Horsley Cross commercial development, the suggested scheme is merely an arbitrary idea with no justification in terms of its extent, character and transport credentials other than using the A120.	Object	The spatial strategy has been informed by sustainability appraisal and evidence. Garden Villages enable comprehensive, infrastructure-led growth, provide critical mass for services and employment, and reduce pressure on existing settlements. Without such allocations, housing needs could not be met in a coordinated and sustainable manner. The allocation is therefore justified and positively prepared.
431	4465	Welbeck Strategic Land [431]	The Horsely Cross Garden Village allocation should be deleted and replaced by housing allocations at existing settlements elsewhere in the District.	Object	The spatial strategy has been informed by sustainability appraisal and evidence. Garden Villages enable comprehensive, infrastructure-led growth provide critical mass for services and employment and reduce pressure on existing settlements. Without such allocations, housing needs could not be met in a coordinated and sustainable manner. The allocation is therefore justified and positively prepared.
1422	4471	M Scott Properties Ltd (Scott Properties) [1422]	Support the location of Horsley Cross as a new Garden Village due to its proximity to existing employment, it's location on the A120 with good access to facilities in Colchester and enabling economic growth and job creation in the District. Support a Development Plan Document being prepared to define the boundary of the new Garden Village. Propose amendments to the affordable housing (section B3.) and point 20. regarding Biodiversity Net Gain as detailed in the full comments section. Consider further growth should be directed to Land west of Clacton Road, Horsley Cross as part of Horsley Cross Garden Village.	Support	Comment noted. The concerns around BNG have been addressed elsewhere however the policy reflects the Council's ambition for enhanced biodiversity outcomes – which is consistently applied throughout all relevant policies.
1462	4493	Latimer (Tendring Colchester Borders Garden Community)	Latimer has no objection in principle to the Garden Village allocation, however, would want to be assured through the allocation that there would be no detrimental impact on the TCBGC and that the allocation proportionally contributes to proposed infrastructure. We make suggested amended wording to the policy accordingly.	Object	The Council acknowledges the need to ensure no adverse impact on TCBGC. Infrastructure planning is being considered strategically. SAMU9 will be required to deliver its own infrastructure and contribute proportionately to shared infrastructure where necessary. This ensures a complementary relationship between developments.

		Developments Limited [1462]			
853	13665	Taylor Wimpey [853]	As with the Borders Garden Community, there are various factors which could impact the rate and delivery of a scheme of this nature. At this stage, a masterplan has not been developed to inform forthcoming planning applications, and it is not known how progressed discussions are between landowners and the Council.	Comment	The Council agrees that delivery of a scheme of this scale requires coordination. The requirement for a comprehensive planning framework (CPF) ensures comprehensive masterplanning, phased delivery and alignment between landowners. This provides a robust framework for effective delivery.
134	13687	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The allocation of this new Garden Village is strongly supported. Some fine-tuning is requested to some of the Requirements set out in this policy.	Comment	Comment noted - Detailed matters, including any further policy refinement (e.g. BNG, affordable housing which are amongst some of the matter raised in the detailed comments), will be considered through the comprehensive planning framework and evidence base to ensure viability and deliverability, however as set out elsewhere, the BNG requirements reflects the Council's ambition for enhanced biodiversity outcomes – which is consistently applied throughout all relevant policies. The affordable housing provision at 30% on this allocation has been viability tested and confirmed that this provision remains viable. Following the consultation, the site promoter, Rose Builders, provided the Council with additional evidence setting out the geographic extent of the land they are promoting. This evidence has been considered, and a change has been made to the boundary of the broad location for SAMU9 Horsley Cross Garden Village.
1643	14212	Bradfield Fruit Farm (Johnny Piper) [1643]	Our representation objects to Policy SAMU9 (Horsley Cross Garden Village), arguing that the Local Plan places excessive reliance on a large, complex strategic allocation with significant delivery risk. It contends that delays, market dependency, and concentrated control by a single developer could undermine housing delivery and five-year supply. The document states that prioritising SAMU9 over smaller, immediately deliverable SME sites—such as Bradfield Fruit Farm—conflicts with national policy on diversification of sites, weakens delivery resilience, and risks rendering the Plan unsound.	Object	The housing trajectory includes a mix of site sizes, ensuring resilience. Strategic allocations such as SAMU9 deliver infrastructure and long-term growth spread over the plan period and peaking towards the latter parts of the plan period, while smaller sites contribute flexibility through delivery during the earlier stages of the plan period, as set out in the latest housing trajectory. The Council considers this balanced approach sound and compliant with national policy.
1530	14306	Berrys (Lauren May, Senior Planning Consultant) [1530]	We strongly object to the Horsley Garden Village (SAMU9) which the Local Authority seek to allocate for around 6,000 homes as well as the provision of 50-60ha of employment land. We disagree with the principle of providing the majority of the plan period's housing within three garden communities which will all require a significant amount of infrastructure and other investments to enable them to come forward. It is unclear how necessary highway and other infrastructure improvements would be provided and funded and therefore at this stage we believe that the proposed housing numbers should be removed from the housing trajectory for the entire plan period.	Object	The spatial strategy has been informed by sustainability appraisal and evidence. Garden Villages enable comprehensive, infrastructure-led growth, provide critical mass for services and employment, and reduce pressure on existing settlements. Without such allocations, housing needs could not be met in a coordinated and sustainable manner. The allocation is therefore justified and positively prepared
Community Representatives					

953	3540	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
63	4014	Colchester Natural History Society (Mr Peter Hewitt, Planning Officer) [63]	As commented on other Garden Villages this approach will largely obliterate open green space that although farmed, does have a role in wildlife and local environment support.	Comment	While loss of agricultural land is acknowledged, the Garden Village approach enables strategic green infrastructure and significant biodiversity gains (minimum 20% BNG). The allocation is considered capable of delivering net environmental benefits.
1712	14236	Bernard Jenkin [1712]	East Anglia is the breadbasket of UK farming, producing high levels of arable crops. Over 3,200 hectares of high-quality farmland has been lost to development in the East of England alone, land that could produce around 20,000 tonnes of wheat and other cereals per annum. The Horsley Cross Garden Village will be removing highly productive agricultural land from production, undermining the Uks food security. This development is planned over several years, creating prolonged disruption to surrounding farmland and local wildlife. Proposed mitigation measures to protect wintering birds and functional habitats must be rigorously implemented. Consultation with local farmers and wildlife protection groups is essential to ensure agricultural productivity and biodiversity are safeguarded.	Comment	The Council recognises concerns regarding agricultural land. The Plan balances housing needs with environmental protection. Mitigation includes landscape planning, biodiversity enhancements and ecological safeguards. The allocation remains justified in the context of housing need.
1175	14443	ONTRACK Tendring Transport Users (John Smock) [1175]	It must be of considerable regret that the railway between Thorpe-le-Soken and Mistley was never completed as this would have been of immeasurable benefit to this project. However, the earthworks for this northern part of this line were completed and are still largely intact; thus a branch from Mistley to Horsley Cross (terminating at the A120) would be about 3 miles long and could be completed at relatively low cost. This could be completed initially with a later extension the further 6 miles to Thorpe-le-Soken. This would therefore be a relatively short length of track but would provide a north-south link in Tendring which is a serious deficiency at the present. In practice it will be necessary to develop high quality bus services for this area.	Comment	While rail opportunities will continue to be explored, the strategy focuses on high-quality bus-based rapid transit and active travel, largely due to uncertainties around the delivery of railway extension projects such as the one mentioned, and as a result, the potential pitfalls around relying on such projects in the context of longer term strategic growth. The travel measures that the local plan growth strategy relies on (as briefly set out above) is supported by the scale of development. Infrastructure improvements will be secured through IDP and comprehensive planning framework (CPF) processes.
96	13431	Bradfield Parish Council (Mrs Marie Snell, Clerk to the Council and Responsible Financial Officer) [96]	It is appreciated that the area detailed by the section on the TDC consultation map is only an indication of where development would be. However, because it is so imprecise, it is difficult for BPC to fully understand the diverging points, levels of coalescence and local identity erosion. The Parish Council has various questions relating to SAMU9: The Parish Council asks whether the TARCHON Interconnector Project and the existing plans for a solar farm fit in with these HCGV	Object	The Council acknowledges the detailed concerns. The broad location will be refined through the comprehensive planning framework (CPF), whilst infrastructure (transport, education, healthcare) will be delivered alongside development. Cross-boundary and NSIP coordination is ongoing with specific regard given to the stage the relevant NSIP has reached in the DCO process (at the time of writing Tarchon is putting plans in place for their second non-statutory consultation). Housing need is based on the latest standard method and evidence. BNG and environmental mitigation will be secured through policy.

			proposals? Additionally, how would the 20% BNG requirement be met if the development covers good quality agricultural land? The Parish Council questions whether the land allocated for the Garden Village indicated by the maps is even large enough to accommodate 6,000 homes together with the relevant infrastructure and services. Would the lack of land lead to coalescence between settlements and neighbouring parishes, and, thus, impact the character and amenities of existing communities? It is unclear whether TDC has collaborated with immediate neighbouring authorities with regard to these proposals and whether TDC has considered the stress 6,000 homes would have on services in Lawford and Manningtree. Furthermore, the Parish Council questions whether there is truly 'significant demand for new housing'. It is unclear whether TDC has identified and considered brownfield and Grey Field sites for dwellings, instead of greenfield land. What is the time frame for the presentation of the DPD and which authority will consider it for approval? When will construction for HCGV begin? Bradfield Parish Council has also outlined various concerns: The construction of HCGV has the potential to exceed 14,400 residents. How will this meet the needs of the 'local people' and ensure that housing is affordable for those in the District. Who will be eligible to purchase or rent the 30% affordable homes in HCGV? Similarly, will some of the housing meet demands for affordable Adult Social Care accommodation and homes with 'down-sizing' older residents in mind? Traffic, schools, primary care, sewage, water, and railway stations are significant concerns outlined by Bradfield Parish Council with regard to infrastructure. Additionally, there are concerns over the culture and environmental changes brought on by HCGV. The scale of development will have significant impacts on pollution, amenity, and wildlife. The garden village will not be sustainable, and the term 'Garden Village' is misleading. HCGV will impact farmers and agricultural land, in particular. To conclude, the Local Plan is unsustainable and will negatively impact the existing communities in the District. HCGV should be seriously reconsidered.		The DPD will address detailed issues of layout, phasing and impacts, ensuring comprehensive and coordinated delivery.
90	13436	Tendring Parish Council (Mrs Marie	The proposed development (Weeley and Horsley Cross) appears heavily weighted towards residential growth, with insufficient corresponding employment opportunities within or near the parish.	Object	The Council acknowledges the concerns raised regarding the scale of housing growth and the importance of aligning this with local

		Snell, Clerk/RFO) [90]	This imbalance would: • Increase commuter traffic. • Place further strain on the road network. • Undermine the sustainability objectives of the Plan. • Risk creating a dormitory settlement lacking local economic vitality. Housing growth must be aligned with realistic local employment provision to avoid unsustainable patterns of travel.		employment opportunities, infrastructure capacity, and the overall sustainability of Weeley and Horsley Cross. It is recognised that significant residential development, if not properly supported, can place additional pressure on the local road network, services, and community facilities, as well as increase reliance on out-commuting. These are important considerations that the Plan seeks to address. Policy SAMU9 has been formulated to promote a more balanced and self-sustaining community by including provision for new employment land alongside housing growth. The intention is to support local job creation, reduce the need to travel outside the area for work, and contribute to the vitality of the parish. The Council also acknowledges the concerns raised regarding existing infrastructure, including education provision, healthcare access, traffic congestion, and the impact on green spaces and the character of the village. These matters are being considered as part of the wider plan-making process and will be informed by further technical evidence. More detailed information on infrastructure delivery, transport impacts, and the phasing of development will be provided through the forthcoming comprehensive planning framework. This will ensure that growth is appropriately planned and supported by the necessary improvements to services and facilities. The Council remains committed to ensuring that development is sustainable, proportionate, and reflective of the needs and capacity of the local community, and all representations received will continue to inform the evolution of the Plan.
Members of the Public					
1745	14554	Amy Greenfield [1745]	I am emailing you regarding the planning development for Weeley along the Weeley by pass. We have seen this is for around 1000 homes surely this is a ridiculous amount for a village that has 1 small primary school, no doctors and lacks other facilities how is this going to be ok for traffic around this area it is already very bad especially in mornings and the summer. A lot of people use the footpath and for a small village this is too much. Will there be any fields left in this area?	Object	The Council has carefully considered concerns regarding infrastructure capacity, transport and car dependency, loss of agricultural land and the scale and impact on rural character. In response, the policy has been updated to ensure an infrastructure-first approach, secured through the comprehensive planning framework, IDP and planning obligations. With regard to transport, the policy supports high-quality public transport, active travel, and mixed use design to reduce car dependency. The environmental aspects are addressed by the robust HRA, BNG, and GI requirements within the policy. The Garden Village represents a long-term, plan-led solution to meeting housing needs while delivering infrastructure and community benefits that smaller sites cannot achieve.

971	3562	Mr Edward Bale [971]	The development of a 6,000 plus village on a site with no station or rail links? Currently the B1035 is a dangerously busy road - especially trying to pull out on to it. The car park at Manningtree station is full by mid morning! So where are the 12,000 plus cars going to go they you propose ? Build at a site with rail links! Great Bentley, Weeley and Thorpe le Soken are all served with good rail links to London. This plan will create road gridlock	Object	The Council has carefully considered concerns regarding infrastructure capacity, transport and car dependency, loss of agricultural land and the scale and impact on rural character. In response, the policy has been updated to ensure an infrastructure-first approach, secured through the comprehensive planning framework, IDP and planning obligations. With regard to transport, the policy supports high-quality public transport, active travel, and mixed use design to reduce car dependency. The environmental aspects are addressed by the robust HRA, BNG, and GI requirements within the policy. The Garden Village represents a long-term, plan-led solution to meeting housing needs while delivering infrastructure and community benefits that smaller sites cannot achieve.
580	3993	Mrs Caroline Mitchell [580]	I am very pleased to see that local people will be invited to be part of the DPD process. I also think many challenges of a new housing complex are being considered: roads and transport; having infrastructure delivered at the same time as the houses are built so that existing GP surgeries and schools are not over burdened. The separation between existing communities such as Bradfield will help these places maintain their unique character.	Comment	The Council notes support for the engagement during the comprehensive planning framework (CPF) process, infrastructure provision, and Strategic Green Gaps. The Council will continue to work with infrastructure providers and the relevant stakeholders to support development int he District. In addition to this, policy PPL6 will be retained within the Local Plan to support Strategic Green Gaps.
1350	4013	Prof Mark Lowdell [1350]	The road and rail capacity in Tendring is completely inadequate to sustain these housing and industrial developments.	Object	This representation is noted. The policy takes an Infrastructure-first approach, secured through the comprehensive planning framework (CPF), IDP and planning obligations. High-quality public transport, active travel and mixed-use design are encouraged to reduce car dependency;
581	4157	Mrs Sally Webb [581]	This development would change the area, too many houses, not enough infrastructure, not enough provision for doctors and medical centre. totally out of keeping and once again destroying farm land.	Object	The Council has carefully considered concerns regarding infrastructure capacity, transport and car dependency, loss of agricultural land and the scale and impact on rural character. In response, the policy has been updated to ensure an infrastructure-first approach, secured through the comprehensive planning framework, IDP and planning obligations. With regard to transport, the policy supports high-quality public transport, active travel, and mixed use design to reduce car dependency. The environmental aspects are addressed by the robust HRA, BNG, and GI requirements within the policy. The Garden Village represents a long-term, plan-led solution to meeting housing needs while delivering infrastructure and community benefits that smaller sites cannot achieve.
969	4487	Mr Scott Gilmour [969]	Unfortunate to see extensive development outside of the many existing train stations. I hope the rapid transport link alleviates this concern. Otherwise the design principles of the new Garden Village is promising and I hope it can provide sustainable living without reliance on a car for most journeys.	Comment	While rail opportunities will continue to be explored, the strategy focuses on high-quality bus-based rapid transit and active travel, largely due to uncertainties around the delivery of railway extension projects such as the one mentioned, and as a result, the potential pitfalls around relying on such projects in the context of longer term strategic growth. The

			Given current poor north-south public transport connectivity. I implore studying/reserving right of way for another dedicated rapid transport link, similar in concept to the abandoned Thorpe to Mistley railway. There is an opportunity to vastly improve connectivity while also serving Horsley Cross, benefitting all residents.		travel measures that the local plan growth strategy relies on (as briefly set out above) is supported by the scale of development. Infrastructure improvements will be secured through the IDP and comprehensive planning framework (CPF) processes.
758	4499	Mrs Sarah Travers [758]	The proposed development has no links to local communities, amenities, jobs, healthcare, shops or public transport links. The development will therefore be isolated in countryside and will require all residents to use their cars, increasing demand on roads already stretched to capacity. Local schools are all full as are doctors and dentists. Priority should be given to improving existing areas which are known to suffer from some of the worst levels of poverty in the UK. Housing regeneration in these areas would be a better focus.	Object	The Council agrees that growth should be near transportation hubs, such as railways, road networks, and public transportation. The Settlement Hierarchy set out in policy SPL1 outlines the growth strategy for the District, focusing development in areas which are more sustainable. However, some growth is not located in such areas due to the change in housing targets set by the Government. Although the Council has prioritised growth in sustainable areas, some developments must take place within villages with fewer job and retail opportunities, less infrastructure, and greater environmental constraints.
814	13753	Kate Hodgkiss [814]	Horsley Cross proposal for 6000 homes: Horsley Cross has no facilities to offer to a large new town. Where are people going to work, shop, go to school, visit medical facilities? How will they commute? Horsley Cross is wholly unsuitable for such a proposal and particularly given the possible NSIPs that are mentioned above.	Object	The Council has carefully considered concerns regarding infrastructure capacity, transport and car dependency, loss of agricultural land and the scale and impact on rural character. In response, the policy has been updated to ensure an infrastructure-first approach, secured through the comprehensive planning framework, IDP and planning obligations. With regard to transport, the policy supports high-quality public transport, active travel, and mixed use design to reduce car dependency. The environmental aspects are addressed by the robust HRA, BNG, and GI requirements within the policy. The Garden Village represents a long-term, plan-led solution to meeting housing needs while delivering infrastructure and community benefits that smaller sites cannot achieve.
1303	13837	Karen Usher [1303]	Objection to the proposed Horsley Cross Garden Village. Building around 6,000 homes on undeveloped agricultural land without existing services is unsustainable and would create a car dependent settlement, placing severe pressure on roads, healthcare, schools and community facilities across the whole Tendring district. The proposal risks worsening congestion on strategic routes, increasing flood risk, destroying valued countryside, and eroding rural character and green gaps between settlements. Infrastructure is uncertain and aspirational rather than guaranteed. Growth should prioritise brownfield land and sustainable expansion of existing towns. This proposal should be reconsidered.	Object	The Council has carefully considered concerns regarding infrastructure capacity, transport and car dependency, loss of agricultural land and the scale and impact on rural character. In response, the policy has been updated to ensure an infrastructure-first approach, secured through the comprehensive planning framework, IDP and planning obligations. With regard to transport, the policy supports high-quality public transport, active travel, and mixed use design to reduce car dependency. The environmental aspects are addressed by the robust HRA, BNG, and GI requirements within the policy. The Garden Village represents a long-term, plan-led solution to meeting housing needs while delivering infrastructure and community benefits that smaller sites cannot achieve.
1339	13925	Thomas and Kathryn Glover [1339]	Objection to the proposed HCGV development; it is unsound and would place an unacceptable burden on already overstretched infrastructure. Local rail, road, healthcare and education services	Object	The Council has carefully considered concerns regarding infrastructure capacity, transport and car dependency, loss of agricultural land and the scale and impact on rural character.

			around Manningtree and Lawford are at or near capacity, with no credible mitigation for the additional demand from up to 6,000 homes. The proposal would also result in the loss of high quality agricultural land, cannot credibly deliver Biodiversity Net Gain, and raises serious concerns around water and utility supply. The scale of development would irrevocably harm the character and quality of life of existing communities and exceeds any demonstrable housing need.		In response, the policy has been updated to ensure an infrastructure-first approach, secured through the comprehensive planning framework, IDP and planning obligations. With regard to transport, the policy supports high-quality public transport, active travel, and mixed use design to reduce car dependency. The environmental aspects are addressed by the robust HRA, BNG, and GI requirements within the policy. The Garden Village represents a long-term, plan-led solution to meeting housing needs while delivering infrastructure and community benefits that smaller sites cannot achieve.
1339	14247	Thomas and Kathryn Glover [1339]	Objection to the proposed Horsley Cross Garden Village and Windmill Road development, citing severe infrastructure, transport, healthcare and education constraints. Roads, rail services, GP practices and schools are already at capacity and cannot absorb the scale of growth proposed. The developments would result in unsustainable car dependency, loss of high-quality agricultural land, biodiversity harm and unresolved water supply issues. The scale of growth is disproportionate to local need, damaging to community identity and unsupported by evidence of demand. The proposals are unsound, unsustainable and harmful to existing rural communities.	Object	The Council has carefully considered concerns regarding infrastructure capacity, transport and car dependency, loss of agricultural land and the scale and impact on rural character. In response, the policy has been updated to ensure an infrastructure-first approach, secured through the comprehensive planning framework, IDP and planning obligations. With regard to transport, the policy supports high-quality public transport, active travel, and mixed use design to reduce car dependency. The environmental aspects are addressed by the robust HRA, BNG, and GI requirements within the policy. The Garden Village represents a long-term, plan-led solution to meeting housing needs while delivering infrastructure and community benefits that smaller sites cannot achieve.

Policy SAMU9: Development of Horsley Cross Garden Village

Summary of Representations

A range of representations supported or sought amendments to SAMU9 relating to active travel and bridleway connectivity, sport and recreation provision, healthcare, education, emergency services infrastructure, wastewater infrastructure, green infrastructure, SANG delivery, ecology, heritage, flood risk, inclusive design, safeguarding, and infrastructure-led delivery. The Council accepts a number of these recommendations and will strengthen the policy and supporting text to provide greater clarity on infrastructure requirements, environmental mitigation, accessibility, and coordinated delivery through the DPD and masterplanning process.

In response to the representation received, changes have been made to SAMU9 and its supporting text. The updated policy strengthens requirements for the protection, enhancement and integration of existing bridleways and rights of way, including delivery of a connected multi-user route network for walking, cycling and horse riding. Additionally strengthened are policy requirements for the delivery of Suitable Alternative Natural Greenspace (SANG) at an appropriate scale, with provision phased ahead of occupation in accordance with Natural England requirements. More broadly, ecological requirements are strengthened through pre-comprehensive planning framework ecological surveys, including assessments of functionally linked land, a landscape-scale green infrastructure strategy aligned with the Essex LNRS, consideration of nutrient neutrality requirements, and an assessment of cumulative ecological impacts. It also requires preparation of a comprehensive Open Space, Sport and Recreation Strategy alongside the masterplan, covering indoor and outdoor sport and recreation provision and aligned with relevant evidence base documents.

With regard to infrastructure, the policy has been updated to reinforce the infrastructure-first approach by requiring development phasing to align with delivery of key infrastructure, including wastewater infrastructure. SAMU9 has also been updated to clarify how it must deliver its own infrastructure and contribute proportionately to shared strategic infrastructure where required. It has also been updated to clarify that healthcare infrastructure and increased healthcare capacity will form part of the infrastructure requirements for the Garden Village, informed by the IDP and ongoing engagement with health partners. Clarification has also been given for education land requirements, including provision for SEND education needs through policy and supporting evidence. Reference has been included to the relevant electricity infrastructure safety regulations and guidance. Provisions for police, fire and ambulance infrastructure capacity have been added, including on-site provision and/or appropriate contributions towards enhanced facilities. The policy retains flexibility to ensure the Garden Village can be planned alongside relevant nationally significant infrastructure projects (NSIPs) through the comprehensive planning framework and development management process.

Policy SAH1: Development at Vicarage Farm Off Main Road and South of A120, Harwich

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
823	13570	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. “f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network.”	Comment	The Council welcomes Essex County Council’s support for the policy’s requirement for a minimum 20% Biodiversity Net Gain and alignment with the priorities identified within the Essex Local Nature Recovery Strategy (LNRS). The Council agrees that there is merit in strengthening the policy’s green infrastructure provisions to better reflect the wider objectives of Policies PPL4 and PPL4a and to reinforce the delivery of multi-functional Green and Blue Infrastructure (GBI) networks. Likewise, given the scale of the allocation and its relationship with the wider Harwich area, it is appropriate to ensure that opportunities are taken to improve active travel connectivity to surrounding neighbourhoods, services and facilities where feasible. Accordingly, the policy has been amended, where necessary, to place greater emphasis on the retention, enhancement and integration of existing ecological and amenity features within a comprehensive multi-functional Green and Blue Infrastructure network, while also promoting walking and cycling connections to adjoining areas. This approach is consistent with the Local Plan’s landscape-led design principles, biodiversity objectives and sustainable transport strategy.
148	14513	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Strategic Housing allocation contains areas of the site at medium and high risk of flooding from rivers and the sea (Flood	Comment	The Council acknowledges the Environment Agency’s comments regarding flood risk assessment requirements, the Sequential Test and the role of Strategic Flood Risk Assessment evidence in informing site allocations. The site allocation has been informed by the Council’s Strategic Flood Risk Assessment evidence and will continue to be assessed against the latest available flood risk information as part of the Local Plan Review process. Whilst parts of the site may be affected by flood risk constraints, the allocation-specific policy is supplemented by the Plan’s comprehensive flood risk policy framework, including requirements relating to site-specific Flood Risk Assessments, the Sequential and

			Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.		Exception Tests where applicable, sustainable drainage measures and climate change resilience. The Council is satisfied that flood risk matters are appropriately addressed through the existing strategic and development management policies of the Local Plan and that it is neither necessary nor proportionate to duplicate those requirements within Policy SAH1. Detailed flood risk considerations, including any requirement for site-specific assessments, emergency planning measures, drainage strategies and mitigation works, will be addressed through the planning application process and informed by the most up-to-date SFRA evidence and consultation with the relevant statutory bodies. Consequently, no amendment to Policy SAH1 is considered necessary in response to this representation.
Businesses, Landowners and Developers					
1718	14317	Harding Estates (East Anglia) Ltd [1718]	Q+A Planning support this allocation and can confirm that it can be delivered using the permitted infrastructure provided as part of the Harwich Valley development. It is a well located site located within the development boundaries of Harwich/Dovercourt and has good connections to the remainder of the settlement.	Support	This is noted and the support is welcomed.
Community Representatives					
953	3541	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4158	Mrs Sally Webb [581]	Unless schools are upgraded this should not go ahead.	Object	The Council understands concerns with regard to education capacity. However, sites within the Local Plan have been selected with consideration to infrastructure capacity. The Council has updated its Infrastructure Delivery Plan (IDP) to inform on where facilities and services are required to support growth and will continue to work with Essex County Council to provide adequate educational needs in Harwich.

Policy SAH1: Development at Vicarage Farm Off Main Road and South of A120, Harwich

Summary of Representations

Representations on Policy SAH1 focused primarily on biodiversity net gain, Green and Blue Infrastructure (GBI), active travel connectivity, flood risk and infrastructure capacity. Essex County Council supported the allocation and the policy's 20% biodiversity net gain requirement, whilst recommending stronger references to multi-functional Green and Blue Infrastructure networks and improved walking and cycling links to surrounding areas. The Environment Agency raised matters relating to flood risk assessment and Strategic Flood Risk Assessment evidence. Public comments referenced education capacity concerns. The Council concluded that the allocation remained appropriate and deliverable, with limited amendments made to strengthen green infrastructure and active travel provisions, whilst relying on the wider Local Plan flood risk policy framework and Infrastructure Delivery Plan to address flood risk and infrastructure matters.

In response to representations, Policy SAH1 has been updated in the most recent version of the Local Plan. The policy was amended to place greater emphasis on the retention, enhancement and integration of existing ecological and amenity features within a comprehensive multi-functional Green and Blue Infrastructure network, and green infrastructure requirements were strengthened to reinforce the Local Plan's landscape-led design principles and biodiversity objectives. Further to this, the policy was updated to better align with the objectives of Policies PPL4 and PPL4a and support delivery of SANGs and priorities identified within the Essex Local Nature Recovery Strategy. Additional policy wording was incorporated to promote walking and cycling connectivity and improve active travel links to surrounding neighbourhoods, services and facilities where feasible, and clarity was provided that infrastructure requirements will continue to be addressed through the Infrastructure Delivery Plan, planning obligations and ongoing engagement with Essex County Council. However, no changes were made in response to the Environment Agency's representation, as the Council concluded that flood risk matters are adequately addressed through the Strategic Flood Risk Assessment evidence base and the Local Plan's strategic and development management flood risk policies. Furthermore. no changes were made to the allocation itself, its scale of development or its overall development strategy.

Policy SAH2: Development North of Thorpe Road, Kirby Cross

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
187	3650	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	A development of this scale must respond to the existing access network. FP17 runs directly through the site and links into a wider cluster of public footpaths to the east, while established stables lie immediately to the south-east. This creates a clear functional and safety requirement for an off-road, multi-user route (MUR). Upgrading FP17 to a MUR, supported by a circular perimeter link, would safeguard equestrians and other vulnerable users and provide a coherent, legible movement structure. This aligns with NPPF 92/104, which requires safe, inclusive, and well-connected active-travel networks to be integrated into new development.	Comment	The Council welcomes the constructive comments regarding Footpath 17 and the wider Public Rights of Way network. Policy SAH2 already requires provision of safe and accessible pedestrian and cycle connections. The Council agrees that the scale of development presents an opportunity to enhance connectivity and inclusivity. The policy will be strengthened to support the retention and enhancement of FP17, the provision of a multi-user route (MUR), including where appropriate a circular link and Integration with the wider rights of way network. Detailed design will be secured through the planning application stage. This approach is justified and consistent with NPPF objectives on active travel.
791	3720	Sport England (Mr Roy Warren, Planning Manager) [791]	Part b of the policy is welcomed in relation to consideration being given to how public open space integrates with and enhances the existing playing fields and sports facilities at Kirby Playing Fields. The opportunity to extend or enhance the Kirby Playing Fields site to meet the sports facility needs of the development should be explored as this would be preferable to off-site provision for sport being made especially given the limited local opportunities for enhancing existing sports facilities.	Comment	The Council welcomes support for integration with Kirby Playing Fields. The policy already supports green infrastructure provision and local connectivity. The Council agrees that opportunities to enhance or extend existing sporting provision should be explored in preference to off-site provision where feasible. This will be referred to in the supporting text of the policy and the policy itself and secured through planning obligations.
349	4329	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	We request that the policy is amended to make infrastructure requirements clearer, including financial contributions towards increasing healthcare capacity.	Comment	The Council agrees that better clarity regarding healthcare infrastructure is required. Policy SAH2 will be amended to explicitly require contributions toward healthcare provision as required by the NHS/ICB; and the delivery of the healthcare infrastructure commensurate with the scale of development. This ensures consistency across site allocations and compliance with infrastructure planning requirements.
1654	13509	Natural England (Jonathan Burt) [1654]	This site allocates 420 new residential dwellings on a site approximately 1.5km from Hamford Water SPA. As such, Natural England advice is that this site will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites and will require a minimum of 8.1ha of SANG. However, please note that, in order to provide a 2.3km circular walk that meets NE SANG Guidelines, the minimum viable SANG size is 9-10ha for a densely wooded SANG, and 12-15ha with open habitats such as grassland and SuDS ponds.	Comment	The Council acknowledges the requirement for mitigation of recreational disturbance impacts on Habitats Sites. The policy will be updated to require provision of SANG at an appropriate scale having regard to the requirements of policy PPL4, the size of the site and its proximity to surrounding land uses and designed to be fully integrated with the development and to meet Natural England standards). The policy will also ensure delivery and management in accordance with the Essex Coast RAMS.

					This ensures the Plan remains legally compliant with the Habitats Regulations.
823	13571	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. “f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network.”	Comment	Policy SAH2 has been refined to reference a broader green and blue infrastructure (GBI) approach, strengthen links to the wider countryside and active travel routes and align with Policies PPL4 and PPL4a. This enhances policy clarity and effectiveness.
148	14514	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Strategic Housing allocation contains areas of the site at medium and high risk of flooding from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	No part of the site is located in flood zone 2 or 3 however the Council acknowledges that parts of the site may be affected localised flooding during very heavy rainfall. The updated SFRA has informed the application of the Sequential Test where required, the requirement for a site-specific Flood Risk Assessment at the Development Management stage, and the layout to avoid lower lying areas which may be susceptible to localised flooding during very heavy rainfall as well as the incorporation of sustainable drainage features. Moreover, the Local Plan already requires development to be safe for its lifetime, consistent with the NPPF.
Businesses, Landowners and Developers					
705	4102	Mr Peter Le Grys [705]	This is a site put forward by me on behalf of the landowners. The site has been promoted and an option is being secured for this well-located sustainable site which will have limited impact upon the locality.	Support	Confirmation of landowner engagement noted.

1638	4457	Lichfields (Amy Jones, Planner) [1638]	Client strongly supports principle of the site allocation and considers it has indicative capacity for 450 dwellings, demonstrated in accompanying concept masterplan. Client strongly objects to 20% BNG requirement and requirement to demonstrate wastewater capacity (see responses to Policy PPL4a and PPL5). Any infrastructure requirements to mitigate any potential impacts of development would need to be agreed secured at planning application stage, via S106. A reference should be added to the Policy to refer to the planning application stage and make reference to the phasing of provision for larger sites to ensure that infrastructure comes forward at the appropriate stages.	Comment	The Council noted the support for the allocation. The objection to the BNG element is rejected. The 20% requirement reflects the Council's environmental ambitions and is supported by the evidence base, moreover this requirement is consistently applied in the local plan. The Council disagrees with the representation's view on wastewater, as requirements are consistent with national policy and infrastructure planning. The policy framework allows for infrastructure to be secured at application stage and where necessary delivered in a phased manner where justified. Overall, the policy is justified and effective.
1530	14300	Berrys (Lauren May, Senior Planning Consultant) [1530]	This representation relates to the preferred allocation at land north of Thorpe Road, Kirby Cross (SAH2) for 420 houses. It is our view that the site should be removed as a proposed allocation as the proposed allocation would have a significant impact on the setting of a number of designated heritage assets. The expected location of the highway access is also located within an area of heightened flood risk (both fluvial and surface water). The proposals do not currently state now this would be mitigated against.	Object	The Council notes concerns regarding heritage and flood risk. Potential heritage impacts will be assessed through proportionate heritage assessment at application stage, with mitigation secured as necessary. Flood risk will be addressed through SFRA and site-specific assessment. The Council do not consider either of the above elements to be overriding in nature as to warrant to the removal of the allocation, and considers that these matters can be appropriately mitigated, and the allocation remains suitable.
Community Representatives					
953	3542	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1305	14042	Kirby Cross Residents Group (Kirby Cross Residents Group) [1305]	Objection to the proposed allocation of Site SAH2 at Kirby Cross due to the absence of legally required Biodiversity Net Gain (BNG) evidence under the Environment Act 2021. No habitat baseline, statutory biodiversity metric, Biodiversity Gain Plan or details of how a 10% net gain secured for 30 years would be achieved have been published. Without this information, the allocation is unsupported, non-compliant with national policy and procedurally unsound. The Council should publish the full BNG evidence, clarify exemption status if applicable, or remove SAH2 from the Local Plan unless compliance can be demonstrated.	Object	The Council recognises concerns regarding ecological impacts and Biodiversity Net Gain. The allocation has been informed by the Plan's evidence base, including HRA and ecological assessments. Policy SAH2 requires minimum 20% BNG, compliance with Policies PPL4 and PPL4a and site-level surveys at application stage. Detailed ecological surveys are not required at allocation stage but will be secured through planning applications. The Council is satisfied that the policy framework ensures compliance with the Habitats Regulations and national policy.

1163	14082	Cllr Anne and Pierre Oxley [1163]	Objection to the proposed housing allocations in Walton-on-the-Naze, Frinton, Kirby-le-Soken and Great Holland. The sites fail the Local Plan soundness tests and conflict with national planning policy due to inadequate infrastructure capacity, unsustainable locations reliant on car travel, highway and traffic impacts, flood risk, loss of greenfield land, and harm to community character. The cumulative impacts on services, transport and the environment are not properly assessed, and site deliverability is uncertain. I ask that the scale and location of these allocations be reconsidered before the Local Plan progresses.	Object	The Council acknowledges concerns regarding infrastructure capacity, sustainability and cumulative impacts. These matters are addressed through the Infrastructure Delivery Plan (IDP), planning obligations and phased delivery, and policy requirements for transport, education, healthcare and utilities. The site is located adjacent to an existing settlement and benefits from access to services. The Council considers the allocation sustainable and deliverable, with impacts capable of mitigation.
294	14251	Kirby-le-Soken Village Preservation Society (Mrs Chris Heal, Secretary) [294]	We are writing to tell you of our dismay and concern when learning of the proposal in the Local Plan to build 600 new homes on prime agricultural land between Kirby Cross and Kirby-le-Soken. After a huge increase in house building in this area, the village of Kirby-le-Soken (600+ homes) has doubled in size. A further increase of 100% would require massive improvements to infrastructure (e.g. footpaths, roads, schools, sewerage, health services) in order to provide adequate resources for residents. This area is full of natural wildlife and is an area of outstanding natural beauty. Acres of land have been lost to building approximately 1000 new homes in the last ten years. The area earmarked is prime agricultural land and should be used to grow food; Surrounding footpaths are in continual use by residents for recreation and dog walking. The hillside is dotted with natural springs. Excess waters run-off naturally into the backwaters. Morehousing would prevent this natural run-off and may cause flooding in the lower village. The sewerage system is currently working at capacity and in need of major improvements. The existing underground drainage will not cope with more buildings. Schools in the area are oversubscribed. Local roads are inadequate. Nearby Kirby School causes traffic chaos at drop-off and pick-up times. Roads are narrow and many do not have adequate footpaths. All Doctors' Surgeries in the area are struggling to cope and at the very least a new Health Centre isneeded. Nearest hospitals are Clacton Hospital (10 miles) and Colchester Hospital (20 miles). Hamford Water on the backwaters is an area of Special Scientific Interest.	Comment	The Council recognises concerns regarding infrastructure, agricultural land, landscape harm and other environmental impacts as set out in this representation. The Plan seeks to balance housing needs with environmental protection. The Council clearly recognise that any growth, no matter where, will inevitably result in some landscape and environmental harm and some of the key areas of focus here and elsewhere the local plan is mitigation and infrastructure provision. The site has been selected based on a wide number of factors including sustainability considerations. Infrastructure will be secured through planning obligations, ecological mitigation and green infrastructure will be delivered, and flood risk and drainage will be addressed through technical assessment. The comment on the site's location in an area that is designated as an area of outstanding natural beauty is also recognise, whilst the Council does not dispute that the immediate and wider area has a unique and special landscape character, the National Landscape (or previously known as 'area of outstanding natural beauty') is located further to the north and north west along the Stour Estuary. The allocation is considered justified and appropriate.

1305	14275	Kirby Cross Residents Group (Kirby Cross Residents Group) [1305]	Objection to the proposed Kirby Cross / Kirby-le-Soken allocation as unsound due to its ecological sensitivity and lack of evidence. The site forms part of a functioning ecological network within the Strategic Green Gap, supporting protected and priority species including bats, birds, reptiles and amphibians. The allocation is not supported by adequate ecological surveys, fails to demonstrate deliverable Biodiversity Net Gain, and risks breaching the Habitats Regulations. Development would fragment habitats, introduce harmful lighting, and erode the Green Gap. No exceptional circumstances or overriding need have been demonstrated. The objection requests removal of the site or deferral pending comprehensive ecological assessment.	Object	Concerns regarding ecological impacts and Biodiversity Net Gain are recognised. The allocation has been informed by the Plan's evidence base, including HRA and ecological assessments. Amongst other requirements, policy SAH2 also requires minimum 20% BNG, full compliance with Policies PPL4 and PPL4a, and site-level surveys at application stage. Detailed ecological surveys are not required at allocation stage but will be secured through planning applications. The Council is satisfied that the policy framework ensures compliance with the Habitats Regulations and national policy.
258	13612	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	Whilst being very neutral on this policy the town council would wish to comment. That prior to commencement of this development there would need to be a reduction in speed limit at this location. If this site is included, then the strategic green gap between Kirby Cross and Kirby-le-Soken should be extended as proposed on the map that forms part of this consultation and as a priority.	Comment	Matters relating to speed limits and detailed design will be addressed at the planning application stage in consultation with highway authorities, however elements concerning highways safety and to imposition of a suitable speed limit along Thorpe Road and at key locations, including at the point where the new site access will be created along Thorpe Road, are crucial elements to the delivery of the scheme and will become known at the stage set out above. The Council has consulted with the relevant highway authority and is confident that with the requirement mitigation and suitable speed limits, a safe and suitable access can be achieved having regard to the scale and nature of the allocation. The role and extent of the Strategic Green Gap is addressed through the Plan's spatial policies.
Members of the Public					
1065	3743	Mrs Helen Dix [1065]	SAH2 SAH3 Local residents identified sever sewerage problems from too many new houses. Thorpe through to Walton:- end of the line. Infrastructure here is finite. You cannot continue building more and more houses in these villages without consequences. No improvements or benefits to services seen from the large developments Laurels Finches Park/Samphire Meadows already built. More congestion and extra traffic flow during summer months from visitors. Destroying a beautiful area of landscape, prime farmland, footpaths thus depriving residents of benefits to mental health and wellbeing. Loss of wildlife habitat:- Adders, Grass snakes, which are on the European protection list.	Object	In response, the allocation, amongst other safeguarding measures, also requires retention and enhancement of key features, provision of green infrastructure, and biodiversity net gain. The Council considers that the development can deliver net environmental benefits.
996	3647	Mrs Anuva Deegan [996]	Our objection is based on the following; a) No availability of infrastructure, including schools GPsurgeries, roads, no parking in Frinton town, no bus service on a regular basis in and out of Kirby Cross. b) Our view of the open fields is the main reason for purchasing our home this project will be an eye sore and massively devalue our home.	Object	Policy SAH2 has been amended to explicitly require contributions toward healthcare infrastructure and the delivery of services aligned with development and in accordance with the IDP. This ensures consistency with other allocations and effective infrastructure provision. Concerns around employment are noted and the Local Plan is expanding its employment land allocations.

			c) No job opportunities in the vicinity. Most people here are self employed or pensioners. d) Nurseries are already oversubscribed. No open parks and places for children to play unless they go to the Frinton beach.		The Council notes concerns around loss of views and impact on property prices however these matters are not material planning considerations and cannot be taken into account as part of the local plan process.
997	3648	Mr ADRIAN DEEGAN [997]	The roads are already far too busy and dangerous. The schools and nurseries have no places. The Thorpe Doctor's Surgury, is already providing a very poor service because it is oversubscribed. [redacted] is witness to this and was neglected for 6 months and as a result had to be hospitalised. This proposed project is a diabolical idea. In addition to the above, we bought our property for the view. To take this away is completely unacceptable. I totally object to this plan and I would have no hesitation in suing the developer, if I have to.	Object	The Council has consulted with the relevant highway authority and is satisfied that, with appropriate mitigation measures and suitable speed limits, a safe and appropriate access can be achieved, having regard to the scale and nature of the proposed allocation. Concerns regarding existing traffic levels on local roads are noted. The Local Plan also includes policies aimed at improving public transport connections and services, including (and linked directly with this allocation) delivering necessary improvements and requirements set out within the Infrastructure Delivery Plan (IDP). The Council acknowledges concerns regarding healthcare provision. In response, Policy SAH2 has been amended to explicitly require contributions toward healthcare infrastructure and the delivery of services aligned with the needs arising from the development. These amendments will ensure consistency with other allocations and support the effective provision of necessary infrastructure.
998	3649	Miss Karishma Deegan [998]	I strongly object to the development. [Redacted] farm view [redacted] will be replaced with a view of someone's backyard. Furthermore there are no social provisions for such a large development and such a large increase in the population. The GP surgeries are struggling as it is. Mental health facilities are negligible and schools/nurseries will not be able to accommodate this increase. There is no pavement between Kirby Cross and Thorpe. I have seen children, going to school navigating that tiny, dangerous footpath.	Object	The Council notes concerns regarding the loss of views; however, such matters are not material planning considerations and therefore cannot be taken into account through the Local Plan process. The Council acknowledges concerns regarding the capacity of local infrastructure, including healthcare and education provision. In response, Policy SAH2 has been amended to explicitly require contributions toward healthcare infrastructure and the delivery of services aligned with the needs arising from the development. These amendments will ensure consistency with other site allocations and support the timely and effective provision of necessary infrastructure. Concerns regarding pedestrian safety and the absence of a continuous footpath between Kirby Cross and Thorpe are also noted. The Infrastructure Delivery Plan (IDP) identifies the infrastructure required to support planned growth and will inform the nature of any necessary improvements. Where such improvements meet the relevant planning tests, appropriate contributions will be sought to support their delivery.
1033	3690	Mrs Kim Shaw [1033]	*This site leads out onto an extremely busy main road which goes through the village to Frinton and Walton-on-the-Naze. In Summer there is already frequent tourist gridlock. * No infrastructure supports these houses: schools and hospitals are full and there are no doctor's appointments. *Wildlife is abundant here: badgers, foxes, deer and a wide range of	Comment	The allocation requires retention and enhancement of key green features, the provision of green infrastructure and biodiversity net gain. The Council considers that the development can deliver net environmental benefits. Policy SAH2 has been amended to explicitly require contributions toward healthcare infrastructure; and the delivery of services aligned with the needs arising from the development.

			birds. Britain is already the most nature-depleted country in Europe: improvement not further destruction is needed. * Your own document says: "Tendring has the highest proportion of households without access to natural green space in Essex" and "the lowest life expectancies". Why worsen it?		
1059	3731	Mr Matthew Sutton [1059]	Policy SAH2 allocates 420 dwellings at Kirby Cross with no healthcare infrastructure requirement - not even the generic NHS/ICB financial contribution clause applied to every other major allocation in this plan. The Council acknowledges existing infrastructure constraints in the Frinton/Walton/Kirby Cross area yet proposes significant further growth with no commitment to address the healthcare deficit. This inconsistency must be corrected. The policy must be amended to require healthcare contributions as required by the NHS ICB, equivalent to the provisions in all other major site policies.	Object	Policy SAH2 has been amended to explicitly require contributions toward healthcare infrastructure and the delivery of services aligned with the needs arising from the development.
581	4159	Mrs Sally Webb [581]	Farm land which is being used to grow crops should be be turned over to housing.	Object	The spatial strategy requires a balance between housing need and environmental protection. While some loss of agricultural land is unavoidable, the policy ensures landscape-led design the retention of features and buffers and integration with the surrounding area. The allocation is justified in the context of housing need.
1357	4180	Mr Nicholas Farrow [1357]	Kirby Cross has already had two large areas of housing development that were not part of an agreed development plan. There is already a strain on local services. Increasing the frequency of train services will be extremely expensive and may not meet the cost-benefit threshold. The increase in population will not be sustainable without an integrated plan for upgrades to the road network. SAH2 will dramatically alter the prevailing character of Kirby Cross, have a huge visual impact and involves the loss of a large area of the best and most versatile (BMV) agricultural land.	Object	The spatial strategy requires a balance between housing need and environmental protection. While some loss of agricultural land is unavoidable, the policy ensures landscape-led design, the retention of features and buffers and integration with the surrounding area. The allocation is justified in the context of housing need.
1733	13424	Jules and Louise Horton [1733]	I write to formally object to the proposed allocation of land within the Kirby Cross / Kirby-le-Soken area as identified within the Tendring District Local Plan Preferred Options Consultation. The objection is made with reference to: Strategic Policy PPL4 - Biodiversity and Geodiversity, Policy PPL4a - Biodiversity Net Gain, National Planning Policy Framework (NPPF), The Conservation of Habitats and Species Regulations 2017 (as amended). The proposed allocation is unsound as it: 1. Would fragment a functioning ecological network 2. Risks harm to European Protected Species and priority species	Object	The allocation has been informed by the Plan's evidence base, including HRA and ecological assessments. Policy SAH2 requires a minimum 20% BNG, compliance with Policies PPL4 and PPL4a and site-level surveys at application stage. Detailed ecological surveys are not required at allocation stage but will be secured through planning applications. The Council is satisfied that the policy framework ensures compliance with the Habitats Regulations and national policy.

			3. Is supported by insufficient ecological survey data 4. Fails to demonstrate deliverable Biodiversity Net Gain 5. Would compromise the Strategic Green Gap 6. Does not demonstrate exceptional circumstances to justify ecological harm		
1307	13706	Teresa Dwight [1307]	Development in and around Kirby is inappropriate due to the lack of infrastructure services, the potential impacts on wildlife, and the disproportionate scale of housing. Such overdevelopment contradicts the Local Plan's protection of green space and will negatively impact the local community.	Object	The matters raised are noted and are addressed through the Infrastructure Delivery Plan (IDP), planning obligations and phased delivery, policy requirements for transport, education, healthcare and utilities. The site is located adjacent to an existing settlement and benefits from access to services. The Council considers the allocation sustainable and deliverable, with impacts capable of mitigation.
1320	13717	Ruth Mochrie [1320]	I have lived in this area for fifty years and have seen many changes over the years but the building in this area now has become far too extensive. I understand the pressure put on by the government but these towns and villages are fast becoming one great big town unable to sustain the needs of the residents. We all know the difficulties faced when trying to get appointments and the roads are so congested in the summer. Our hospital in Colchester is full and struggling. By adding 420 houses to Kirby Cross the number of vehicles coming on to the main Thorpe Road could be as much as 800 or more. It's difficult enough to get on to that road as it is. When there is a problem there is only one road to get in and out of Frinton and the place gets gridlocked now so goodness knows what an extra 400 houses will cause. In other parts of the area earmarked for building there are areas which are close to of not on flood plains. The sewage system is struggling and as for the wildlife what chance have they got. Since the building at The Laurels there have been no wild birds seen even though the roads are called Woodpecker and Barn Owl. It is so sad that our villages are being spoiled and I strongly advocate that this plan is blocked.	Object	These matters are addressed through the Infrastructure Delivery Plan (IDP) including requirements for education and healthcare, planning obligations and phased delivery and policy requirements for transport and utilities. The site is located adjacent to an existing settlement and benefits from access to services. The Council considers the allocation sustainable and deliverable, with impacts capable of mitigation.
1183	13745	Jackie Crane [1183]	I attended the above village meeting where it was estimated 150 residents turned up to speak out and show as well as my own disgust against plans for 660 homes on greenfield land in our village. Following a speech from a resident wherby it was directly asked if we wanted more houses there was a unanimous show of hands and I was one of those residents inidcating "NO". I object to these plans and I urge Tendring Council to remove the development proposal, protect the green gap between the two villages and to undertake ecological and infratructure assessment.	Object	The Council notes the concerns raised, including reference to the level of local opposition expressed at the village meeting. All representations received as part of the plan-making process, whether in support or objection, are carefully considered. In respect of the request to protect the land as a “green gap,” it should be noted that the site in question is not currently designated as a Strategic Green Gap within the adopted or emerging Local Plan. The Strategic Green Gap policy and its supporting text set out specific criteria for such designations, including the need to prevent coalescence between settlements and to demonstrate clear strategic importance. The Council has assessed the site against these criteria and does not consider that it meets the threshold required to justify designation as a

					Strategic Green Gap. As such, the proposed allocation is not considered to conflict with the aims of that policy. The Local Plan process has also been informed by a range of technical evidence, including ecological and infrastructure assessments, to ensure that development is planned in a coordinated and sustainable manner. Further detailed assessment will be required at the planning application stage, where appropriate mitigation and infrastructure provision will be secured in line with adopted policies.
1641	13765	Stuart Birchall [1641]	The Kirby Cross / Kirby-le-Soken allocation is unsound and contrary to local and national planning policy. The site forms part of a connected ecological network within the Strategic Green Gap and supports protected and priority species, including bats, birds, reptiles and amphibians. The allocation lacks adequate ecological surveys, failing to demonstrate deliverable Biodiversity Net Gain, and risking harm to European Protected Species, creating legal risk. Development would fragment habitats, introduce harmful lighting and erode landscape separation. The site should be removed or deferred pending full ecological assessment.	Object	The Council recognises concerns regarding ecological impacts and Biodiversity Net Gain. The allocation has been informed by the Plan's evidence base, including HRA and ecological assessments. Policy SAH2 requires a minimum 20% BNG, compliance with Policies PPL4 and PPL4a and site-level surveys at application stage. Detailed ecological surveys are not required at allocation stage but will be secured through planning applications. The Council is satisfied that the policy framework ensures compliance with the Habitats Regulations and national policy.
1357	13767	Mr Nicholas Farrow [1357]	Objection to New Strategic Policy SAH2 for development north of Thorpe Road, Kirby Cross, as it is disproportionate and unsuited to a rural area. National housing targets are failing to reflect rural-proofing principles, limited brownfield land, and infrastructure constraints. Locally, existing housing growth has already strained schools, healthcare and transport. The road and rail networks are constrained and lack a clear, funded upgrade strategy. The proposal would significantly alter village character, worsen congestion, and result in the loss of best and most versatile agricultural land, harming food security and local habitats.	Object	The level of growth proposed through Policy SAH2 has been informed by national planning policy requirements and the need to meet identified housing need across the District. Site selection has also taken into account the availability of land, including the limited supply of previously developed (brownfield) land. Concerns regarding pressure on local infrastructure, including schools, healthcare and transport networks, are acknowledged. The Local Plan is supported by an Infrastructure Delivery Plan (IDP), which identifies the infrastructure required to support growth. Policy SAH2 will require appropriate contributions and provision to ensure that impacts arising from the development are mitigated in line with relevant planning tests. With regard to impacts on village character, agricultural land and local habitats, these matters have been considered through the site assessment process and supporting evidence base. Detailed impacts, including those relating to landscape, ecology and transport, will be further assessed at the planning application stage, where appropriate mitigation measures will be secured.
1284	13780	D How [1284]	Objection to large-scale development at Kirby Cross, particularly the SAH2 allocation. Recent and proposed housing schemes are already eroding this character and placing unacceptable strain on infrastructure. The scale of development would dominate countryside views, lies far from services, and relies on car use. Strong local opposition has been clearly expressed at public	Object	The Council acknowledges concerns regarding traffic and infrastructure. Transport impacts will be assessed through planning applications, with mitigation secured as necessary. Infrastructure provision will be aligned with development through the IDP and planning obligations.

			meetings. The Council should reconsider site choices, listen to residents, and prioritise community wellbeing and the environment over meeting numerical targets.		The Council considers impacts can be appropriately mitigated.
1034	13782	Mr Dean Garwood [1034]	Objection to Draft Proposal SAH2 for 420 new dwellings west of Halstead Road; the scale is excessive and harmful to residents already affected by nearby overdevelopment at Willow Farm. It raises serious concerns about increased traffic, congestion, pollution and impacts on Kirby Primary Academy and local roads. The proposal directly conflicts with adopted Local Plan policy EN2, which protects local green gaps and prevents village coalescence. Building on this land would erode countryside views, alter village character, and strain already inadequate infrastructure such as drainage, healthcare, schools, waste and parking, with impacts outweighing any benefits.	Object	The level of development proposed under Policy SAH2 has been informed by the need to meet identified housing requirements across the District, alongside an assessment of suitable and available sites. Concerns relating to traffic, congestion and impacts on local roads and services, including education and healthcare provision, are acknowledged. The Local Plan is supported by an Infrastructure Delivery Plan (IDP), which identifies the infrastructure required to support planned growth. Policy SAH2 will require appropriate mitigation and contributions to ensure that impacts are addressed in line with national planning policy and relevant infrastructure providers. In respect of Policy EN2 and the protection of green gaps, it should be noted that the site is not located within a designated Strategic Green Gap as defined in the adopted or emerging Local Plan. The Strategic Green Gap policy and supporting text set out clear criteria for such designations, and the site has been assessed as not meeting the threshold for this level of protection. As such, the proposal is not considered to conflict with Policy EN2 in this regard. Matters relating to landscape impact, loss of countryside views, agricultural land, drainage and environmental effects have been considered through the supporting evidence base. These issues will be subject to further detailed assessment at the planning application stage, where appropriate mitigation will be secured to ensure the development is acceptable.
1552	13789	Sue White [1552]	My representations against the Proposed Local Plan in Kirby Cross are based on the area already being saturated with new builds, many of which remain unsold, calling into question the need for further housing. The existing infrastructure cannot cope, with GP services under pressure, no NHS dental provision, and schools already full and oversubscribed. Sewage systems are outdated, with frequent pollution incidents and flooding due to poor drainage, which further development would worsen. Additional housing will increase traffic beyond road capacity and impact emergency services. Wildlife habitats will also be lost. The scale of development proposed is excessive for the area.	Object	The level of growth proposed through Policy SAH2 is informed by the District's objectively assessed housing need and national planning policy requirements, rather than short-term market conditions. Concerns relating to infrastructure capacity, including healthcare services, education provision, drainage and utilities, are acknowledged. The Local Plan is supported by an Infrastructure Delivery Plan (IDP), which identifies the infrastructure required to support planned growth. Policy SAH2 will require appropriate mitigation measures and contributions to ensure that impacts are addressed in accordance with national policy and the relevant planning tests. Issues relating to traffic, emergency access and local road capacity are also recognised and will be assessed in detail, with suitable mitigation secured as part of any future planning application. Potential impacts on drainage, flooding and wastewater infrastructure, as well as on ecological interests, have been considered through the supporting evidence base and will be subject to further detailed

					assessment at the planning application stage, where necessary mitigation and improvements will be secured. The Council considers that, subject to these safeguards, the scale of development proposed is appropriate and can be accommodated in a planned and sustainable manner.
1510	13814	Julie and Trevor Cottee [1510]	Objection to the scale and location of the proposed 420-home development. Existing infrastructure in Kirby Cross and Frinton is already at full capacity, with schools, GP and dental services unable to meet current demand. This scheme could increase the population by around 25%, irreversibly harming village character and creating a dominant visual impact at the settlement edge. It would result in the loss of Grade A agricultural land and wildlife habitats despite available brownfield alternatives. Transport options are poor, facilities are not walkable, and reliance on private cars would increase. With unsold housing elsewhere and limited employment growth, the proposal is unsustainable and unjustified.	Object	Transport impacts will be assessed through planning applications, with mitigation secured as necessary. Infrastructure provision will be aligned with development through the IDP and planning obligations. The Council considers impacts can be appropriately mitigated.
1545	13826	Julie Okine [1545]	Summary of Objection The proposed allocation is unsound as it: 1. Would fragment a functioning ecological network 2. Risks harm to European Protected Species and priority species 3. Is supported by insufficient ecological survey data 4. Fails to demonstrate deliverable Biodiversity Net Gain 5. Would compromise the Strategic Green Gap 6. Does not demonstrate exceptional circumstances to justify ecological harm	Object	The allocation has been informed by the Plan's evidence base, including HRA and ecological assessments. Policy SAH2 requires a minimum 20% BNG, compliance with Policies PPL4 and PPL4a and site-level surveys at application stage. Detailed ecological surveys are not required at allocation stage but will be secured through planning applications. The Council is satisfied that the policy framework ensures compliance with the Habitats Regulations and national policy.
1626	13831	Denise Rider [1626]	Building houses is absolutely fine but does anybody think about the lack of doctors in this area. It would be a good idea to set aside a small part of land and build a Health Centre. I worked in one in London and it included Audiology, Ophthalmology, Dental, Physiotherapy, Mental Health, podiatry, health visitors, district nurses as well as a doctors surgery. With Clacton and Colchester hospitals so busy it would be beneficial to Walton, Frinton, Thorpe and Kirby to have all these departments closer to home to save a lot of elderly patients especially the journeys. I personally belong to the Thorpe surgery and with all the new builds already there it's almost impossible to get an appointment now let alone with more going up. I have lived here for ten years and have never seen a doctor only nurses. Apart from that there's also the lack of schools, something needs to be done about it all but as usual it falls on deaf ears.	Comment	The Council acknowledges concerns regarding healthcare provision. Policy SAH2 has been amended to explicitly require contributions toward healthcare infrastructure and the delivery of services aligned with development. This ensures consistency with other allocations and effective infrastructure provision.
1279	13832	S Atkins [1279]	I wish to object to the further development planned for kirby le soken. The area is already suffering with over development giving us massive increases in traffic, reduced GP availability, noise and pollution making the area much more difficult to live in. We moved	Object	The Council notes the concerns raised regarding the perceived level of existing development and its impacts on local infrastructure, including traffic, healthcare provision and general amenity. The scale of development proposed through Policy SAH2 has been informed by the

			to the area to have a better lifestyle, planning and building has reduced that severely. Please recognise that the area has already surpassed its housing and people limits. Consider residents opinions, tell the government ENOUGH! Instead build the infrastructure needed to cope with the overdeveloped we already have.		District's identified housing need and national planning policy requirements, which the Council is required to plan for. Concerns relating to pressure on local services, including GP capacity and other infrastructure, are acknowledged. The Local Plan is supported by an Infrastructure Delivery Plan (IDP), which identifies the infrastructure necessary to support planned growth. Policy SAH2 will require appropriate mitigation measures and contributions to ensure that impacts are addressed in line with national policy and the relevant planning tests. The Council recognises the importance of maintaining quality of life for existing residents. However, it considers that, with appropriate infrastructure provision and mitigation secured through the planning process, the proposed level of growth can be delivered in a coordinated and sustainable manner.
983	13844	Mr Richard Barnes [983]	Objection to the Local Plan proposal as it represents a disproportionate and unsustainable expansion of Kirby-le-Soken, contrary to local and national planning policy. The scale of development conflicts with the village's designation as a Small Rural Settlement and encroaches into open countryside. It would place severe pressure on already over-capacity healthcare and education services, significantly worsen traffic on the constrained B1034, and create a car-dependent development. The proximity to Hamford Water poses serious risks to protected habitats, biodiversity, and green gaps that define settlement identity. The harm clearly outweighs any benefits.	Object	The Council acknowledges concerns regarding infrastructure capacity, sustainability and cumulative impacts. These matters are addressed through the Infrastructure Delivery Plan (IDP). planning obligations and phased delivery and policy requirements for transport, education, healthcare and utilities. The site is located adjacent to an existing settlement and benefits from access to services. The Council considers the allocation sustainable and deliverable, with impacts capable of mitigation.
1182	13848	Linda Watcham [1182]	I strongly object to this proposal due to the loss of protected Green Gap land directly adjoining my property, which I had been previously informed could not be built on. The development would run the length of my garden, causing significant harm to my property and its value. This has already impacted attempts to sell my home and has placed me in a difficult position. The proposal represents unacceptable loss of farmland and open space. My husband and I wish to be formally recorded as opposing this development and raise concerns regarding compensation for the impact on our property.	Object	The allocation forms part of the Local Plan strategy for meeting housing needs in sustainable locations. The site has been assessed through the plan-making process and does not currently forms part of any designated strategic green gap. The Council acknowledges that the site contributes towards the open and predominantly undeveloped character of the areas north of the linear build form along Thorpe Road – however a balance needs to be struck between meeting TDCs increased housing need and releasing suitably located land directly adjacent to existing settlements for housing development. Any impacts on neighbouring residents, landscape, biodiversity and infrastructure will be addressed through the policy requirements and planning application process. Matters relating to property value and compensation fall outside the scope of the Local Plan.
1521	13866	Peter and Barbara Hart [1521]	I strongly object to the proposed 420-dwelling development in Kirby Cross as it conflicts with Local Plan policies and would cause significant harm. It would damage wildlife habitats and ecological networks, result in the loss of productive agricultural land, and extend development beyond the Settlement Development Boundary. The scale represents inappropriate urban sprawl, placing unsustainable pressure on schools, healthcare, highways, and drainage systems. Increased traffic, flood risk, and prolonged construction disruption would further impact residents. When considered alongside other developments, the cumulative effects	Object	The site has been identified through the Local Plan evidence base as a suitable and sustainable location for growth. The policy contains requirements relating to biodiversity, green infrastructure, flood risk, highways and infrastructure provision, whilst wider impacts will be assessed and mitigated through the planning application process and planning obligations where necessary.

			are unacceptable, making the proposal unsustainable and contrary to the Local Plan strategy.		
1645	13910	Kwisatz Haderach [1645]	Objection to the proposed land allocation at Kirby Cross / Kirby-le-Soken, arguing it is unsound, policy-conflicting and inadequately evidenced. The site forms part of a functioning ecological network within the Strategic Green Gap and supports, or is likely to support, protected and priority species including bats, birds, reptiles and amphibians. Development would fragment habitats, introduce harmful lighting, and erode ecological connectivity. Insufficient ecological surveys mean impacts cannot be properly assessed, Biodiversity Net Gain cannot be demonstrated, and compliance with the Habitats Regulations cannot be assured. The allocation should be removed or deferred pending comprehensive ecological assessment.	Object	Ecological impacts, protected species, habitat connectivity, Biodiversity Net Gain and Habitats Regulations requirements will be assessed through the planning application process and informed by appropriate ecological evidence. The policy includes extensive biodiversity and green infrastructure requirements to ensure impacts are avoided, mitigated or compensated where necessary.
970	13915	Ms Bonnie Green [970]	Objection to the proposed land allocation at Kirby Cross / Kirby-le-Soken, as it is unsound, contrary to planning policy and unsupported by adequate ecological evidence. The site forms part of a connected ecological network within the Strategic Green Gap, supporting or likely to support protected and priority species including bats, birds, reptiles and amphibians. Development would fragment habitats, introduce harmful lighting, and disrupt ecological connectivity. The absence of comprehensive species surveys means impacts cannot be properly assessed, Biodiversity Net Gain cannot be demonstrated, and compliance with the Habitats Regulations is uncertain. The allocation should be removed or deferred pending full ecological assessment.	Object	Ecological surveys and assessments will be required at the planning application stage, and any development will need to comply with the biodiversity, Habitats Regulations and Biodiversity Net Gain requirements of the Local Plan and national legislation. The allocation remains appropriate in principle
1298	13922	Tracey, Terry, and Natasha White [1298]	There are serious concerns about the scale and impact of proposed developments on Kirby Cross and Kirby-le-Soken. The schemes would harm the environment, biodiversity, and flood resilience, while worsening traffic, road safety, noise and pollution on unsuitable country lanes. The developments would overwhelm already stretched local services, including GP surgeries, schools, drainage, electricity networks and public transport. Residents fear loss of village character, increased danger for pedestrians, and damage to homes from construction traffic. There is a question regarding housing need, deliverability, and infrastructure capacity; perhaps growth should be focused in more suitable locations with proper roads and services rather than small villages.	Object	Infrastructure capacity, flood risk, biodiversity, highways and other environmental impacts have informed the site selection process and will continue to be considered through detailed planning applications. Any necessary mitigation and infrastructure improvements will be secured through planning obligations and relevant policy requirements.
1184	13946	Kay Carswell [1184]	Objection to the proposed development of 420 houses at Site SAH2. Significant building has already taken place along Kirby Cross Road, and local infrastructure cannot support development of this scale. Roads, schools and GP services are already under pressure, and increased traffic through Thorpe-le-Soken would be severe, with accidents likely to bring the only route to Frinton and Walton to a standstill. Additional traffic would increase carbon emissions and harm the area's role as a busy seaside resort. The proposal would also erode green spaces, damage wildlife and biodiversity, and remove valued public footpaths, undermining countryside access and wellbeing.	Object	The allocation has been identified as a sustainable location for growth and infrastructure requirements will be addressed through the Infrastructure Delivery Plan, planning obligations and the development management process. Biodiversity and public rights of way considerations are addressed within the policy framework.

1105	13950	Mrs Sue Mclauchlan [1105]	Objection due to serious safety, infrastructure and community impacts. Frinton Road is the only through route and already unsafe, with limited pavements, no crossings, and severe congestion that routinely brings the area to a standstill, delaying emergency services. Drainage and sewers are at capacity, roads are deteriorating, and utilities are unreliable amid ongoing works. Local GP services are over-stretched and further growth would worsen access to care. The development would also destroy valued wildlife habitats and green space. Thorpe is already over-populated, and additional large-scale development would irreversibly damage the village's safety, infrastructure, character and quality of life.	Object	Impacts on highways, drainage, utilities, healthcare and biodiversity will be assessed through the planning application process and addressed through appropriate mitigation where necessary. The allocation remains consistent with the overall strategy for meeting housing needs within the District.
1294	13955	Madge & David Whitehead [1294]	1) The roads are already congested particularly at peak times and worse during the holiday season and at weekends. 2) The NHS / Doctors Surgeries are already overloaded with 3 - 4 weeks waiting lists for Doctors appointments. 3) We believe the schools are already at capacity without the additional admissions that the development would create. 4) We are concerned that local infrastructure is not adequate to support development on this scale.	Object	These matters have been considered through the preparation of the Local Plan and Infrastructure Delivery Plan and will continue to be addressed through planning obligations, infrastructure investment and engagement with relevant service providers.
1483	13968	Leslie Birchall [1483]	Objection to the proposed land allocation at Kirby Cross / Kirby-le-Soken within the Thorpe Road–Mumfords Lane corridor and Strategic Green Gap. The allocation is unsound, conflicts with Policies PPL4 and PPL4a, and lacks a robust ecological evidence base. The site forms part of a functioning ecological network likely to support protected and priority species, including bats and potentially Great Crested Newts. Development would fragment habitats, introduce harmful lighting, and compromise the Strategic Green Gap. In the absence of comprehensive surveys and a deliverable Biodiversity Net Gain strategy, compliance with planning policy and the Habitats Regulations cannot be demonstrated. The site should be removed or deferred pending full ecological assessment.	Object	Ecological impacts, protected species, habitat connectivity and Biodiversity Net Gain requirements will be assessed through detailed ecological surveys and the planning application process. The allocation includes requirements to retain and enhance biodiversity and green infrastructure in accordance with Local Plan and national policy requirements.
1191	13991	Mrs Swanwick [1191]	This is absolute madness to even suggest more housing estates in these areas, we are on our knees with flooding off the fields, pot holes on all our roads, erosion from our coast line's shrinking more and more of our villages!! We have one road in and out from Weeley through Thorpe Le Soken into our areas, enough, please think of the environment the infrastructure and above all our mental health, this is so so stressful	Comment	Flood risk, infrastructure capacity and environmental considerations are being addressed through the wider Local Plan evidence base and policy framework. The allocation forms part of the strategy for meeting identified housing needs in sustainable locations.
1300	14003	Mrs P Ellis [1300]	I have just seen the planning proposal for Kirby Cross Kirby le Soken I am completely amazed more houses in this area No infiltrations, flooding in our gardens No doctor planned for new surgeries, schools, or new hospital planned. It is a disgrace why more houses in this area, there are so many new builds laying empty, walk around & you will see this young people cannot afford deposits for these	Comment	Infrastructure requirements, including healthcare, education, drainage and utilities, are considered through the Infrastructure Delivery Plan and will be addressed through planning obligations and the development management process. The allocation remains justified in delivering the District's identified housing needs.

			properties. Most new builds are 4 &5 beds. No terrace properties to rent etc Crime is getting worse where are the police, no police stations open daily. We are in our late eighties and getting extremely frightened on Local Plan In Kirby le Soken the home in the street is for young offenders I'm told, we were told it was for young who had got thrown out of education ? Please no more houses		
1176	14010	Mr D McDonald [1176]	Objection to the proposed SAH2 development of 420–660 homes between Kirby Cross and Kirby-le-Soken. The site is productive arable farmland, and development would permanently reduce food-producing land and encourage further expansion. Local roads are already congested and unsafe, particularly during peak tourist seasons, with no adequate footpaths or reliable public transport. The proposal fails to demonstrate how utilities, sewerage capacity, healthcare, schools, shops, recreation space or employment opportunities would be provided. Existing GP practices are oversubscribed, no schools or services are planned, and infrastructure disruption would be severe. Serious concerns also remain regarding wildlife protection and habitat loss.	Object	The site has been assessed as part of the wider Local Plan strategy and infrastructure requirements will be addressed through the Infrastructure Delivery Plan and planning application process. Ecological impacts will be subject to detailed assessment and appropriate mitigation.
1328	14018	Sue Hutchinson [1328]	Objection to the loss of the green space between Kirby-le-Soken and Kirby Cross, which currently protects the Backwaters around Horsey Island, a designated Site of Special Scientific Interest. This farmland supports food production, wildlife habitat, and residents' mental wellbeing, and prevents the coalescence of distinct villages. The area already suffers from severe traffic congestion on limited roads, posing risks to emergency access. Development would destroy wildlife habitats, erode village character, increase sewage and water pressures in one of the driest areas of Britain, and worsen existing drainage problems. Green spaces, wildlife corridors and rural identity should be preserved, not replaced by sprawling development.	Object	The allocation includes measures to protect and enhance biodiversity and green infrastructure, whilst impacts on highways, drainage, utilities and local services will be assessed and mitigated through the planning application process and planning obligations where necessary.
1176	14068	Mr D McDonald [1176]	I object to the proposed SAH2 development of 420–660 houses between Kirby Cross and Kirby-le-Soken on the grounds of its scale and location. The site is productive agricultural land, and development would lead to permanent loss and likely future expansion. Local roads are already congested, especially during peak and holiday periods, and lack safe footpaths, with further traffic worsening safety and accessibility. There are no clear plans for essential infrastructure including healthcare, schools, utilities, or employment. Concerns are also raised about wildlife impacts and whether local residents' objections will be properly considered.	Object	Infrastructure, highway, environmental and ecological impacts have informed the site selection process and will be addressed through detailed planning applications, associated assessments and appropriate mitigation measures. All representations will be considered as part of the Local Plan process.
1338	14118	Diana and Ray Kemp [1338]	We write to express our concern about the proposed planning recommendations for Kirby Cross and Kirby-le-Soken. We recently attended a meeting when the reasons for the need of a new area plan were explained, and whilst we have sympathy with the council's view we cannot agree with the proposals being suggested.	Comment	The scale and location of development have been considered through the plan-making process alongside the need to meet housing requirements. Infrastructure provision will continue to be addressed through the Infrastructure Delivery Plan and planning obligations where necessary.

			It would appear that more housing is required throughout the country and, of course, it is only right that this area plays its part, but not to the detriment of its current residents and those to follow. There has already been a sharp increase in new housing without adequate infrastructure in place to cope with increased numbers. Road access to this area is limited and any change to this would seem unlikely. Medical and educational services would undoubtedly be inadequate for a further large increase in population. Work opportunities locally are also very limited. Is there any guarantee that funds would be made available to provide sufficient improvements to the infrastructure prior to any building commencing? It seems to us that sacrificing yet more countryside for building (SAH2) on such a large scale cannot be justified simply to meet Government targets. The community deserves better and over development should not be an option. It is also disappointing to note the proposals for Kirby-le-Soken, in particular building along Walton Road (MSA17). Building further houses accessing an already busy road is not ideal. It seems that Kirby-le-Soken is slowly creeping to join Walton. It's important that our villages keep their identity for the benefit of the whole area. We hope that further consideration will be given to the Planing Policy and a reduction in house quantity be made.		
995	14148	Sue and Ian Bruce [995]	My comments on development in Kirby Cross reflect long-term concerns about the scale of change within what was once a distinct village. Over many years, significant building has led to increased traffic congestion and the merging of separate parts of Kirby, without corresponding improvements in local services such as healthcare. There are concerns that infrastructure, including hospital provision, is already under strain, while many new homes remain unaffordable or unsold. Additional issues include loss of agricultural land, reduced parking, narrow estate roads affecting emergency access, and lack of sustainable design. Overall, further large-scale development would worsen these pressures and erode the area's character.	Comment	Infrastructure capacity, healthcare provision and transport impacts have been considered through the preparation of the Local Plan and will continue to be addressed through the Infrastructure Delivery Plan, planning obligations and detailed development proposals.
1078	14154	Miss Pauline Lovell [1078]	Already Wittonwood Rd has daily congestion with street parking because of the railway station, school and side roads. Branscombe Close is a narrow road and has a public footpath leading to allotments which has cars using it for access. Environmental impact on wildlife in the area.	Object	Highway impacts, access arrangements, biodiversity and ecological matters will be assessed through the planning application process and addressed through the policy requirements and any necessary mitigation measures.
1330	14161	Colin Harris [1330]	I object to Meer meadow as this is the last green space in Frinton. The meadow is home to foxes, deer, squirrels, reptiles etc. Also concerned about the construction traffic.	Object	Biodiversity impacts, habitat protection and construction-related effects will be assessed through the planning application process and addressed through the relevant policy requirements and mitigation measures where necessary.
593	14197	Mrs Angela S. Hillier [593]	The response raises multiple concerns about proposed housing sites. Several rely on single-track roads with no pavements,	Comment	The Council acknowledges the concerns regarding infrastructure, highways, flood risk and agricultural land. These matters have been

			particularly off Malting Lane, which could require road widening, disrupt access to the local tip, increase fly-tipping, and place pressure on waste facilities. Increased traffic on Kirby Road would worsen existing congestion, especially at the Walton/Frinton Road junction and during frequent roadworks. Concerns are also raised about building on land formerly within the Coastal Protection Belt, including potential flood risk. Large developments on farmland would reduce food production and harm farming viability. There should be genuinely affordable homes for local people and mandatory, meaningful solar panel provision on all new homes. The previous letter outlines issues relating to infrastructure, including a lack of doctors, banks, public transportation, and roads. Infrastructure must be upgraded to cope with development.		considered through the Local Plan evidence base and will be addressed through detailed planning applications, infrastructure planning and relevant policy requirements.
1285	14216	Mrs M Cunningham [1285]	There will be a shortage of Drs, dentists, police, ambulances, schools, transport, dustman and fireman. Impact on water and electricity. Affect on wildlife and nature.	Comment	The impacts of development on healthcare, education, emergency services, utilities and biodiversity will be considered through the planning application process and addressed through planning obligations and infrastructure planning where necessary.
1288	14533	Jules Young [1288]	I am writing to formally object to the scale, strategy and site selection of the proposed residential developments within the Frinton, Walton and Kirby area. While I recognise the need for housing delivery, I strongly object to the overall quantum of development proposed for what is, in reality, a small coastal community with limited infrastructure capacity. Sewerage and drainage capacity, Road network and traffic congestion, Healthcare provision, School places. Environmental impact.	Object	The allocation forms part of a balanced strategy for meeting housing needs, and impacts relating to drainage, highways, healthcare, education and the environment will be addressed through the Infrastructure Delivery Plan, planning obligations and detailed planning applications.
1496	14538	Donna Barfield [1496]	I write to formally object to the proposed allocation of land within the Kirby Cross / Kirby-le-Soken area as identified within the Tendring District Local Plan Preferred Options Consultation. This objection is made on the grounds that the proposed allocation is unsound, fails to comply with relevant local and national planning policy, and is not supported by an adequate ecological evidence base. This representation concerns land within the Thorpe Road - Mumfords Lane corridor and the wider Strategic Green Gap. The objection is made with reference to: Strategic Policy PPL4 - Biodiversity and Geodiversity Policy PPL4a - Biodiversity Net Gain National Planning Policy Framework (NPPF) The Conservation of Habitats and Species Regulations 2017 (as amended)	Object	Biodiversity, habitat protection, ecological connectivity, Biodiversity Net Gain and Habitats Regulations matters are addressed through Policies PPL4 and PPL4a and will be subject to detailed assessment at the planning application stage. The allocation remains considered appropriate subject to compliance with the policy framework and necessary mitigation measures.

Policy SAH2: Development North of Thorpe Road, Kirby Cross

Summary of Representations

Representations on Policy SAH2 focused primarily on infrastructure capacity, healthcare provision, biodiversity and ecological impacts, Green and Blue Infrastructure, impacts on Habitats Sites, flood risk, transport and active travel connectivity, loss of agricultural land, settlement character and the principle of development between Kirby Cross and Kirby-le-Soken. A number of respondents raised concerns regarding biodiversity, the Strategic Green Gap, protected species and compliance with the Habitats Regulations, whilst others highlighted pressure on local healthcare, education, highways and utility infrastructure. Technical stakeholders supported the allocation subject to strengthened policy requirements relating to healthcare provision, SANG mitigation, Green and Blue Infrastructure, active travel connectivity, sports provision and enhancement of the Public Rights of Way network. The Council concluded that the allocation remains a suitable and sustainable location for growth, with impacts capable of being appropriately mitigated through policy requirements, planning obligations, ecological assessment and infrastructure delivery.

In response to representations submitted, changes have been made to Policy SAH2. With regard to infrastructure, the policy was amended to require contributions towards healthcare infrastructure and the delivery of healthcare provision commensurate with the scale of development, in consultation with the NHS/ICB. Additional policy wording was incorporated to promote active travel and strengthen connections to the wider countryside, surrounding settlements and the existing Public Rights of Way network. Similarly, the policy was strengthened to support the retention and enhancement of Footpath 17, provision of a multi-user route, and improved integration with the wider rights of way network. The policy and/or supporting text were amended to encourage opportunities to extend or enhance existing sporting provision at Kirby Playing Fields where feasible. Clarification was provided that infrastructure requirements will be secured through planning obligations and delivered in a phased manner where justified. To address environmental considerations, the policy was strengthened to require the provision of Suitable Alternative Natural Greenspace (SANG) at an appropriate scale, having regard to Policy PPL4, Natural England guidance and the site's proximity to Habitats Sites. Additional policy wording was included to secure the delivery and long-term management of recreational disturbance mitigation in accordance with the Essex Coast RAMS/Essex Coast Bird Aware strategy.

The policy was also amended to strengthen Green and Blue Infrastructure requirements, including greater emphasis on the retention, enhancement and integration of ecological and amenity features within a multifunctional network. The policy was updated to better align with the requirements and objectives of Policies PPL4 and PPL4a and support delivery of priorities identified within the Essex Local Nature Recovery Strategy. However, no changes were made to the scale of development, the allocation boundary or the overall strategy for the site. Furthermore, no changes were made in response to objections relating to agricultural land loss, the principle of development, the Strategic Green Gap designation, heritage impacts, ecological survey requirements at allocation stage or flood risk, as the Council concluded that these matters could be appropriately addressed through the existing policy framework, supporting evidence and development management process.

Policy SAH3: Development of Land Off Arthur Ransome Way, Walton

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
1654	13511	Natural England (Jonathan Burt) [1654]	This site allocates 200 new residential dwellings on a site less than 600m from Hamford Water SPA. As such, Natural England advice is that this site will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites and will require a minimum of 3.84ha of semi-natural accessible open space of SANG standard, other than the requirement for a 2.3km circular walk. Instead, the accessible semi-natural greenspace should aim to provide a circular walk of a length that is appropriate for the size of the greenspace. Please note that the site allocation may also be Functionally Linked Land, and a desk study and wintering bird surveys will be required to rule this out, or to inform mitigation requirements.	Comment	The Council notes the range of concerns raised in respect of Policy SAH3, including those relating to potential impacts on designated ecological sites, priority habitats, flood risk, landscape sensitivity, infrastructure capacity, and the suitability of the site for development. Following consideration of representations received at the Preferred Options (Regulation 18) stage, together with further review of the evidence base and engagement with relevant statutory consultees, the Council has decided to remove Site Allocation SAH3 (Land off Arthur Ransome Way, Walton-on-the-Naze) from the Local Plan. This decision reflects significant concerns regarding the ecological sensitivity of the site, particularly its proximity to Hamford Water SPA, SAC and Ramsar site, and the potential for adverse effects on internationally and nationally designated habitats, including through recreational disturbance and impacts on functionally linked land. The site has also been identified as one of the more environmentally constrained allocations, with potential impacts on priority habitats and protected species. In addition, the Council has had regard to concerns relating to flood risk, landscape sensitivity within the Hamford Coastal Slopes character area, and the suitability of the site in the context of coastal protection considerations. While infrastructure matters, including highways, drainage and community services, were also raised, the primary reason for the removal of the site relates to the environmental constraints and the significant mitigation that would be required, which would in turn affect the deliverability and overall suitability of the allocation. The removal of SAH3 results in a reduction in the level of growth proposed for the Frinton, Walton and Kirby Cross area. The Council considers that this reduction will help to alleviate potential pressures on local infrastructure and respond positively to concerns raised by the local community, while ensuring that the Local Plan remains balanced and deliverable.
823	13572	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. "f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network."	Comment	

826	14499	Essex Wildlife Trust (Annie Gordon) [826]	We consider SAH3 to be one of the most ecologically problematic site allocations in the plan and wish to draw the Council's particular attention to this site. The ISA Annex C assessment (Table 49) records that the site borders coastal and floodplain grazing marsh Priority Habitat to the north, that it is within the IRZ of a nearby SSSI and Habitats site, and that it falls within the Hamford Coastal Slopes landscape character area, which is identified as 'highly sensitive to development.' The HRA Screening Report classifies SAH3 at Category C — the highest level of concern — due to potential LSE on Hamford Water SPA, SAC and Ramsar site across multiple impact pathways including impacts on functionally linked land, recreational disturbance, and water quality. We are concerned that the adjacency of this site to coastal grazing marsh priority habitat represents a fundamental ecological constraint that is not adequately addressed in the allocation policy. Coastal and floodplain grazing marsh is an irreplaceable or near-irreplaceable habitat in ecological terms — it supports populations of Lapwing, Redshank, Snipe, and other wader species, and forms part of the functional habitat for SPA qualifying features, including Dark-bellied Brent Geese and Golden Plover using the Hamford Water complex. Development on the northern edge of this site risks permanent fragmentation of the grazing marsh—coast ecological gradient, creating an urban edge effect that would significantly degrade the quality of the adjacent priority habitat even where the habitat itself is not directly built upon. The allocation policy includes requirements for wintering bird surveys, pre-commencement SPA bird habitat creation, 20% BNG, and LNRS alignment, and we acknowledge these positive elements. However, the policy does not include a mandatory ecological buffer on the northern boundary of the site, nor does it specify a minimum standoff distance from the grazing marsh/priority habitat. We consider that a minimum 50-metre undeveloped ecological buffer on the northern boundary of the allocation, secured as part of BNG and managed as priority habitat in perpetuity, should be a non-negotiable requirement of this allocation. We also note that the ISA records this site as Grade 2 Agricultural Land Classification — the highest quality agricultural land in the allocation programme. NPPF paragraph 187(b) requires that planning decisions recognise the economic and other benefits of the best and most versatile agricultural land. Grade 2 land is, by definition, BMV land and should only be developed where there is no reasonable alternative. The plan does not demonstrate that this site has been preferred over lower-quality agricultural alternatives on ecological and agricultural land quality grounds. In light of all of the above, we formally object to the inclusion of SAH3 in the plan unless and until the Council can demonstrate,	Object	

			through the completed Appropriate Assessment, that adverse effects on the integrity of Hamford Water SPA, SAC and Ramsar site can be definitively ruled out, and unless the allocation policy is strengthened to require a minimum 50-metre ecological buffer on the northern boundary.		
148	14515	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Strategic Housing allocation contains areas of the site at medium and high risk of flooding from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	
Businesses, Landowners and Developers					
705	4187	Mr Peter Le Grys [705]	Question why development proposed east of Coles Lane makes no reference to significant intrusion into coastal protection belt.	Object	The Council notes the range of concerns raised in respect of Policy SAH3, including those relating to potential impacts on designated ecological sites, priority habitats, flood risk, landscape sensitivity, infrastructure capacity, and the suitability of the site for development. Following consideration of representations received at the Preferred Options (Regulation 18) stage, together with further review of the evidence base and engagement with relevant statutory consultees, the Council has decided to remove Site Allocation SAH3 (Land off Arthur Ransome Way, Walton-on-the-Naze) from the Local Plan. This decision reflects significant concerns regarding the ecological sensitivity of the site, particularly its proximity to Hamford Water SPA, SAC and Ramsar site, and the potential for adverse effects on internationally and nationally designated habitats, including through recreational disturbance and impacts on functionally linked land. The site has also been identified as one of the more environmentally constrained allocations, with potential impacts on priority habitats and protected species. In addition, the Council has had regard to concerns relating to flood risk, landscape sensitivity within the Hamford Coastal Slopes character area, and the suitability of the site in the context of coastal protection considerations. While infrastructure matters, including highways, drainage and community services, were also raised, the primary reason for the removal of the site relates to the environmental constraints and the significant mitigation that would be required, which would in turn affect the deliverability and overall suitability of the allocation.
1163	14084	Cllr Anne and Pierre Oxley [1163]	I formally object to the proposed housing allocations in Walton-on-the-Naze, Frinton, Kirby-le-Soken and Great Holland. The sites fail the Local Plan soundness tests and conflict with national planning policy due to inadequate infrastructure capacity, unsustainable locations reliant on car travel, highway and traffic impacts, flood risk, loss of greenfield land, and harm to community character. The cumulative impacts on services, transport and the environment are not properly assessed, and site deliverability is uncertain. I ask that the scale and location of these allocations be reconsidered before the Local Plan progresses.	Object	
1485	14107	Titchmarsh Marina (John Fletcher) [1485]	I wish to object to the proposal to build 200 houses between the Martello development and Coles Lane. The reasons for my objection are:- 1. Since 1923/4 at least 838 houses have been built in the Walton, Frinton and Kirby area. There has not been any additional Doctors or schools to service the population increase, 2. The area seaward of Wade Reach was not in the Tendring Building development area – when was the bondar changed? 3. The site from Wade reach and all of Hamford Water is an SSSI site (Site of Special Scientific Interest) and on the edge of an SPA (Special Protection Area) A housing development could damage both. 4. As an alternative it may be possible to build a few hoses adjacent	Object	

			to the Martello development – that area has already been spoilt. 5. Tendring Peninsular is getting clogged up with building developments – as a coastal/ rural area many people enjoy visiting the area. Clogging it up with houses `could have an economic effect and damage the holiday trade. I do hope that this idea will be discarded.		The removal of SAH3 results in a reduction in the level of growth proposed for the Frinton, Walton and Kirby Cross area. The Council considers that this reduction will help to alleviate potential pressures on local infrastructure and respond positively to concerns raised by the local community, while ensuring that the Local Plan remains balanced and deliverable.
1530	14301	Berrys (Lauren May, Senior Planning Consultant) [1530]	This representation discusses reasons why in our view the proposed allocation at land off Arthur Ransome Way, Walton. The key reason for this is that there is a lack of justification for the removal of the site from the Coastal Protection Zone.	Object	
Community Representatives					
953	3543	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	The Council notes the range of concerns raised in respect of Policy SAH3, including those relating to potential impacts on designated ecological sites, priority habitats, flood risk, landscape sensitivity, infrastructure capacity, and the suitability of the site for development. Following consideration of representations received at the Preferred Options (Regulation 18) stage, together with further review of the evidence base and engagement with relevant statutory consultees, the Council has decided to remove Site Allocation SAH3 (Land off Arthur Ransome Way, Walton-on-the-Naze) from the Local Plan. This decision reflects significant concerns regarding the ecological sensitivity of the site, particularly its proximity to Hamford Water SPA, SAC and Ramsar site, and the potential for adverse effects on internationally and nationally designated habitats, including through recreational disturbance and impacts on functionally linked land. The site has also been identified as one of the more environmentally constrained allocations, with potential impacts on priority habitats and protected species. In addition, the Council has had regard to concerns relating to flood risk, landscape sensitivity within the Hamford Coastal Slopes character area, and the suitability of the site in the context of coastal protection considerations. While infrastructure matters, including highways, drainage and community services, were also raised, the primary reason for the removal of the site relates to the environmental constraints and the significant mitigation that would be required, which would in turn affect the deliverability and overall suitability of the allocation. The removal of SAH3 results in a reduction in the level of growth proposed for the Frinton, Walton and Kirby Cross area. The Council considers that this reduction will help to alleviate potential pressures on local
1175	14438	ONTRACK Tendring Transport Users (John Smock) [1175]	It is fortunate that the development of the rail network in the 19th century resulted in there being three stations to serve this area. Thus most of the town is within walking distance of a station, the major exception being Kirby-le-Soken. The development proposed for Kirby Cross (SAH2) is generally very convenient for access to buses and the railway at Kirby Cross station. The station certainly does need improvements – it is an exceptionally bleak place in which to wait for a train in wintry weather on either platform. While a bus/rail interchange is highly desirable, it is unfortunate that modern developments have been allowed to encroach on the car parking space so that it is very difficult for a bus to manoeuvre in the space remaining and this would lose much of the car parking spaces; currently is seems to be normal for rail replacement buses to stop on the main road and not go into the station entrance. Similarly, the development proposed for Walton-on-the-Naze (SAH3) is generally convenient for Walton station. However the proposed station car park development would lose the facility to park ones car at the station, also it appears to encroach very close to the existing railway. As mentioned above, it is important to retain the ability to construct a second platform at some point in the future – not necessarily during the duration of the next Local Plan but possibly succeeding plans (there are far too many examples in Tendring where developments have been permitted to take up land which would have been useful for transport improvements, both road and rail: considerable long-term forethought is necessary in planning).	Comment	

258	13613	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	We remain neutral on this allocation although believe this site relates well to its position within the built environment of Walton. We however believe the policy should contain reference to contributions to highways improvements and public transport provision. Other proposed sites are relatively small and proportional to the areas they are located in. We do not wish to put forward any alternative sites than those being consulted on and suggest that individuals both Councillors and residents put forward any sites with their reasoning. On Behalf of members of Frinton & Walton Town Council, I thank you for your consideration to our comments.	Comment	infrastructure and respond positively to concerns raised by the local community, while ensuring that the Local Plan remains balanced and deliverable.
Members of the Public					
1065	3743	Mrs Helen Dix [1065]	SAH2 SAH3 Local residents identified sever sewerage problems from too many new houses. Thorpe through to Walton:- end of the line. Infrastructure here is finite. You cannot continue building more and more houses in these villages without consequences. No improvements or benefits to services seen from the large developments Laurels Finches Park/Samphire Meadows already built. More congestion and extra traffic flow during summer months from visitors. Destroying a beautiful area of landscape, prime farmland, footpaths thus depriving residents of benefits to mental health and wellbeing. Loss of wildlife habitat:- Adders, Grass snakes, which are on the European protection list.	Object	The Council notes the range of concerns raised in respect of Policy SAH3, including those relating to potential impacts on designated ecological sites, priority habitats, flood risk, landscape sensitivity, infrastructure capacity, and the suitability of the site for development. Following consideration of representations received at the Preferred Options (Regulation 18) stage, together with further review of the evidence base and engagement with relevant statutory consultees, the Council has decided to remove Site Allocation SAH3 (Land off Arthur Ransome Way, Walton-on-the-Naze) from the Local Plan. This decision reflects significant concerns regarding the ecological sensitivity of the site, particularly its proximity to Hamford Water SPA, SAC and Ramsar site, and the potential for adverse effects on internationally and nationally designated habitats, including through recreational disturbance and impacts on functionally linked land. The site has also been identified as one of the more environmentally constrained allocations, with potential impacts on priority habitats and protected species. In addition, the Council has had regard to concerns relating to flood risk, landscape sensitivity within the Hamford Coastal Slopes character area, and the suitability of the site in the context of coastal protection considerations. While infrastructure matters, including highways, drainage and community services, were also raised, the primary reason for the removal of the site relates to the environmental constraints and the significant mitigation that would be required, which would in turn affect the deliverability and overall suitability of the allocation. The removal of SAH3 results in a reduction in the level of growth proposed for the Frinton, Walton and Kirby Cross area. The Council considers that
576	3704	Mrs Angela Henshall [576]	Objection to Walton SAH3. The area lacks infrastructure, services & employment needed to support an additional 200 homes. Most residents would need to commute & travel times are long, making it unsuitable for working families. Walton's geographical location also makes it unlikely that significant new businesses will establish themselves locally. Walton is not "thriving", local shops struggle and many residents travel to Frinton-on-Sea to shop; 200 houses will not change this. Housing demand is questionable, with some Walton properties listed on Rightmove since March 24. Anti-social behaviour is an issue, with very limited police presence and no CCTV.	Object	

1033	3692	Mrs Kim Shaw [1033]	*Where will those who live in these houses work? * Roads out of the area are already exceedingly congested in the mornings and evenings, including the A12 which is an eyesore: the verges are completely littered with plastic rubbish. * In all these developments, Swift bricks, Hedgehog highways and water saving measures appear to have been completely ignored in favour of throwing up cheap and cheerful housing that will not last, so wasting valuable resources. * With the current low status given to trades and the focus on education league tables, how will anyone find decent tradesmen to build them?	Comment	this reduction will help to alleviate potential pressures on local infrastructure and respond positively to concerns raised by the local community, while ensuring that the Local Plan remains balanced and deliverable.
1059	3732	Mr Matthew Sutton [1059]	Policy SAH3 allocates 200 dwellings at Walton-on-the-Naze with no healthcare infrastructure requirement - the only allocation in the plan with no NHS/ICB contribution clause. Walton has a significant elderly population and pressured primary care. Adding 200 dwellings with no commitment to address healthcare capacity is unacceptable and inconsistent with every other major allocation in this Local Plan. The policy must be amended to require healthcare contributions secured through s106 or CIL, equivalent to provisions applied elsewhere.	Object	
1337	3984	Captain Andrew Rudge [1337]	Preservation of the rare Fisher's Estuarine Moth and Sea Hogs Fennel plant. Currently the stronghold for this rare species of moth is on Skippers Island. This is habitat is under threat from sea level rises and coastal erosion. The Fisher’s Estuarine Moth life cycle is totally dependent on Sea Hogs fennel (a rare protected perennial plant only found in a few UK locations) .We have a unique responsibility to protect this sea fennel found on Skippers Island , parts of the Naze and the farmland now proposed to be developed at SAH3.	Comment	
1337	3997	Captain Andrew Rudge [1337]	I object to development of land shown on map SAH3 as it will be detrimental to the very rare species Sea Hogs fennel and its dependent Fisher's Estuarine Moth currently found on Skippers Island, The Naze and fields designated to SAH3. See "Fisher's Estuarine Moth Breeding Programme - Colchester Zoological Society. In addition it will reduce road safety at the already dangerous T junction between Elliots Drive and Kirby Road. It will destroy the feeding ground of migratory birds and other species that feed on the grasslands around Coles Lane and in fields designated to SAH3.	Object	
353	4348	Mr Robert Pomery [353]	The respondents support the allocation of site SAH3 for up to 200 homes as a logical extension of the settlement that respects local character, landscape, and heritage. They acknowledge the need for collaboration with the Council and community to ensure sustainable development. Technical and environmental	Support	

			assessments show no constraints preventing development, though further ecological surveys are planned. The site is well connected to local services, transport links, and amenities within walking distance. Landscape impacts can be mitigated through careful design. Overall, the proposal offers an opportunity to deliver high-quality housing and open space while integrating with the existing community.		
1732	13426	Mr Raymond Preston [1732]	I am writing as a resident to formally raise my concerns regarding the proposed housing development on the land off Arthur Ransome Way and its possible inclusion within the local plan. Development on this land risks damaging habitats and reducing biodiversity, which would be a significant loss for both residents and the environment. I am also very concerned about the effect this development would have on Lowe Chase itself. This is a narrow and quiet residential road which currently serves a small, settled community. It is not designed to accommodate a substantial increase in vehicle movements. A development of around 200 homes would inevitably place further strain on local services and infrastructure. Schools, GP surgeries, emergency services, and other community facilities are already under pressure, and any large-scale increase in population would need to be matched by proper investment in those services. I am also concerned that the current proposal may represent only the first stage of a wider expansion. Although the number of homes presently referred to is around 200, the overall land area appears capable of supporting more extensive development in the future.	Object	
1168	13641	Mr Timothy Oxley [1168]	The proposal to build 200 homes off Arthur Ransome Way is opposed due to its location within the Coastal Protection Belt and proximity to the Hamford Water Nature Reserve and SSSI-designated Walton Backwaters. Development would harm valued landscapes, wildlife habitats, and biodiversity. The area lacks adequate infrastructure, with limited road access unable to support additional traffic. Flood risk, poor drainage, and insufficient sewage capacity would likely worsen, increasing environmental harm. The elevated site would disrupt the natural landscape character and conflict with planning policies. Overall, the development is considered unsustainable, unjustified, and detrimental to both the environment and local community.	Object	
1185	13702	Pauline Gibbons [1185]	This development risks the character, wildlife, and quality of life for residents. An additional 200 homes would increase pressure on local infrastructure and services, compromising the safety of vulnerable residents. Additionally, allocating 20 to 30% of development to social/affordable housing may not align with the character of the coastal area. The Council should rethink this development within the Local Plan.	Object	

1249	13710	Robin Cooper [1249]	I am emailing to strongly object to the proposed development North of Wade Read, Walton on Naze. Photos are attached showing concerns regarding traffic, road safety, and parking in the local area.	Object	
1322	13732	Joan Overett [1322]	I am writing to register my strong objections to further development near Arthur Ransome Way. The site proposed for 200 new dwellings is affected by floodwater and nearby houses developed by Taylor Wimpey some 6 or 7 years ago have been built on piles some 3.5 metres higher than the recently identified site. Should housing not be built on brownfield sites, which could be developed on to improve the local landscape whilst meeting housing needs? The state of roads and traffic is a major concern in the area, and local services are already under a lot of pressure. Please consider these objections before making any decision on the proposed development.	Object	
1240	13737	Maddie Kidby [1240]	I am writing this email in rejection to the planning of 200 houses behind Wade Reach in Walton on the Naze . This is an area of outstanding beauty with views to the Twizzle and back waters. The wildlife that lives in this area includes, muntjac, hares , rabbits, bats, various sea birds. The infrastructure for Walton and the area is not there to support thousands of more residents The local doctors surgery's and dentists are at breaking point. There has been no more schools added to the area. The roads are a danger and will only get worse in the summer months when tourists are here. This building will add pressure to Thorpe le soken and lower Kirby roads as access roads these are already so congested. Walton has expanded with the Hamford Estate and the Samphire meadows estate over the last few years, this is more than enough development for the infrastructure that is in place.	Object	
1529	13762	Dawn Baran [1529]	SAH3 is opposed due to its location within a high-risk Zone 3 flood area and the reclassification of land from Coastal Protection Belt to settlement, which could increase future flood and erosion risks. There are serious concerns about harm to protected habitats, particularly Sea Hog’s Fennel and the rare Fisher’s Estuarine Moth, subject to active conservation efforts. The proposal is also seen as threatening migratory bird feeding grounds and undermining aspirations for UNESCO or heritage recognition of this environmentally significant coastal area.	Object	
1262	13764	Mrs Carol Cooper [1262]	The housing allocation in Walton-on-the-Naze, lies outside the development boundary and would conflict with multiple Tendring policies. It raises concerns over serious harm to wildlife (including bats), loss of agricultural land, and impacts on the nearby RAMSAR-designated Walton Backwaters. The proposal will worsen flooding risks, traffic congestion, and pressure on already overstretched schools, healthcare, water and sewage systems. The development is unsuitable for local housing needs, damaging to rural character and biodiversity, and likely to set a precedent for further harmful expansion.	Object	

1242	13768	Ronnie Rowlingson [1242]	I am writing this email in rejection to the planning of 200 houses behind Wade Reach in Walton on the Naze This is an area of outstanding beauty with views to the Twizzle and back waters. The wildlife that lives in this area includes, , muntjac , hares, , rabbits , bats, various sea birds The infrastructure for Walton and the area is not there to support thousands of more residents The local doctors surgery's and dentists are at breaking point. There has been no more schools added to the area. The roads are a danger and will only get worse in the summer months when tourists are here This building will add pressure to Thorpe le soken and lower Kirby roads as access roads , these are already so congested Walton has expanded with the Hamford Estate and the Samphire meadows estate over the last few years , this is more than enough development for the infrastructure that is in place	Object	
1249	13772	Robin Cooper [1249]	I am emailing to strongly object to the proposed development North of Wade Read, Walton on Naze. I was unable to access the TDC Planning Portal so am emailing a letter (attached) with comments and photos (attached). Photos illustrate points about the difficult road access conditions where access would be needed for the proposed development.	Object	
1290	13781	Duffy Gregory [1290]	There is strong concern about the proposed 200 home development at Wades Reach, Coles Lane, Walton on the Naze, primarily due to its potential impact on a Site of Special Scientific Interest (SSSI). While infrastructure pressures are acknowledged, the key objection focuses on irreversible harm to biodiversity and protected habitats. The area's SSSI designation reflects its national ecological importance under the Wildlife and Countryside Act. Has Natural England has been properly consulted? Has consent has been granted? There is a request for greater transparency to ensure the development would not damage the site's conservation status.	Comment	
1239	13839	Oscar Rowlingson [1239]	I am writing this email in rejection to the planning of 200 houses behind Wade Reach in Walton on the Naze This is an area of outstanding beauty with views to the Twizzle and back waters. The wildlife that lives in this area includes, , muntjac , hares , rabbits , bats, various sea birds . The infrastructure for Walton and the area is not there to support thousands of more residents The local doctors surgery's and dentists are at breaking point. There has been no more schools added to the area. The roads are a danger and will only get worse in the summer months when tourists are here . This building will add pressure to Thorpe le soken and lower Kirby roads as access roads, these are already so congested Walton has expanded with the Hamford Estate and the Samphire meadows estate over the last few years, this is more than enough development for the infrastructure that is in place .	Object	
1257	13842	Thomas Lord [1257]	Objection to the proposal for 200 houses at Wades Reach/Coles Lane. The site has a history of flooding, lies close to the Coastal Belt and Hamford Water Nature Reserve, and raises serious concerns over flood risk, climate change resilience, wildlife impact and long term viability. Local roads are already in poor condition and unable to cope with additional traffic, while healthcare, schools, sewerage	Object	

			and emergency services are overstretched. Promised infrastructure from previous developments has not materialised. The site is poorly accessible, environmentally sensitive and unsustainable, and should not be allocated for development.		
983	13845	Mr Richard Barnes [983]	Objection to the Local Plan proposal as it represents a disproportionate and unsustainable expansion of Kirby le Soken, contrary to local and national planning policy. The scale of development conflicts with the village's designation as a Small Rural Settlement and encroaches into open countryside. It would place severe pressure on already over-capacity healthcare and education services, significantly worsen traffic on the constrained B1034, and create a car-dependent development. The proximity to Hamford Water poses serious risks to protected habitats, biodiversity, and green gaps that define settlement identity. The harm clearly outweighs any benefits.	Object	
1241	13902	Frances Walker [1241]	I am writing to strongly oppose the building of 200 houses in Walton on the Naze. As a really deprived area, poor infrastructure, overladen Doctors, Dentists and schools when does the council deem to stop and say enough is enough? The government wants to build regardless of the thought process into overcrowding an area with serious sea barrier protection and underfunded ongoing facilities. 200 houses means at least 400 cars, 800 children. The roads are potholed nightmares on main and housing areas, the shopping amenities are inadequate in relation to all the new and already agreed planning and building going on. Why in the planning stage, facilities are promised but very rarely carried out to the letter on completion? My objection is against this and any planning in this area, it's not sustainable with the infrastructure we have which is overloaded plus it needs to be taken into account the amount of sewage that is constantly shipped out of the area on a regular basis or pumped into the sea. We are a seaside place where people come to holiday. A place where it relies on tourist money to survive.	Object	
1173	13913	Debbie Wilkinson [1173]	I strongly object to the 200?home proposal at Wades Reach/Coles Lane, the site is an unsafe floodplain location, too close to the protected Hamford Water SSSI/SPA/Ramsar, and harmful to rare and sensitive wildlife. I have concerns about environmental impact, rising sea levels, drainage, road capacity, construction access, and inadequate local infrastructure and services. The site is overdeveloped, poorly accessible, and risks worsening flooding for existing homes. I request the council to abandon the allocation and select alternative land.	Object	
1263	13919	Douglas Hodgson [1263]	Objection to development on Coastal Protection Belt land north of Walton-on-the-Naze, arguing it would cause unacceptable harm to a nationally valued coastal landscape and the setting of Hamford Water National Nature Reserve. The proposal would be visually intrusive, undermine coastal protection policies, and risk precedent-setting encroachment into open countryside. It also threatens sensitive habitats and bird species through disturbance and lighting. Existing flood risk, drainage, transport and sewerage constraints, alongside high infrastructure and viability costs, mean	Object	

			the site is neither deliverable nor sound and should be excluded from the Local Plan.		
1061	13943	Ken & Sheila Pigram [1061]	Objection to the proposed development of 200 homes behind Wade Reach, between Hamford Park and Coles Lane. While national housing targets are recognised, local infrastructure in Walton on the Naze is already inadequate, with overstretched GP services, a primary school at capacity, poor roads and footpaths, and limited employment opportunities. Two large nearby housing developments remain under construction with unsold properties. The site's proximity to Hamford Water raises serious ecological concerns for wildlife and migrating birds. The land is prone to waterlogging and flooding, and further development risks worsening drainage, raising the water table and harming neighbouring properties.	Object	
535	13948	Mr Michael Field [535]	SAH3 directly affects views and landscapes of 53 properties. I wish to put forward 3 possible alternatives on the main Kirby Rd, North side, also a further suggestion to create a strategic green gap.	Comment	
1243	13960	Serena Rowlingson [1243]	To whom it may concern I am writing this email in rejection to the planning of 200 houses behind Wade Reach in Walton on the Naze . This is an area of outstanding beauty with views to the Twizzle and back waters. The wildlife that lives in this area includes, muntjac, hares, , rabbits, bats, various sea birds . The infrastructure for Walton and the area is not there to support thousands of more residents The local doctors surgery's and dentists are at breaking point. There has been no more schools added to the area. The roads are a danger and will only get worse in the summer months when tourists are here . This building will add pressure to Thorpe le soken and lower Kirby roads as access roads , these are already so congested Walton has expanded with the Hamford Estate and the Samphire meadows estate over the last few years, this is more than enough development for the infrastructure that is in place .	Object	
1257	14097	Thomas Lord [1257]	Objection to the proposal for 200 homes at Wades Reach/Coles Lane. Walton's infrastructure is already inadequate, with unresolved highway improvements, deteriorating local roads, traffic bottlenecks, overloaded sewerage systems, and limited healthcare and school capacity. The site lies on a floodplain, close to Hamford Water Nature Reserve and the Coastal Belt, raising serious concerns about flooding, sea-level rise, environmental harm, wildlife loss, pollution, and residents' wellbeing. Construction would worsen traffic and road damage and risks long-term unviability and high insurance costs. The proposal is unsustainable and should be reconsidered in favour of more appropriate, accessible sites.	Object	
593	14198	Mrs Angela S. Hillier [593]	The response raises multiple concerns about proposed housing sites. Several rely on single track roads with no pavements, particularly off Malting Lane, which could require road widening, disrupt access to the local tip, increase fly tipping, and place pressure on waste facilities. Increased traffic on Kirby Road would worsen existing congestion, especially at the Walton/Frinton Road junction and during frequent roadworks. Concerns are also raised about building on land formerly within the Coastal Protection Belt,	Comment	

			including potential flood risk. Large developments on farmland would reduce food production and harm farming viability. There should be genuinely affordable homes for local people and mandatory, meaningful solar panel provision on all new homes. The previous letter outlines issues relating to infrastructure, including a lack of doctors, banks, public transportation, and roads. Infrastructure must be upgraded to cope with development.		
1697	14210	Karen Lilley [1697]	Environmental This are is so close to Hamford Water and the Estuary and would this building disturb the wildlife - seals in particular. In the field, are muntjac deer, hares, rabbits, heron, egrets, sparrow hawks, Marsh Harriers, bats, pheasants, and partridges. Noise and Dust - Air pollution We have prevailing NE winds. When the Aldi/M25 and housing development went up we had to keep windows closed. No washing out to dry, the dust was everywhere for weeks. This is also a dementia care home on the out skirts of the proposed development. Residents enjoy the fresh air and calming views over the backwaters. Infrastructure All these new homes and no plans for new school, doctors, dentists, roads, coping with increased traffic.	Object	
1288	14534	Jules Young [1288]	I am writing to formally object to the scale, strategy and site selection of the proposed residential developments within the Frinton, Walton and Kirby area. While I recognise the need for housing delivery, I strongly object to the overall quantum of development proposed for what is, in reality, a small coastal community with limited infrastructure capacity. Sewerage and drainage capacity, Road network and traffic congestion, Healthcare provision, School places. Environmental impact.	Object	

Policy SAH3: Development of Land Off Arthur Ransome Way, Walton

Summary of Representations
Site SAH3 has been removed from the Local Plan following Regulation 18 consultation due to significant ecological and environmental constraints, including proximity to Hamford Water SPA and impacts on sensitive habitats. Its removal reduces housing numbers in the area and helps address concerns regarding environmental impact and infrastructure pressure.

Policy SAH4: Development of Land East of Church Road, Brightlingsea

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3651	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	SAH4 contains FP2 running through the allocation and Byway 1 forming a multi-user spine to the east, creating a clear opportunity to deliver a safe, coherent access network. The site narrative already refers to improving bridleways, supporting the upgrade of FP2 to a multi-user route and the creation of a circular perimeter link that reconnects to Byway 1. This would provide off-road access for walkers, cyclists and equestrians, strengthen settlement edge resilience by acting as a fire-break corridor, and ensure the proposed recreational green space is fully integrated into a continuous, legible movement loop.	Comment	The Council notes the significant volume of representations received in relation to Policy SAH4 and the concerns raised, including those relating to the scale of development, traffic and highway capacity, infrastructure provision (including healthcare, education and utilities), environmental impacts, and the suitability of the site in relation to the character of Brightlingsea. Following careful consideration of all representations made at the Preferred Options (Regulation 18) stage, alongside further technical assessment and review of the evidence base, the Council has decided to remove Site Allocation SAH4 (Land East of Church Road, Brightlingsea) from the Local Plan. This decision reflects concerns raised regarding the scale of development proposed and its potential to place pressure on local infrastructure, including the constrained highway network—particularly the reliance on a single primary access route—and the capacity of local services. The Council has also had regard to concerns about impacts on the character of the town, its setting, and environmental constraints. In place of SAH4, the Council is proposing a revised strategy for Brightlingsea which focuses on a number of smaller, more proportionate sites located within the urban area. This approach reduces the overall level of growth in Brightlingsea from approximately 325 dwellings to around 175 dwellings and provides a more dispersed pattern of development. The revised strategy is intended to better align with the town's characteristics, constraints and infrastructure capacity. The Council considers that this reduced and more distributed approach will help to alleviate potential impacts on highways, community infrastructure and services, and respond positively to concerns raised by the local community, whilst still contributing towards meeting the District's housing needs.
1654	13512	Natural England (Jonathan Burt) [1654]	Natural England advice is that this site will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites and will require a minimum of 5.76ha of SANG. However, please note that, in order to provide a 2.3km circular walk that meets NE SANG Guidelines, the minimum viable SANG size is 9-10ha for a densely wooded SANG, and 12-15ha with open habitats such as grassland and SuDS ponds.	Comment	
823	13573	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. "f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are	Comment	

			present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network."		
826	14500	Essex Wildlife Trust (Annie Gordon) [826]	Brightlingsea is located on the Colne Estuary, immediately adjacent to the Colne Estuary SPA, SAC and Ramsar site. SAH4 is a greenfield allocation on the edge of the town and has been screened at Category B in the HRA for LSE on the Colne Estuary SPA through disturbance and functionally linked land impacts. We note that the allocation policy for SAH4 includes a 20% BNG requirement and LNRS alignment, but — unlike SAH3 and SAH9 — does not include specific requirements for wintering bird surveys. Given that SAH4 is in an equivalent position to SAH3 in terms of proximity to a Habitats site, we consider this inconsistency to be an error that should be corrected. Wintering bird surveys and pre-commencement SPA bird habitat creation requirements should be included in the SAH4 policy.	Comment	
Businesses, Landowners and Developers					
705	4104	Mr Peter Le Grys [705]	This is an illogical suggestion given its remoteness from the town centre. It would appear as a random extension to the town with no landscape or transport sustainable credentials, appearing as an ill-thought out 'carbuncle' on the side of the town with no relevance or connection with the community.	Object	The Council notes the significant volume of representations received in relation to Policy SAH4 and the concerns raised, including those relating to the scale of development, traffic and highway capacity, infrastructure provision (including healthcare, education and utilities), environmental impacts, and the suitability of the site in relation to the character of Brightlingsea. Following careful consideration of all representations made at the Preferred Options (Regulation 18) stage, alongside further technical assessment and review of the evidence base, the Council has decided to remove Site Allocation SAH4 (Land East of Church Road, Brightlingsea) from the Local Plan. This decision reflects concerns raised regarding the scale of development proposed and its potential to place pressure on local infrastructure, including the constrained highway network—particularly the reliance on a single primary access route—and the capacity of local services. The Council has also had regard to concerns about impacts on the character of the town, its setting, and environmental constraints. In place of SAH4, the Council is proposing a revised strategy for Brightlingsea which focuses on a number of smaller, more proportionate sites located within the urban area. This approach reduces the overall level of growth in Brightlingsea from approximately 325 dwellings to around 175 dwellings and provides a more dispersed pattern of development. The revised strategy is intended to better align with the town's characteristics, constraints and infrastructure capacity. The Council considers that this reduced and more distributed approach will help to alleviate potential impacts on highways, community infrastructure and services, and respond positively to concerns raised by
705	4193	Mr Peter Le Grys [705]	See representation (post call for sites) made regarding potential of land to north of Stoney Acres, Robinson Road, Brightlingsea for residential development. Site preferable in terms of location and impact on wider locality than other greenfield options suggested.	Comment	
774	13714	Trinity College [774]	Land East of Church Road, Brightlingsea (hereafter referred to as 'the Site') was submitted through the Tendring District Council Call for Sites process in 2025 and has since been allocated for the development of up to 300 dwellings in the Preferred Options draft Local Plan under Policy SAH4. The College strongly supports this proposed allocation. It has commissioned a range of technical assessment work to demonstrate its deliverability and prepared a Vision Document to illustrate how it could come forward inline with the requirements of policy SAH4.	Support	
1659	14280	Colne Medical Centre (Louise Weston, Assistant Practice Manager) [1659]	We write on behalf of Colne Medical Centre and our Patient participation Group (PPG), to formally object to the planning application SAH4 for the proposed development of 300 new homes in Brightlingsea. We are the sole GP provider serving the communities of Brightlingsea, Thorrington, and Alresford,	Object	
1530	14302	Berrys (Lauren May, Senior Planning	We believe that land east of Church Road, Brightlingsea should be removed as a housing allocation within the emerging Local Plan. It is our view that the large allocation for 300 houses would have a significant impact on the recently extended Conservation Area at	Object	

		Consultant) [1530]	Brightlingsea Hall and All Saints Church. The proposed allocation would also not provide a natural extension to the settlement as it does not immediately adjoin the built up area of the settlement. Its inclusion within the Local Plan would result in an isolated development which does not fully emerge itself with the wider settlement.		the local community, whilst still contributing towards meeting the District's housing needs.
705	14328	Mr Peter Le Grys [705]	My comments on the Call for Sites submission for land north of Robinson Road, Brightlingsea, support its consideration for a modest development. The site is available, forms a single planning unit, and benefits from suitable access capable of serving a small number of dwellings. It is located adjacent to the existing settlement boundary in a sustainable location, with no identified physical, infrastructure, or heritage constraints. The land can be brought forward promptly and would represent a logical and proportionate extension to the town.	Comment	
774	14410	Trinity College [774]	We support Strategic Policy SAH4, which allocates Land East of Church Road, Brightlingsea for residential development. The evidence base accompanying the draft Local Plan robustly justifies this allocation, demonstrating that the site is both suitable and deliverable, and that it makes an essential contribution to the Council's requirement to identify new sustainable locations for growth over the plan period. Further evidence commissioned by Trinity College Cambridge reaffirms this position. A conceptual masterplan is presented in the Vision Document to illustrate how the site could be developed in a way that responds to the opportunities and constraints of the site to provide a positive addition to Brightlingsea. We draw further from this in our comments on matters of detail below. See attached docs for further details.	Comment	
Community Representatives					
953	3544	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	The Council notes the significant volume of representations received in relation to Policy SAH4 and the concerns raised, including those relating to the scale of development, traffic and highway capacity, infrastructure provision (including healthcare, education and utilities), environmental impacts, and the suitability of the site in relation to the character of Brightlingsea. Following careful consideration of all representations made at the Preferred Options (Regulation 18) stage, alongside further technical assessment and review of the evidence base, the Council has decided to remove Site Allocation SAH4 (Land East of Church Road, Brightlingsea) from the Local Plan. This decision reflects concerns raised regarding the scale of development proposed and its potential to place pressure on local infrastructure, including the constrained highway network—particularly the reliance on a single primary access route—and the capacity of local
1712	14234	Bernard Jenkin [1712]	Villages Small villages and towns with constrained access, such as Brightlingsea, will be disproportionately affected by the scale of proposed development. The proposed allocation of over 300 homes to Brightlingsea represents a 10% increase of housing, placing additional pressure on an already limited road network. Brightlingsea is served by a single road, the Hertfordshire B1029, which is regularly subject to disruption from maintenance works or accidents. The Local Plan Preferred Options Consultation Document does acknowledge the need for capacity/ safety enhancements 'where necessary' but does not set out any strategic road upgrades to support this level of housing growth. Brightlingsea has a limited sewerage network capacity with	Comment	

			sensitivities to storm overflows into the river. Anglian Water have disclosed that while Brightlingsea's water recycling centre currently has some spare capacity, the local sewer network is under pressure and could be adversely affected by new developments, stressing that developers must engage to ensure careful management and infrastructure upgrades to accommodate growth to not exceed sewer capacity[12]		services. The Council has also had regard to concerns about impacts on the character of the town, its setting, and environmental constraints. In place of SAH4, the Council is proposing a revised strategy for Brightlingsea which focuses on a number of smaller, more proportionate sites located within the urban area. This approach reduces the overall level of growth in Brightlingsea from approximately 325 dwellings to around 175 dwellings and provides a more dispersed pattern of development. The revised strategy is intended to better align with the town's characteristics, constraints and infrastructure capacity. The Council considers that this reduced and more distributed approach will help to alleviate potential impacts on highways, community infrastructure and services, and respond positively to concerns raised by the local community, whilst still contributing towards meeting the District's housing needs.
645	14274	Co-op Women's Guild (Joyce House) [645]	Infrastructure - lack of it. Roads unable to cope Lack of schools, doctors, dentist Samsons Road Brightlingsea It takes nearly 1 hour to get out of Brightlingsea each morning, to put 300 more houses on the edge of our town is wrong. The area floods, environment needs to be checked, there are badgers, birds, and bats on site. Smaller developments in town are much more reasonable. Wat about the empty site on Manor Estate? Lack of infrastructure - I would think the Council has a legal duty to provide infrastructure and support. Not this amount of houses, its wrong!!	Object	
1175	14431	ONTRACK Tendring Transport Users (John Smock) [1175]	The problem at Brightlingsea is that there is no railway and only one access road so that any disruption on that road can cause serious problems. Reinstating the railway on it's original route is unsatisfactory due to potential flooding from the River Colne so that if that were to be considered a new alignment would be necessary, probably a branch off the Clacton/Walton line near Alresford and which would also serve Thorrington.	Comment	
1705	14432	Residents of Springfields, Brightlingsea (A Resident) [1705]	Petition submitted	Object	
246	13447	Brightlingsea Town Council (Tracey Pulford, Town clerk) [246]	Brightlingsea Town Council formally objects to the proposed allocation of 325 additional homes - 300 of them on the SAH4 site - as set out in the Tendring District Local Plan Review 2025-2042. The Council highlights overwhelming concerns raised by residents, neighbouring councils and councillors, centred on severe traffic constraints caused by the town's single access road (the B1029), existing congestion, limited network resilience, and the cumulative impact of other approved developments and quarry HGV movements. The Council believes that the Local Plan's evidence base lacks site-specific transport assessments and that significant	Object	

			further technical work is required to properly evaluate traffic, infrastructure capacity, active travel limitations, environmental risks, and emergency access issues. While not opposing all development, the Council urges withdrawal of the SAH4 allocation, calling instead for smaller, more integrated sites within the town boundary that offer better connectivity and sustainability.		
Members of the Public					
1360	4194	Mrs Barbara Brett [1360]	Re:- proposed development SAH4 Samsons Road - Brightlingsea Development of the proposed site would further erode the available hunting ground for bird species such as owls Red kites and buzzards The town of Brightlingsea is served by a notorious, one road in and out, leading to heavy traffic and stand still traffic when maintenance works in operation. Any minor incident on the road can easily prevent access for emergency vehicles which could result in unnecessary lose of life.	Object	The Council notes the significant volume of representations received in relation to Policy SAH4 and the concerns raised, including those relating to the scale of development, traffic and highway capacity, infrastructure provision (including healthcare, education and utilities), environmental impacts, and the suitability of the site in relation to the character of Brightlingsea. Following careful consideration of all representations made at the Preferred Options (Regulation 18) stage, alongside further technical assessment and review of the evidence base, the Council has decided to remove Site Allocation SAH4 (Land East of Church Road, Brightlingsea) from the Local Plan. This decision reflects concerns raised regarding the scale of development proposed and its potential to place pressure on local infrastructure, including the constrained highway network—particularly the reliance on a single primary access route—and the capacity of local services. The Council has also had regard to concerns about impacts on the character of the town, its setting, and environmental constraints. In place of SAH4, the Council is proposing a revised strategy for Brightlingsea which focuses on a number of smaller, more proportionate sites located within the urban area. This approach reduces the overall level of growth in Brightlingsea from approximately 325 dwellings to around 175 dwellings and provides a more dispersed pattern of development. The revised strategy is intended to better align with the town's characteristics, constraints and infrastructure capacity. The Council considers that this reduced and more distributed approach will help to alleviate potential impacts on highways, community infrastructure and services, and respond positively to concerns raised by the local community, whilst still contributing towards meeting the District's housing needs.
1047	3686	Mr Connor Morris [1047]	This entire project is entirely unnecessary- I've read that Tendring would have met their new homes target, so this isn't needed in any respect. On top of this, the area where these are being planned to be built just simply isn't up to having 300 new homes, families and everything associated with that; the roads are barely kept up to standard as it is, with frequent traffic in and out of Brightlingsea, and the doctors and schools are struggling with the numbers they currently have to deal with. Please drop these plans.	Object	
597	3451	Miss Stacy Willis [597]	We do not need more housing for people in our areas , Brightlingsea is being ruined It's bad enough already with one road in and one road out. We have no sports centre anymore , dentists are at capacity and Doctors are too. The primary school is at bursting point , and I am glad I am not a student there now with approximately 750 students this is terrible. We need a one child policy or a no children policy for a few years to get the population down so we can preserve our wildlife and open space.	Object	
965	3457	Miss Erin Rose Puttock [965]	Brightlingsea is a town that is already stretched beyond its limits with regards to infrastructure and local facilities - what makes the town an appealing location will be diminished with building of even more houses. From the traffic going into/out of town; difficulties accessing the GP surgery; full NHS dental practices; school places; a pharmacy that barely keeps up with the demand - Brightlingsea is simply not able to effectively accommodate further population/housing growth. Having grown up in this town, and Grandparents and parents who also grew up here, we have all observed the negative changes over the years.	Object	
663	3560	Caroline Macgregor [663]	* Inadequate road access . Road blocked two hours on 11th February 2026 resulting in significant disruption and impact . People could die if air ambulance and emergency services unable to access town * Loss of green space	Object	

			* inadequate water supply * inadequate schools capacity * No GP service capacity * No local health service capacity in mental health, hospital beds , maternity services , Health visiting or school nursing .etc * Waste disposal capacity * Inadequate dentist capacity * approved building work of leisure /residential park has not yet been constructed and impact nseen * Inadequate pharmacy services		
744	3561	Paula Bradshaw [744]	The proposed development of 300 additional homes off of Sampsons Road will cause more congestion on our single road in and out of town. This road is not well maintained and any time work is carried out the town is grid locked which is dangerous as emergency vehicles can not enter or leave in a timely manner. The infrastructure of the town is already over capacity so unless there is a plan to also provide additional health care services, education places, policing, etc then this proposal is impractical and will impact on the current residents in a negative way.	Object	
976	3587	Ms Marianna White [976]	The proposal to build more houses in an already stretched Brightlingsea is ridiculous for so many reasons. Access to Brightlingsea is via one road which is already at capacity and suffering from heavy traffic use/damage to the road surface. More traffic will lead to delays, accidents, stress for residents access to the town. Access to the one Dr Surgery, the one Pharmacist, School, Dentist, Optician, employment is already over capacity. This all needs to be taken into account and affects lots of areas of the plan - Sustainabilty, health and wellbeing etc. Also, the impact on the wildlife!	Object	
978	3592	Mr Jason Sainty [978]	Brightlingsea and it's schools, doctors, dentists, sewers and chemist are at capacity. The B1029 cannot reliably take more traffic. There are NO funded council leisure facilities in Brightlingsea. I object to the SAH4 plan.	Object	
979	3593	Mr David Cook [979]	It will be expensive to connect this development to existing waste water treatment infrastructure in Brightlingsea. Without additional waste water treatment there is a risk of polluting the beach, which is an important leisure facility. The current Road out of Brightlingsea is often blocked due to accidents, Road works or the volume of traffic. This means emergency services can be delayed when responding. To make Brightlingsea viable for development a new road is required.	Object	

			More affordable housing is required.		
992	3638	Mrs Nicola Hale [992]	I object to the proposed 300-home development at Samsons Road SAH4 in Brightlingsea. The town relies on a single main access road, already heavily congested, in poor condition, includes bends and a steep hill that make it hazardous. Peak-time queues are already common, and this scale of development would significantly increase traffic, worsening safety risks and delaying emergency access. Local services such as GP provision, schools and other infrastructure are already stretched and there is no clear evidence they can support such a large population increase. For these reasons I believe the site is unsuitable for development of this scale.	Object	
1032	3656	Ms Jacquie Wilkes [1032]	While I support the need for a range of diverse housing, more consideration needed on where this should be. brightlingsea does not have the infrastructure structure to support further development. Health services are over stretched and congestion into and out of town an increased problem.	Comment	
1037	3667	Ms Elizabeth Norton [1037]	Given that access to Brightlingsea is on a single road to Thorrington Cross, the proposal for a further 300 homes in the town will lead to further congestion and delays accessing and leaving the town at peak times, especially as the town is the location for the areas only secondary school. Access for emergency vehicles is limited to the same single public road. Further, there are only limited medical facilities in the town. A small Drs surgery, no sports centre.	Object	
1038	3669	Ms Caryl Lynzy [1038]	300 new houses in Brightlingsea is way too many. Improve infrastructure first!	Object	
1038	3670	Ms Caryl Lynzy [1038]	Brightlingsea cannot accommodate as many as 300 new houses. The infrastructure needs to be assessed and improved before any such development can passed. Very local knowledge is needed here and evidence that TDC have researched fully into the needs of the whole town. Please do not agree to so many houses being built in Brightlingsea.	Object	
555	3676	Miss Sarah Beadles [555]	I live in a unique place it may be stuck in 1950s but Brightlingsea only has one road in and out one Drs and one chemist if we had another Drs and Chemist also two more schools Primary and Secondary then i think i would be in agreement . Why do not planning department think of the inferstructor first ? Im a practical and common sense person and we do need houses .But correct the inferstuctor first please.	Object	
1041	3677	Mary Carter [1041]	The development would increase traffic substantially on the one road in and out of Brightlingsea. The roads are already in a poor condition and this development would make them worse. Existing doctor and dental facilities would be stretched beyond capacity leading to the detriment of these services. Public transport is limited with no train services in Brightlingsea. I have just moved here and part of the reason is the uniqueness of Brightlingsea as it is now and this expansion would change that for the worse.	Object	

1045	3681	Miss Sadie Davenport [1045]	Not enough infrastructure to accommodate 300 houses	Object	
1047	3683	Mr Connor Morris [1047]	There is no need to add any more housing in Brightlingsea; there are other projects you've got approval on, that haven't been built yet - focus on those. Furthermore, 300 more houses will put too much strain on Brightlingsea's already struggling infrastructure.	Object	
1081	3769	Mr Geoffrey Parks [1081]	I wish to object to the construction of 300 homes on this site (SAH4) see attached file Local Plan TDC objection to SAH 4 revised.doc	Object	
1082	3773	Mr Andy McGrath [1082]	I do object to the planned development as: 1. Brightlingsea only has one access road and already in the rush hour the existing road is insufficient for the level of traffic 2.The schools do not have enough places for the current residents of Brightlingsea without further increasing the demand 3. The medical centre struggles to cope with the current residents without additions and that's true of dentistry also 4. The chemist provision is inadequate for Brightlingsea without increasing the demand.	Object	
1093	3781	Mrs Sheena Parks [1093]	I wish to object to this project due to the lack of Infrastructure being proposed. (See my detailed submission attached)	Object	
1096	3782	Mrs Yvonne Pye [1096]	I feel strongly that this development should not go ahead due to the lack of suitable infrastructure (see the file attached)	Object	
1119	3804	Mr BERNARD WILD [1119]	at least 2 roads for adequate access. Brightlingsea is extremely vulnerable having only one road into town and any holdups,accidents, road repairs etc put the whole town at risk. I travel each day and face long delays to Thorrington and I also worry about Emergency Services needing quick access when required. If as suggested that traffic comes onto Samsons Road, traffic will soon snarl up in trying get onto Church Road to leave. It isn't suitable now and further development will bring tremendous pressure to provide a service that is already failing the existing people of this town.	Object	
1148	3861	Mr David Green [1148]	The proposed numbers of houses in Brightlingsea cannot be supported in a town that has had little or no improvement in infrastructure that will enable such a large influx of residents to benefit the town and to have a good lifestyle themselves.	Object	
1043	3968	Mr Stephen House [1043]	One road access not fit for purpose now, construction traffic will further deteriorate it's condition as the current SRC works are already doing. If the homes are built the additional traffic will cause further damage which despite regular patching is in a very bad state, the road	Object	

			works alone cause chaos when the totally ineffective patching takes place and when it has to be repeated again.....and again.....and again etc. The queuing at Thorrington Cross roundabouts at peak times is unbelievable often a mile long, this wont improve. Access to the town for emergency vehicles is a major concern to us.		
1043	3969	Mr Stephen House [1043]	Insufficient infrastructure	Object	
1347	4000	Mrs Alison Hogg [1347]	I am a resident of many years [redacted]. With an average population of 2 to 3 adults per abode these 300 proposed houses would equate to 1000 additional people and vehicles. Brightlingsea only has services of 1 NHS Doctors/Dentist, 1 firestation, 1 primary/secondary school, 1 supermarket, 1 post office, no banks, no nursery, limited hourly bus service, and only 1 road into the town. The public services for waste collections and telecommunication/water/gas/electric supplies are also extremely stretched already. Disappointingly I haven't received any direct communication regarding the plans. Very concerned this will damage Brightlingsea.	Object	
1345	4001	Mr Chris Rushton [1345]	Current resident living very close by the semi rural setting for health and wellbeing reasons. 300 houses would equal approximately 1000 additional residents with the average household having two vehicles that's approx 600 more vehicles moving around the area, commuting in and out of an already stretched single road into and out of the town. More traffic would slow the access for emergency services into the town. Not to mention the extra strain it would put on the existing facilities already at breaking point , 1 post office, no banks, doctors, dentists, fire service and surrounding limited infrastructure, And amenities.	Object	
581	4160	Mrs Sally Webb [581]	Road infrastructure not able to cope. One way in and one way out of Brightlingsea and farm land again given over to housing. No.	Object	
1359	4182	Mr Elizabeth Arnold [1359]	There is only one road into and out of Brightlingsea. Already the queue to get out of Brightlingsea in the morning can be back to All Saints church on a normal morning. If 300 houses are built, as shown in the plan, this is likely to attract families. They will need to get out of Brightlingsea for work. 16 - 18 year olds will also need to travel to study. It is totally unrealistic to believe that all of the people coming into this development will be able to travel by public transport to get to work or college.	Object	

749	4199	Frances Morton [749]	I am concerned about the effect more housing will have on our infrastructure. We have one road into and out of town, one pharmacy, one medical practice and one high school. All of these are full to capacity. [redacted] I know that the service will suffer enormous pressure if forced to take on more patients. My understanding is that if we accepted the original proposed new housing we would have met our targets in Brightlingsea. The proposed additional 300 houses under SAH4 is extra and unnecessary.	Comment	
749	4200	Frances Morton [749]	The proposed additional housing in Brightlingsea will place a huge pressure on local infrastructure. As part of the Patient Group at the Medical Centre I am aware of the lack of consultation with the staff there and how concerned they are about the possible additional patients. Our roads, schools and pharmacy will have added pressure and it can only have a detrimental effect on the town and the residents.	Comment	
1389	4248	Miss Gretta Totenhofer [1389]	Brightlingsea has one road in and out which is already at capacity. The doctors surgery and pharmacy are at capacity and can not cope with an increase in patients which will happen if more houses are built.	Object	
1388	4250	Mr Stanley Wong [1388]	Brightlingsea do NOT have enough resource for more houses, one way in and out are ready create traffic jam every morning! Most of the residents do NOT have dentist in Brightlingsea. Doctor waiting time is far too long, never happen before all the new developments. Shut down the Brightlingsea Sport Centre to "Save" money but Tendring council have enough money for Clacton leisure centre!	Object	
695	4272	Mr Stephen Wicks [695]	I am opposed to the proposed addition of 300 homes in Brightlingsea (ref SAH4) on the grounds that our unique town and community would be damaged through this unnecessary development. Road access in and out of town can already be problematic and will be under significant extra pressure both during the development stage with cinstruction vehicles and after building with hundreds of additional cars. Our potholed roads will deteriorate. Access to school, GP, and dentistry places which are already under pressure will become worse. Our small town's identity and community spirit will be damaged by any development of this scale.	Object	
1214	4321	Mr John Beasley [1214]	My objection to SAH4 for 300 homes north of Samsons Road, Brightlingsea, is based on the town having only one access road (B1029), already heavily congested. At peak times, journeys to Thorrington Cross can take up to 15 minutes, with queues stretching over a mile. TDC’s own study found the B1029/B1027 junction at capacity, and further housing, alongside other approved developments, will worsen congestion and environmental impacts. Recent roadworks showed how quickly delays escalate, potentially affecting emergency response times. Any junction improvements are unlikely to resolve cumulative impacts, as similar concerns led to refusal of a 2004 housing proposal.	Object	
1400	4343	Joan Bryant [1400]	Road access, Thorrington Cross Bottleneck	Object	

			Inadequate health and care provision	
1465	4482	Ms Kate Connolly [1465]	I wish to object to housing supply ref SAH4 - Brightlingsea cannot support this number of houses with the potential of 600 - 1000 additional people/ cars. Our one road into the town is crumbling and in urgent need of repair. Our doctors, dentists, and pharmacy are oversubscribed as are our schools. At peak school run times, the traffic going out of town can run all the way back to All Saints Church and if there are badly timed roadworks the wait can be even longer.	Object
1081	13180	Mr Geoffrey Parks [1081]	Object to the construction of 300 homes on site SAH4	Comment
1081	13181	Mr Geoffrey Parks [1081]	I object to the construction of 300 homes on site SAH4.	Object
1522	13423	Lorraine Burch [1522]	TRAFFIC IMPACT The road in & out of Brightlingsea is not fit for purpose!!! AMENITIES The GP surgery is on its knees!!!!! Full to capacity!!! Brightlingsea schools are full to capacity!!! Boots pharmacy is struggling to provide its customers with the high demand of prescriptions given in on a daily basis!!!! Water supply & waste water is not adequate to cope with increasing demand!!!! Flood Risk!!!!! PARKING The town is gridlocked with cars, there is literally no where to park!!!WILDLIFE With past developments we have seen the detrimental impact it has on our wildlife!!!! Hedgerows ripped down, trees cut down etc	Object
1140	13429	Michelle Scofield [1140]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. Local services and infrastructure are already operating beyond capacity. Brightlingsea currently has only one GP surgery, one pharmacy and very limited dental provision, all of which are widely reported to be unable to meet existing demand. Brightlingsea is also not well served by sustainable transport. The railway closed in the 1960s and residents must travel to Colchester to access rail services including the line to London Liverpool Street. As a result, the town is heavily dependent on private vehicles. Policy SAH4 therefore appears inconsistent with the principles set out in the National Planning Policy Framework, which requires development to be supported by adequate infrastructure and located in sustainable locations. The proposal does not provide clear evidence that the necessary transport, healthcare, education or emergency service infrastructure can be delivered to support this level of growth. For these reasons, the allocation of approximately 300 dwellings in Brightlingsea under Policy SAH4 is considered unsustainable and unjustified.	Object
1504	13705	Ning Lee [1504]	The volume of housing proposed at the SAH4 site is inappropriate for the area, given local infrastructure issues, traffic volumes, congestion and quality of life. Thorrington Cross is at 219% capacity already, there is no infrastructure plan for the junction, and sustainable travel is	Object

			limited due to a lack of safe paths. Additionally, there could be pressures on the GP surgery and other services from local developments, such as Hare Green Garden Village, the proposed homes in Alresford, and proposed homes in Thorrington. SAH4 is not in a sustainable location and contradicts the Plan's own rules.		
1472	13723	Mary Girling [1472]	The rural countryside has gradually been eroded, and the proposed plans to increase the number of houses by yet another three or four hundred dwellings seems excessive. Wait times for the chemist and GP are very long, and the access road into Brightlingsea is barely able to cope Various large building projects in the area seem to be at a standstill, with the market and money for new houses not generating sufficient funds to actually complete the projects. In a nutshell, Brightlingsea is quite large enough already. I am opposed to any further developments as this will inevitably be detrimental to the quality of life in the parish.	Object	
1514	13731	Sarah Lee [1514]	The volume of housing proposed at the SAH4 site is inappropriate for the area, given local infrastructure issues, traffic volumes, congestion and quality of life. Thorrington Cross is at 219% capacity already, there is no infrastructure plan for the junction, and sustainable travel is limited due to a lack of safe paths. Additionally, there could be pressures on the GP surgery and other services from local developments, such as Hare Green Garden Village, the proposed homes in Alresford, and proposed homes in Thorrington. SAH4 is not in a sustainable location and contradicts the Plan's own rules.	Object	
1137	13744	Mrs Mary Nixon [1137]	I am registering my objection to the proposed addition of 325 homes in Brightlingsea. The local plan to build this number of new homes does not take proper account of the existing & cumulative effect of traffic congestion arising from the local highway network & the previously approved developments in Robinson Road, Holiday Village Scheme & expansion of Marina apartments. These developments along with an additional 325 homes would overload the existing single access route into & out of Brightlingsea. There is poor public transport provision & therefore a greater reliance on vehicles for journeys in & out of the town which will increase with this development. Any disruption on this road already results in severe delays & long queues. This will only get worse if approval is given for these homes & the additional construction traffic will also exacerbate these problems. There will also be increased safety issues for residents & visitors as a result of these increases in traffic. In addition to the traffic issues there is the fact that Brightlingsea does not have the infrastructure to deal with the increase in homes proposed. The current doctor's surgery, schools, green spaces &	Object	

			services are already under pressure with no flexibility to increase in size to accommodate the additional numbers of people, young & adult, created by building 325 new homes.		
1618	13748	James Willis [1618]	I am writing to formally object to the proposed development of 300 new homes in Brightlingsea, Essex. I have been a resident of Brightlingsea for nearly four years and have experienced first- hand the limitations of the town's infrastructure and local services. I strongly believe that this development would place an unsustainable burden on an already overstretched community Firstly, Brightlingsea is served by a single main access road in and out of the town. This road is already heavily congested during peak hours, with regular gridlock causing significant delays for residents on a daily basis. The addition of hundreds of new households would inevitably increase traffic volume, exacerbating existing congestion issues and negatively impacting quality of life, emergency access, and local air quality. Secondly, access to essential healthcare services is already insufficient. Despite living in the town for several years, I have been unable to register with a local dentist due to widespread oversubscription. This clearly demonstrates that current provision does not meet existing demand, let alone the needs of an expanded population. Furthermore, Brightlingsea is served by only one GP surgery, which already covers a large geographical area. It is evident that this facility is operating at or near capacity, and any further increase in population would place additional strain on services that are already struggling to cope. This raises serious concerns about residents' ability to access timely and adequate medical care. In light of these issues-namely inadequate transport infrastructure and insufficient healthcare provision-I respectfully urge the council to reconsider this proposal. Without significant and demonstrable improvements to local infrastructure and services, this development would be detrimental to both existing residents and future occupants. Thank you for taking the time to consider my objections.	Object	
1264	13749	Jane South [1264]	Further housing development in Brightlingsea risks being out of scale with the town’s small coastal character, leading to overcrowding and loss of identity. Existing infrastructure—roads, schools, healthcare, sewerage, and public transport—is already at capacity, with only one access road in and out of the town. Increased development would worsen traffic, road damage, and pressure on limited bus services, particularly for students. Coastal flood risk, carbon impact, and environmental vulnerability are significant concerns. The proposals also risk undermining local businesses, community facilities, and overall quality of life, and should not proceed.	Object	

1517	13757	David Chivers [1517]	I wish to object to the proposed development of 300 homes in Samsons Road, Brightlingsea (SAH4), because of the increase in traffic on the one and only entry/exit road and the lack of increase in local amenities to support such a large increase in the population of the town.	Object	
1525	13766	Mat Court [1525]	Objection to SAH4 in Brightlingsea on the grounds of suitability, infrastructure capacity and deliverability, rather than opposition to housing in principle. SAH4 is not required to meet housing targets, as these are already exceeded without it. Brightlingsea is a single-access settlement reliant on the B1029 and Thorrington Cross, which already operates over capacity with no funded mitigation identified. The site would increase car dependency due to limited public transport and distance from services, with cumulative impacts from nearby developments further worsening congestion. The allocation is therefore unjustified and undeliverable.	Object	
1287	13775	Jeff Gill [1287]	Although Tendring have produced an extensive plan of what needs reviewing there is a distinct lack of what order these would be carried out and what items would take priority. The only definite proposal is for the possible development of 300 homes in North Brighlingsea. This is all fine but what proposals are there to ensure the infrastructure will be put into place prior to this development. Examples of issues would be access to the main road from this site without adding to daily traffic. It currently can take up to 20 minutes to do a mile journey to get out of town. Development of the water front flat are a classic example where inadequate parking facilities where provided for causing residents to to take up valuable parking spaces on the water front. Please ensure the infrastructure takes some priority prior to any new development.	Comment	
1623	13783	Carl Parkin [1623]	When are Tendring District Council going to realise that the infrastructure in Brightlingsea is already stretched to breaking point, with lack of doctors, dentists, schools etc? The only road in and out is in a constant state of disrepair, trying to handle volumes of traffic it was never designed for. At peak hours the congestion stretches back to the bottom of Church Hill. When the (mostly ineffective) repairs are carried out the town is brought to a complete standstill, with traffic stationary from beyond Thorrington back into Brightlingsea itself. In this situation emergency vehicle access seems to have been completley ignored, a major concern among residents, many elderly. Tendring is a largely open space, served very well by a network of roads linking directly to major routes, such as the A12 and A120. It seems dangerously ludicrous to constantly overdevelop a town down a dead end road with insufficient access or facilities.	Comment	
1180	13791	Mrs Deicha Bowman [1180]	I object to the proposed development of SAH4 land east of Church Road, Brightlingsea, primarily due to traffic impacts. The town has one road in and out, already prone to congestion, and any blockage effectively cuts the town off. Additional housing would significantly increase traffic, including heavy goods vehicles, worsening existing issues with potholes, drains and mud. Pedestrian and cycling infrastructure is inadequate, and bus services are unreliable. Local services, including the single GP surgery, pharmacy, and schools, are	Object	

			already under strain. There are also concerns that water supply and sewage systems cannot cope with the scale of development proposed.		
556	13798	Christine Cook [556]	The volume of housing proposed at the SAH4 site is inappropriate for the area, given local infrastructure issues, traffic volumes, congestion and quality of life. Thorrington Cross is at 219% capacity already, there is no infrastructure plan for the junction, and sustainable travel is limited due to a lack of safe paths. Additionally, there could be pressures on the GP surgery and other services from local developments, such as Hare Green Garden Village, the proposed homes in Alresford, and proposed homes in Thorrington. SAH4 is not in a sustainable location and contradicts the Plan's own rules.	Object	
755	13800	Joss Wiggins [755]	I am writing to object to the plan to build 300 new houses on land in Brightlingsea. I am of the opinion that to build more houses in Brightlingsea at the current time would be completely wrong considering our infrastructure is already over-stretched. 1. The only road in and out is already very busy with long queues at peak times, when there are road works or an accident it can be at a standstill for hours with very long queues to get in/out of town. This prevents emergency services from attending incidents. This road is in a very bad state of repair with numerous pot holes due to the sheer volume and heavy traffic using it. 300 new houses would bring at least 300 extra cars, meaning even more congestion and damage to the road. 2. The doctors' surgery is already overstretched, as is the only pharmacy in town. 13. With 300 new houses it would be expected that many families will have children of school age. The town's primary school would definitely struggle to accommodate such a large influx of children. 4. I understand that the water/waste system is already at full capacity, if not overstretched. 5. The public transport operating within the area at the moment is poor. For these reasons I urge the council to reject the plan until such time as the much needed infrastructure is in place.	Object	
1141	13801	Carol Howard [1141]	I object to Policy SAH4 proposing approximately 300 additional dwellings in Brightlingsea due to severe infrastructure constraints. The town is served by a single B-road, already congested and lacking adequate footpaths, where any incident can effectively isolate the town and delay emergency services. The Local Plan does not demonstrate how the highway network or emergency access would cope with increased traffic. Local services, including the single GP surgery, pharmacy, and schools, are already at or beyond capacity, with no clear plan for expansion. Limited public transport and reliance on private vehicles further undermine sustainability. The proposal is not supported by	Object	

			adequate infrastructure and is therefore unsustainable and unjustified.		
1170	13825	Mrs Pauline Skerritt [1170]	I object to the 300 houses proposed in Brightlingsea under SAH4 due to the town's single access via the B1029, which is already heavily congested, with nearby junctions over capacity. The site's location near a dangerous bend raises further safety concerns, and road conditions are poor. Limited public transport and local employment mean increased reliance on cars. Infrastructure is already stretched, with GP services, dentistry, pharmacy provision and schools at or beyond capacity. There are also concerns regarding water supply and waste disposal. As the housing is not required to meet TDC's obligations, the proposal is unnecessary and should be removed from the Local Plan.	Object	
1630	13828	Jacqui Tavner [1630]	am writing to raise my concerns regarding the proposals for an additional 325 homes to be built in Brightlingsea. There are many reasons why this is such a bad option, which include Massive increase in traffic, with only 1 road in and out of Brightlingsea there is already considerable disruption in the event of road works, accidents and incidents, works to power lines, tree works, the list goes on, the disruption is immense and causes massive lengthy tailbacks, as much as a mile in each direction from the roundabout at Thorrington Cross. Police Ambulances and other emergency services struggle to get through causing distress frustration and huge disruption. GP Surgery, Schools, Pharmacy Dentist already bursting at the seams and struggling to cope with demand, causing distress and anxiety to local residents. Wildlife already being affected by increased development and traffic, in that particular area it is the habitat hares, otters, deer, badgers and S largel number of birds, live and thrive, we are proud that we have such a variety of beautiful creatures thriving in our community Brightlingsea is a caring sharing community and whilst we can accept some change has to happen these proposals are totally unrealistic. I do hope that further consideration will be given to them and that my comments will be read and registered.	Comment	
1302	13833	Max Henry [1302]	Please take this email as confirmation of my objection to the building of 300+ more homes in Brightlingsea. The towns charm is its countryside feel and the environmental good it does for wildlife in Essex. Taking this away will be extremely short sighted.	Object	
1296	13834	Tony Gray [1296]	Objection to the proposal due to serious and unresolved planning concerns. The development would add around 1,000 residents to an area already experiencing severe traffic congestion, with no credible infrastructure plan to mitigate impacts. Local healthcare is overstretched: Brightlingsea has one GP practice at capacity, no available NHS dental provision, and a single pharmacy facing long waits. Promised future facilities are uncertain and unrealistic. The loss of open land would harm the town's rural character. Overall, the proposal is unsustainable and would significantly reduce residents' quality of life.	Object	

1292	13836	Nicola Stephens [1292]	Objection to the Local Plan proposals for 300+ additional homes in Brightlingsea due to a clear lack of supporting infrastructure. The town has a single road access (B1029) that already experiences severe congestion, making further growth unsustainable and unsafe, including for emergency access. Schools, SEND provision, GP services and healthcare are already under significant pressure with no guaranteed funding, land or phasing solutions. Additional development would also increase harm to protected coastal wildlife and habitats. Without firm, funded and enforceable infrastructure commitments, the proposed scale of growth is unsustainable and should be reconsidered.	Object	
1236	13843	Suzanne Jordan [1236]	Objection to further housing development in Brightlingsea due to severe existing constraints. The town has a single road access, no rail station, and limited alternatives, resulting in extreme congestion, delays and missed appointments when accidents or roadworks occur. Local infrastructure is already overstretched, with just one GP surgery, pharmacy, dentist and school, and no bank or police presence. Additional housing would worsen access to essential services and increase car dependency. Development would also damage valued wildlife habitats. More suitable sites exist elsewhere; this poorly planned proposal should be dropped.	Object	
1628	13846	Wendy Richardson [1628]	The proposal for 300+ more homes to be built in Brightlingsea is totally ludicrous as the Town is already struggling with the amount of traffic coming in with only one access road in and out of the Town Plus the Doctors surgery can not cope with the amount of people already living here. It's near on impossible to get to see a Doctor when needed. We just do not have the infrastructure in place to cope with any more new housing building projects. Please note my husband and I are strongly against this proposal.	Object	
1223	13856	Janet Linton [1223]	I object to Policy SAH4 proposing approximately 300 dwellings in Brightlingsea due to severe infrastructure constraints. The town relies on a single B-road, already congested and easily blocked, risking isolation and delays to emergency services. The Local Plan does not show how the highway network will cope. Local services, including healthcare and schools, are already at or beyond capacity, with no clear provision for expansion. Limited public transport increases car dependency, conflicting with sustainable development principles. Without clear, deliverable infrastructure improvements, the proposal is unsustainable and would place unacceptable pressure on the town.	Object	
1286	13862	Thomas Storey [1286]	The 300 houses in Brightlingsea is a disgrace and should not happen! It's ruining our town! Please I beg you to not let this happen.	Object	
1450	13864	Caterina Cinel [1450]	I formally object to the proposed allocation of 325 homes at Site SAH4 (Land East of Church Road), as Brightlingsea has reached its practical infrastructure limits. Evidence shows severe highway impact, with Thorrington Cross already operating well beyond capacity and no identified funding or solution to address this. The site is an unsustainable location, lacking adequate transport alternatives and resulting in car dependency. The Local Plan fails to account for cumulative pressure on services, including healthcare and education.	Object	

			With excess housing already proposed above targets, the inclusion of SAH4 is unnecessary and conflicts with the Council's own strategic policies.		
1299	13900	Jayne Chapman [1299]	It goes aginst all the principles for sites, infrastructure extremely bad, road access extremely poor, one road in and out, often blocked. Now have to allow an extra 30 minutes to get out of Brightlingsea. Traffic numbers are exceeding the amount of movements predicted for Thorrington Cross causing untold congestion. Brightlingsea Road blocked cutting Brightlingsea off. 300 new homes equates to minimum of 600 new cars. 900 people, no Doctors appointments, no NHS Dentist, no school places, maternity homes refusing admissions and no where to Bury our residents. The site has been refused permission in the past and was dismissed on appeal siting reasons of extra traffic movements, light pollution, in a flood zone, environmental, ancient woodlands, Bats, curlews, newts and Badgers all on site. Retention of open space. In the appeal it states "the features would diminish the semi rural character, erode the well established boundary between the town and surrounding countryside and harm the setting of the town. It would splinter the town, to far to walk to support local High Street and businesses and nowhere to park if you drive in. We already have to factor in the Extra traffic movements from Robinson Road holiday development. 5 large houses and 36 retirement lodges and 104 units equating to 1000's of extra traffic movements.	Object	
1063	13903	Dr Marion Witton [1063]	I would like to object on a number of points: 1. The Council can more than reach its target with the extra homes in Brightlingsea - mandatory target 18,071 homes - proposed supply 19,517 homes - flexibility buffer 1,446 homes. 2. There is only one road in/out 3. There is no plan for increasing infrastructure that has to be put in place before any extra houses are built and there is no apparent funding allocated for expanding the infrastructure 4. There is no explanation of where the additional jobs will come from 5. Sustainable travel is unrealistic.	Object	
1103	13908	Mrs Sarah Levy [1103]	Objection to the proposed 300-home development at Samsons Road, Brightlingsea (SAH4), due to severe traffic impacts, limited infrastructure, and a lack of local amenities. Brightlingsea has only one access road, already congested, with knock-on impacts at the overstretched Thorrington Cross junction. Bus services are limited, there is no railway station, and employment opportunities are scarce, increasing reliance on car travel. The town lacks safe pedestrian and cycle links and local services are under strain. The development is not required to meet housing targets and is unsustainably located.	Object	
594	13912	Mr Paul Barrell [594]	SAH4 is unsuitable and conflicts with multiple NPPF requirements. There are viability issues including the steep slope, infrastructure costs and reduced capacity; poor access to schools and services;	Object	

			child-safety risks from nearby reservoirs; severe transport constraints; north-facing orientation; proximity to flood risk; and potential harm to the adjacent SSSI/MCZ. The site breaches several NPPF policies and should be removed from the plan, effectively proposing a change to site allocation policy.		
1199	13914	June Jagger [1199]	Lack of. Infrastructure. Environment. Roads.	Object	
1138	13916	Katie Coe [1138]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1621	13917	Colin Mallard South [1621]	I object to the proposal for 300+ new homes in Brightlingsea. The scale is unsuitable for a small coastal town and would overwhelm already-stretched infrastructure, including roads, schools, healthcare and sewerage. Our single access road is already congested, and limited public transport worsens this. Coastal and climate vulnerabilities raise further risks, while large developments threaten the town's character, economy and community identity. The site's edge-of-town location would not support High Street businesses, and younger residents lack adequate community facilities. Overall, further development would reduce quality of life and should not proceed.	Object	
1156	13918	Christine Browning [1156]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1289	13920	Mr & Mrs Neale [1289]	We along with most of the town think that this proposal is a very bad idea. We are already struggling with dentist, doctors, pharmacy,	Object	

			schools, and traffic problems in the town and getting out of it, not to mention water and sewerage problems. Building more houses here would have a dramatic impact on all that we love about Brightlingsea. We have already built more houses here in the last 5 years and have done our bit. Unfortunately most new builds here have been luxury houses with a small amount of affordable ones, so not helping the younger generation get on the housing ladder. We are definitely opposed to this site being used for more housing in our town, in our opinion it will lead to an over kill of housing without the required infrastructure to back it up.		
1605	13921	James Buck [1605]	TDC NEW HOUSING IN BRIGHTLING. THE STRAIN ON EXISTING INFRASTRUCTURE.	Object	
1634	13930	Jean Gordon [1634]	As a resident of B'sea since 1979 I have seen a lot of change and development. The amount of cars on our small roads, the loss of facilities, only one pharmacy for a town this size. Without thought being given to help local residents how can we support maybe 600 more inhabitants!	Object	
1291	13933	Michelle & Patrick Weatherley [1291]	Objection to the proposed 300?home development adjacent to All Saints Church (site SHA4) due to the cumulative pressures already placed on the town. Recent growth from infill and the Robinsons Road estates has increased strain on GP and pharmacy services and worsened congestion on the town's single access road. Further housing without supporting infrastructure is unsustainable, particularly given the lack of a railway and reliance on car travel. Serious concerns remain about site access, interaction with quarry traffic, and impacts on Brightlingsea's semi-rural character. Future development should be infrastructure-led and shaped by local community input, not focused solely on additional housing.	Comment	
1046	13934	Miss Katie Wellings [1046]	Objection to Policy SAH4, which proposes approximately 300 additional dwellings in Brightlingsea. The town is constrained by a single B-road access that already suffers from congestion, safety issues and limited emergency resilience. Local services, including the GP surgery, pharmacy, dental provision and secondary school, are operating at or beyond capacity. Brightlingsea is not sustainably located, with no railway and a heavy reliance on private cars. The Local Plan fails to demonstrate how transport, healthcare, education or emergency infrastructure would be delivered to support this growth. Without clear and deliverable infrastructure improvements, the proposal is unsustainable, unjustified and should be removed from the Local Plan.	Object	
1295	13935	Pauline Tanner [1295]	Hi I am emailing you with my concerns for the above proposal. I'm very concerned on the effects up to 60 plus more people will have on the infrastructure of the town. This was not addressed by your representatives at the town council meeting yesterday. We have one Drs surgery, 2 NHS dentists and one school are more going to be built to cope with the extra people? There is only one road in and out of brightlingsea, this road gets incredibly busy and what with pot holes etc it will struggle to cope. The proposed site also has various wildlife.	Comment	

1209	13937	Pamela Miller [1209]	Main point is infrastructure to support the building of 300 extra homes has not been costed for in your proposal. SAH4 does not need to be in the Local Plan (see over)	Object	
1202	13938	Diane Wakelin [1202]	ROAD ACCESS !!	Object	
1139	13939	Linda Salmon [1139]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1159	13941	Russell Richardson [1159]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1142	13944	Jacqueline Hall [1142]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	

1278	13953	Mr & Mrs Turner [1278]	I strongly object to the proposed 300 homes in Brightlingsea as it represents overdevelopment that would cause significant harm to infrastructure, residents, and the environment. Local services, including schools, GP surgeries and dental provision, are already overstretched, and the road network is congested and unsuitable for further traffic. Parking provision is insufficient, and the scale of development would worsen safety issues. The proposal would also result in irreversible loss of wildlife habitats. Overall, the development is unsustainable, conflicts with national planning policy, and cannot be adequately mitigated, and should therefore be rejected.	Object	
1507	13956	Jane Mellor [1507]	Objection to the proposed 300-home development at site SAH4 in Brightlingsea. Recent growth has already placed severe strain on infrastructure, including the town's single access road, which regularly suffers congestion, disrepair and gridlock, with no funded improvements identified. Public transport and cycling provision are inadequate, parking is already problematic, and reliance on cars would increase. Local GP, pharmacy and school provision are oversubscribed, and further approved developments will add pressure. The proposal conflicts with Local Plan policies on highway impact and infrastructure capacity. Given high levels of empty homes locally, the site appears driven by land availability rather than suitability and should not proceed.	Object	
762	13963	Pearl Wiggins [762]	I am writing to object to the plan to build 300 new houses on land in Brightlingsea. I am of the opinion that to build more houses in Brightlingsea at the current time would be completely wrong considering our current infrastructure is already over-stretched. 1. The only road in and out is already very busy with queues at peak times, when there are road works or an accident it can be at a standstill for hours with long queues to get in/out of town. Also this road is in a bad state of repair with many pot holes due to the sheer volume and heavy traffic using it. 300 new houses would probably bring at least 300 extra cars, meaning even more congestion and damage to the road. 2. The doctors' surgery is already overstretched, as is the only chemist in town. 3. With 300 new houses it would be expected that many families will have children of school age. The town's primary school would definitely struggle to accommodate a large influx of children. 4. I understand that the water/waste system is already at full capacity. 5. The public transport operating within the area at the moment is poor. For these reasons I urge the council to reject the plan until such time as the much needed infrastructure is in place.	Object	
1151	13980	Peter Browning [1151]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea.	Object	

			Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.		
1165	13982	Kelly Browning [1165]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1136	13983	Linda and Norman Lague [1136]	Lack of infrastructure, poor access along single road. See attached document - handwritten form	Object	
1224	13984	Sue Higgins [1224]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1196	13985	Doreen Louise Whybrow [1196]	See attached document - handwritten form Objection to SAH4 due to lack of infrastructure, one road in/out, impact of wildlife	Object	
1231	13986	Lin Chappell [1231]	Objection to SAH4 due to lack of infrastructure, one road in/out of town. See attached document - handwritten form	Object	

1166	13987	Roger Higgins [1166]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1145	13988	Reinhard Spiolek [1145]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1203	13989	Allan Wakelin [1203]	Objection to SAH4 due to the single access road in/out See attached document - handwritten form	Object	
1157	13990	Louise and Patrick Mulvihill [1157]	This development would increase the size of the town by approx 10%. this growth IS unnecessary, IS not sustainable and not supported by infrastructure.	Object	
1158	13992	Christine Williams [1158]	Objection - one road in/out, safety concerns.	Object	
1633	13993	Sylvia & Nicholas Gristock [1633]	We are writing to voice our concerns about the proposed plan to build more than 300+ new homes off Samsons Road in Brightlingsea. This proposal will put considerable strain on the town's infrastructure. The large number of additional residents will put further demands on the medical facilities currently in town and the school places available from infant through to secondary level. The inevitably large number of extra vehicles from this proposal will cause constant traffic problems both during construction and from the residents of the proposed new homes.	Comment	

			The effect of damage to the natural habitat for much of the established wildlife and plants will be immense and irreversible. We urge you to consider the impact these proposed new homes will have the residents of Brightlingsea, the town infrastructure and any further loss of natural habitat.		
665	13994	Mr John Hewerdine [665]	Objection to SAH4 - site is not feasible or sustainable. See attached document - handwritten form	Object	
1140	13995	Michelle Scofield [1140]	Objection to Policy SAH4, which proposes around 300 additional dwellings in Brightlingsea. The town is constrained by a single B?road access that already suffers congestion, limited footpaths, and vulnerability to disruption, posing risks to residents and emergency services. Local infrastructure is operating beyond capacity, with overstretched GP, pharmacy and dental provision, a full secondary school, and limited public services. Brightlingsea lacks sustainable transport options following the closure of the railway and is heavily car-dependent. The Local Plan fails to demonstrate how essential transport, healthcare and education infrastructure would be delivered. The proposal is therefore unsustainable, unjustified, and should be removed from the Local Plan.	Object	
1632	13996	Michael Kovac [1632]	I am against this amount of development in Brightlingsea as I cannot get a doctors appointment when I need one. it takes so long to get out of town the roads are blocked. No school places, dentists (I have to go to Colchester). Removal of open green spaces. Past Grade I Church.	Object	
1164	13997	Carole Haywood [1164]	Objection to SAH4 - concerns that the town cannot support development of this size, only the one road in/out and lack of Drs etc. See attached document - handwritten form	Object	
1204	13998	Michael Galvin [1204]	Objection to SAH4 Concerns about the one road in/out, Drs, schools. See attached document - handwritten form	Object	
1206	13999	J. Reilly [1206]	Approximately 10 years ago the people of Brightlingsea were informed by the council that due to the lack of local infrastructure in the town there would be no more building within the towns boundaries. Apparently the water system, sewage system, infant and junior schools, doctors surgery, and road system were no longer adequate for what was needed. Shortly after the government demanded more houses in the area, suddenly all our systems became quite miraculously, good enough for purpose, and Robinson road estate (an estate as big as Maltings and Seaview estate combined), was built . It would now seem that we can now fit in another estate of approx. 325 dwellings. Is this I ask myself all going to run off of our wonderful in adequate	Comment	

			infrastructer? I am not saying yea or nay to the scheme, all I am doing is inquiring in my own little way when will the elastic band that is holding Brightlingsea together finally snap? Visit the old streets such as New Street, Tower Street ect, the only way you can walk down those streets is in the road, the kerbs either side are unpassable due to parked cars, I appreciate that I am not talking about the new estates which will have parking spaces provided, but we have a system where at weekends everybody has to drive into town and then join in the game of find somewhere to park. The doctors surgery is overloaded, we have one pharmacist in town (waiting time 1 to2hours) The schools are full to overflowing and still you are inviting more families into town. But maybe I have got this wrong, maybe the council is going to rebuild the infrastructure for us and lead us into a bright new tomorrow? Whatever you do it will require money, so the next few months should be interesting.		
1208	14000	Bernard Burton [1208]	Objection to the proposed development on this greenfield site, which is valuable open countryside and essential to the character and identity of the town. Further large-scale development would cause urban sprawl, destroy wildlife habitats, and erode the town's distinctive nature. Recent growth has already increased population without corresponding infrastructure improvements. Access relies on a single narrow road that regularly experiences severe congestion, creating safety risks and isolation during disruption. Parking, schools, healthcare, water supply and sewage systems are already under significant strain. The site is poorly located for walking, would increase car dependency, and offers limited employment opportunities. Development should be directed to more suitable locations that protect the countryside and sustain the town's future.	Object	
1198	14001	Lucy Pearce [1198]	SAH4 To Add 300 homes onto our road is a nightmare. My Husband already has had to 30 Minutes to his journey each day . We can't get Doctors Appointments or Dentist The proposed area is flooded, but full of wildlife, birds, bats and badgers. Use of smaller sites to lower amount of housing may work. 300 Houses equates to 600 cars plus. approx 1000 people Where do you propose our infrastructure can be upgraded to accommodate these? Silly proposals. Other areas much more open, near main roads use these first.	Object	

1235	14004	William Williams [1235]	We object to the proposed 300?home development east of Church Road due to the serious traffic and infrastructure impacts it would create. Brightlingsea is served by a single access road that already experiences severe congestion and long delays during incidents or roadworks, sometimes leaving the town effectively isolated. Adding 300 homes would significantly increase peak-time traffic, worsen safety risks, and hinder emergency access. Local infrastructure—including schools, GP and dental services, sewerage and parking—is already under strain, with no realistic capacity for further growth. The site is poorly located for walking to the town centre, increasing car dependence. Until an alternative access route exists, development of this scale should not proceed.	Object	
1677	14005	Joyce House [1677]	Objection to 300 Houses on outskirts of Brightlingsea. Lack of infrastructure.	Object	
1675	14007	Joanne Linton [1675]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1276	14012	Tracey Barton [1276]	I object to the proposed development at Samsons Road, Brightlingsea (Policy SAH4), not in principle to development itself, but to the scale proposed. Brightlingsea does not have the infrastructure to support such a large development, with significant existing issues including severe traffic congestion, limited healthcare provision, lack of school places, and insufficient parking. There are also concerns regarding flood risk and impacts on local wildlife, including protected species. Smaller-scale development would be more appropriate, but this proposal is excessive and would place unsustainable pressure on the town, with impacts that could not be reversed.	Object	
1619	14013	Jane Matchett [1619]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings	Object	

			or how emergency access would be maintained during periods of congestion or road closure.		
1227	14014	Mr Martin Lovelock [1227]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1225	14015	Mrs Shirley Lovelock [1225]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1327	14016	Ann Burton [1327]	Objection to the proposed development in Brightlingsea due to severe infrastructure and sustainability constraints. The town has only one access route, which already experiences daily congestion, and additional homes would significantly worsen traffic with no local employment to offset car use. Water supply and sewage systems are already overstretched, while flood risk is a serious concern given the site's downhill position and proximity to flood-prone areas. Over 300 homes would generate substantial demand for schools, GP services, and pharmacies, all of which are already at capacity. Without major investment in roads, utilities, healthcare, education and employment, the proposal risks creating long-term social, environmental and economic harm.	Object	
1194	14021	Catherine Margaret Smith [1194]	Objection to SAH4 - please see attached document, handwritten rep form. Negative impact on Pharmacy, Drs, Schools and there is only one road in/out	Object	
1612	14022	Michael Kruse [1612]	Brightlingsea is a small town of around 8,500 people with only one road in and out. Recent roadworks have already caused delays of up to an hour, creating serious concerns for emergency access, work, and school travel. The proposed development of 300 new homes would add around 750 people, worsening congestion and placing further strain on already insufficient doctors, schools, and infrastructure. With limited access and existing delays, adding this level of	Object	

			development would be unsafe and poorly planned. A more suitable location should be considered.		
1720	14023	Valerie Kruse [1720]	Brightlingsea only has one road in and out, so any more houses will create greater traffic congestion. There are not enough doctors and dentists in the village to accommodate such growth, as well.	Object	
1671	14024	Linda McGrath [1671]	My objection to SAH4 One road in and out of Brightlingsea. Very busy in rush hour already. The schools are already to capacity. Doctor surgery already stretched.	Object	
1668	14025	Barry Burgess [1668]	Objection to Policy SAH4, which proposes around 300 new homes in Brightlingsea. The town is served by a single congested B-road, making it vulnerable to isolation during accidents or roadworks and risking delays to emergency services. Local healthcare, schools and public services are already operating beyond capacity, with no clear plan for expansion. Brightlingsea has poor public transport and relies heavily on private cars, conflicting with sustainable development principles. The proposal is therefore unsustainable, unjustified, and should be removed from the Local Plan.	Object	
1481	14028	Malcolm Bennett [1481]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1663	14029	Shannon Doig [1663]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1277	14030	J Burton [1277]	Objection to the proposed allocation as it would result in the loss of valuable greenfield countryside, harm wildlife and erode the character of Brightlingsea. The town has already experienced significant housing growth without matching infrastructure improvements. Access is via a	Object	

			single narrow road already suffering congestion and safety issues, which cannot accommodate further traffic. The site is poorly located for services, encouraging car dependency and worsening parking problems. Local utilities, healthcare, schools and employment opportunities are already overstretched. The development is unsustainable and should be redirected to a more suitable location.		
1146	14031	David John Steed [1146]	Objection to building proposal of 320 houses. I wish to object strongly to the proposed building of 320 houses in Brightlingsea. I moved here 19 years ago from London for a more settled life style. This proposal would increase pressure on local services i.e. doctors (already difficult to get appointments), chemist, dentist, schools etc. Then you have the vast increase of traffic congestion. Also, we do not want another road coming into Brightlingsea.	Object	
1479	14032	Mrs Juliet English [1479]	Object to 300 house new development off Samsons Road Brightlingsea. Road into and out of Brightlingsea overloaded. Unnecessary large development not needed to satisfy area development in local plan.	Object	
1234	14033	Nina Greenwood [1234]	-Only one road into Brightlingsea -Already at capacity at rush hour. (more houses = more cars) -Doctor's surgery also already busy. My comments refer to the 300 homes planned for Brightlingsea east of Church Road.	Object	
1233	14034	Pat Chapman [1233]	My letter is from a retired person from London 15 years ago. Life in Brightlingsea has changed by over crowding this covering not enough schools, Doctors, Chemists, no banks and most of all the dangerous crowding on the roads. To build more housing is making our small town a dangerous place to live, being a lack of safe housing, transport, and green play for our children and lands to bury the dead,	Object	
1232	14035	Jason Greenwood [1232]	The road into Brightlingsea is already at capacity with out 300+ new cars joining. Lack of doctors/dentist/schools Better location at Elmstead where new can be built My comments refer to the 300 houses planned for Brightlingsea.	Object	
1193	14037	Janet Buck [1193]	Tendring District Council has already exceeded its allocation of housing. Brightlingsea has already accommodated a new housing estate off Robinson Road and does not need any more new housing. The infrastructure cannot cope now i.e. one road in and out of	Object	

			Brightlingsea. Doctors and dentists and pharmacy is at full capacity. It would ruin the character of our beautiful town.		
1275	14038	K & T Shaw [1275]	1) We back straight onto the field which is always water logged when is rain our garden is flooded . 2) We moved in 2025 and its a bungalow and are now worried about houses, looking into our living room plus blocking out the small amount of sun we get. 3) We are right next to a large hedge which splits the field and feel we will lose the wild life that live in it. Monkjack/Phasants/Blue tits/Robins/ even have seen Hares running about. And when it rains which leaves a small pond there are ducks etc swimming. Plus the owls and bats at nights 4)The road will not cope with another 400 plus cars as the site is at the end of walton only one way in. There is already 200 new homes there. 5) The doctor surgery is over loaded 6) Plus come the summer it gets more traffic in the town, we just won't be able to cope. 7) I do understand we need more home ,but there are a load more open areas around .That would make more sense and would keep the traffic away from the end of the town.	Object	
1207	14039	B Cardy [1207]	Dear Sirs I am horrified at the thought of you adding 300 more houses to Brightlingsea. Up until recently I was a resident of Brightlingsea, born and bred inthe town, attending the local schools and working in Brightlingsea based businesses. My Parents, Grandparents, Daughter, Sisters and family still live in Brightlingsea. I am a Fire Officer and to add this extra amount of housing is putting the town at risk, you cannot get in or out of the main road as it is at the moment. The Brightlingsea Road has been blocked several times in recent months and not through accidents or incidents occurring on Brightlingsea side but through accidents on the main road into Brightlingsea, Thorrington side. The Council or, as I am aware of the Government dictating, has a legal duty for safety as well as proper, supported infrastructure which this proposal has neither. This is without all the other arguments, environmental, flooding, can't get water in or waste water out, schools, dentists doctors and the list is endless I urge you to seriously reconsider this proposal	Object	
1198	14043	Lucy Pearce [1198]	SAH4 To add 300 homes onto our road is a nightmare. My husband already has had to 30 minutes to his journey each day. We can't get Doctors appointments or Dentist. The proposed area is flooded, but full of wildlife, birds, bats, and badgers. use of smaller sites to lower amount of housing may work. 300 houses equates to 600 cars plus. approximately 1000 people.	Object	

			Where do you propose our infrastructure can be upgraded to accommodate these silly proposals. Other areas much more open, near main roads. use these first.		
1293	14044	Stuart Vint [1293]	I would like to express my concerns over the proposed 300 new homes on Samsons Road in Brightlingsea. I live on Samsons Road and am very concerned that a potentially extra 800-900 people plus their cars, possibly 3 each, is unsustainable for the area. The local infrastructure is not up to it either. Currently the one and only doctors surgery is struggling so how would it cope with this extra community.	Comment	
599	14048	Joanna Stockwell [599]	I am writing with reference to the 400 new homes you are proposing in Brightlingsea, this isabsolutely ridiculous, we have one road in and one road out, one doctors surgery, one chemistwhich is always a half hour wait, no room in the dentists, not enough room in the schools and no room for another 400 houses. Every spare piece of land has been built on, there is a huge development on Robinson Road/Mill Street which was a wildlife area, I am now seeing pheasants in my garden in Chapel Road which is not normal, because their habitat has been destroyed. We do not want any more homes.	Object	
1195	14049	Marie Scales [1195]	My comments on SAH4 at Samsons Road relate to the impact of scale on Brightlingsea. As a community worker, I already experience significant delays leaving the town, adding 30–40 minutes to daily journeys. The town has limited infrastructure, with difficulties accessing doctors and dentists, and insufficient parking. The development would add substantial traffic, potentially up to 1,000 more cars, which the road network, particularly at Thorrington Cross, cannot accommodate. There are also concerns about loss of open space, impacts on heritage buildings, and increased pressure from existing holiday traffic. Smaller developments may be acceptable, but this scale is not appropriate.	Object	
1147	14050	Miss Sandra Craig [1147]	Objection to Policy SAH4, which proposes around 300 dwellings in Brightlingsea, as the town's infrastructure is already severely constrained. Brightlingsea relies on a single congested B?road with limited resilience, posing risks to safety and emergency access. Local healthcare, education and public services are operating beyond capacity, and there is no clear evidence that additional provision could be delivered. Poor public transport means residents are heavily car-dependent, conflicting with sustainable development principles. The proposal is inconsistent with the NPPF and should be removed from the Local Plan.	Object	
1192	14051	Patrick Tanner [1192]	Brightlingsea is very much overcrowded now, with the proposal of over 300 houses where are people going to park in the town itself. We have one dedicated car in the town centre and one at the bottom of Tower Street. There's only one chemist which is working to capacity and a	Object	

			relatively small doctors surgery. The sewage works will need increasing to cope with the extra housing. The schools are full to capacity. Where is the extra water storage going to come from? Our roads in the town are blocked at the moment, how is it going to cope in the future?		
1476	14056	Caroline Nodes [1476]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure	Object	
1228	14057	Amanda Schenk [1228]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1230	14064	Connie Linton [1230]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1144	14069	Amanda Carlyle [1144]	The infrastructure in Brightlingsea cannot cope with another 325 homes. Doctors, pharmacy, schools, Dentist etc.	Comment	

			Single road in and out of town.		
1670	14073	Beverley Bright [1670]	Limited access for ambulances - other emergency services, doctors, dentists, refuse collection, school's, pharmacy's, won't be able to cope. utilities, mobile phones service, hospitals, funerals, maternity, pot holes roads & paths.	Object	
1612	14081	Michael Kruse [1612]	Due to only one road in and out 1. Major problems in Emergency Exist from Brightlingsea 2. Insufficient Doctor and Schooling Infrastructure 3. Regent Road works already caused major delays of 45 mins to 1 hours (Councillor Apologised) Now considering 300 more houses (approx 750 more people) Brightlingsea is a small town with approx 8500 people. This proposed development of 300 homes will increase population to around an extra 10% more. As we are well aware that the infrastructure struggles to support this population let alone approx 750 more people. The most dangerous aspect of the project is one road in and out. This causes major delays as recently as 12th and 13th February. Causing delays of up to 1 hour. For local people trying to get to work and schooling and various other appts. So imagine the danger of adding a further 750 people to that problem! Also insufficient doctors, schools, etc. and bad infrastructure already in our town. This is dangerous and complete and utter stupidity to add this amount of extra people to an area with only one way in and out. Surely if there has to be extra houses, there has got to be a better place than a small town with limited access in and out. We have lived here for 12 years, and noticed how much more difficult it is to get in and out of Brightlingsea. A lot more thought has to go into the best and safest place to build 300 more houses.	Object	
1681	14090	Rudolf Drost [1681]	My comments on the proposed 300–350 houses in Brightlingsea focus on the impact on access, congestion, and infrastructure. The town has a single access road, already creating significant bottlenecks, particularly at Samsons Road and Church Road and extending to Thorrington Cross. Additional development, alongside recent schemes, would worsen traffic and delays, especially during incidents or roadworks. Road conditions are already poor, and parking in the town centre is limited. Local services are under strain, with limited GP provision and no police station. Overall, there is concern that further	Object	

			housing is being proposed without the necessary improvements to infrastructure and services.		
1318	14091	Elizabeth Artindale [1318]	SAH4 is a high density development (300+ houses in 10.97ha, as opposed to 140 houses in 10-66 ha at Cockaynes Lane Alresford) in an area adjacent to two rivers, increasing a flood risk that appears not to have been considered, in contradiction to PPL1. Brightlingsea is a one road access town where highway capacity at Thorrington Cross is already exceeded. So another 300+ cars will only add to this so PP4 local impact threshold is breached. The GP surgery where I work is already over capacity. The one cycle path in that area is already not maintained and is unfit for purpose for much of the year.	Object	
1323	14098	Jackie Edmunds [1323]	Brightlingsea is a small town with over-subscribed facilities - doctors, schools. There is only one fairly narrow road in and out of the town. Any breakdown, accident, road maintenance causes standstill. I am objecting to the Council's vision, which is not taking into account the actual problems: 1. Infrastructure - does the vision include schools, doctor surgery, etc.? 2. The road in and out - the road into Brightlingsea is just about wide enough for two-way traffic, but not wide enough for overtaking. Traffic often at a standstill: - for volume at peak times - for vehicle break-down - accidents - very dangerous turns at bottom of hill after the church, I have experienced hold-ups for several hours after a vehicle over-turned at the bottom of the hill.	Object	
1665	14101	Alan Stevens [1665]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely	Object	

			accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.		
1673	14102	Jason McGregor [1673]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1672	14103	Jack Linton [1672]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1674	14104	Gary Cowell [1674]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1676	14105	Frances Chasney [1676]	My comments relate to concerns about environmental and infrastructure impacts. Development would harm the setting of All Saints Church, a Grade I listed building, and the surrounding natural environment. The town has only one road in and out, which is already dangerous and congested. Additional housing would worsen traffic problems and place further strain on already limited infrastructure. There are insufficient doctors, dentists, schools, opticians and parking provision. The town is already crowded, and a development of around	Object	

			350 homes would place unsustainable pressure on both services and the local area.		
1664	14106	Nicola Aspden [1664]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1686	14108	Shelley Bath [1686]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1684	14109	Deborah Rae [1684]	I object in the strongest possible terms to the suggestion that Brightlingsea could accommodate up to 300 additional homes. GP and dental services are already at capacity, with long waiting times and limited appointments. The town has only a single access road, where even minor disruption causes significant congestion. Schools are already full, including pupils from surrounding villages. There is no infrastructure in place to support this level of growth, which could increase the population by around 1,200 people, placing further strain on already overstretched services.	Object	
1280	14112	Pauline Smith [1280]	We need to ensure the infrastructure can support the development - Water, waste, schools, doctors, etc. The single access road concerns me. The B1029 can be difficult and I worry that it can not cope with the increased traffic. Mitigation in the form of greatly increased public transport would help as would genuinely joined up cycle paths. Currently it is not possible to move safely by bike nor to safely cycle around the town itself New housing should be required to have solar panels on the roofs. New housing should have adequate open space and provision for	Comment	

			residents to shop and socialise. Yes we need housing so young people can access housing, but not at the cost of other residents and the environment.		
1200	14113	Tania Bines [1200]	The town's facilities are struggling to cope with the increase we have already seen example road in and out of schools. Doctor surgery etc. of Brightlingsea.	Object	
1143	14114	Ken and Margaret Logue [1143]	We have owned a house in Brightlingsea for almost 50 years on Mill Street. In this time we have seen Brightlingsea grow substantially but the one road into/out of the town has not changed. This small town cannot take any more houses, traffic and people. The town is very congested with the vehicles. Most people have to travel to employment out of the town now as the ship building yards have gone. We regularly have drain/sewage issues and car parking is a very large issue. We strongly object to this proposal of 300 + more homes.	Object	
1475	14116	Isaac Mulezuma Ajubvu [1475]	Objection to Policy SAH4, which proposes around 300 new dwellings in Brightlingsea. The town has severe infrastructure constraints, relying on a single congested B-road with limited alternative access, posing risks to safety and emergency services. Local healthcare, education and public services are already overstretched, with insufficient GP, dental, pharmacy and school capacity. Brightlingsea lacks sustainable transport options and is heavily car-dependent. The Local Plan fails to demonstrate how transport, healthcare, education or emergency infrastructure would support this growth. The allocation is therefore unsustainable, unjustified and inconsistent with national planning policy and should be removed.	Object	
1478	14117	Antony Cook [1478]	Objection to Policy SAH4, which proposes around 300 new dwellings in Brightlingsea. The town has severe infrastructure constraints, relying on a single congested B-road that is vulnerable to closure and poses risks for emergency access. Local healthcare, education and public services are already overstretched, with limited GP, dental, pharmacy and school capacity. Brightlingsea lacks sustainable transport options and is heavily car-dependent following the loss of rail services. The Local Plan fails to demonstrate how required infrastructure would be delivered. The allocation is unsustainable, unjustified and contrary to national planning policy and should be removed.	Object	
1152	14126	Mr & Mrs James Rudrum [1152]	The proposal to build a further 325 homes in Brightlingsea fails to acknowledge the already overburdened road infrastructure and the inadequate provision of public transport. SAH4 is inconsistent with the NPPF, and the addition of 300+ homes would worsen existing congestion, undermine highway safety and resilience, and conflict	Object	

			with the sustainable spatial approach required by policies CP1 and CP2.		
1480	14129	Mrs Susan Tuley [1480]	The proposed site access in Samsons Road is a narrow road with no restricted parking, so nearly always single carriageway in places. The junction with Church Road is always busy as at peak times there is very limited opportunity to join the main road. There is not the infrastructure in Brightlingsea to cater for 300 more families. There are no NHS dental places. Waiting times for pharmacy and doctors are long.	Object	
1282	14130	Shelley Taylor [1282]	Brightlingsea only has one main road, in, and out of the town. Only public service, for transport is getting a bus, i you don't drive. Not enough infrastructure, to support these new builds either. Infrastructure is a main concern. This will put unsustainable pressure on local infrastructure like roads, and schools, and other public services. Before even planning to build new homes, the public services need to be carefully considered, in the first instance. Not just that, but also if there is an accident on the road, on the way out, or into Brightlingsea, then you can be stranded/stuck for hours!! Please use your common sense.	Object	
1661	14134	Dawn Webster [1661]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1154	14135	Richard Price [1154]	There are concerns over infrastructure, with regards to drinking water, sewage works, B109 road, doctors surgery, dentist surgery, pharmacy, A1115. Given the projected population growth, infrastructure will be unable to support the area.	Object	
1680	14142	George Rae [1680]	I object in the strongest possible terms to the suggestion that Brightlingsea could accommodate up to 300 additional homes, as there is no clear plan or commitment to provide the necessary infrastructure. Local GP and dental services are already overstretched and unable to meet current demand. There are also concerns	Object	

			regarding water and sewage capacity, with evidence of existing strain. Brightlingsea relies on a single access road, which is already prone to severe congestion and disruption. Without significant and deliverable improvements, this level of development would place unacceptable pressure on services and transport.		
1297	14146	James Howes [1297]	My representation mainly concerns the impact on the character of the town and the impact on travel and transport.	Object	
1474	14150	Patricia Ashton [1474]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1155	14152	Lesley Jennifer Hogg [1155]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1160	14153	Clifford Neale [1160]	Objection - traffic congestion, existing overdevelopment, destruction of green belt/farmland and outside existing town boundary.	Object	
1696	14158	Teresa Simons [1696]	My comments relate to concerns about further development in Brightlingsea and the strain on existing infrastructure. The town has only one access road, where even minor disruption can cause major delays, raising concerns about how additional traffic from new housing would be managed. Local healthcare services are already stretched, with long waits for appointments and tests, and schools are at or near capacity, affecting education standards. There is also concern about limited recreational space, with existing facilities already heavily used. Overall, the scale of further growth raises serious concerns about the town's ability to cope.	Object	
1695	14211	George Simons [1695]	Only one road into Brightlingsea. Classrooms are full already. Infant and junior schools are swamped	Object	

			Not enough doctors, nurses had to wait 3 weeks for a blood test. Brightlingsea has had so many houses built in the last 5 years already. Robertson Road If the development of some kind of 'village' gets to go ahead - Brightlingsea would already be swamped with houses. Some mornings/most mornings it can take up to 20 minutes to get out of Brightlingsea. The water company states that the pumping is at its full capacity already - and couldn't cope with any more. We don't want anymore building in Brightlingsea.		
1177	14215	Colin Grant [1177]	The proposed site is too far out from the town. A stretch alongside the Manor Estate (ginlingsfam) is nearer and less obtrusive. The towns infrastructure hasn't been in proved in 15-20 year. E.G. There is a shortage of doctors. Each Dr has 2008 patients the worst in the country according to the E.C.S. March 6th.	Object	
1689	14217	Pauline Garrard [1689]	Object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	
1688	14218	Pauline Herbert [1688]	The infrastructure of Brightlingsea will not be able to cope. Schools, Drs etc are almost full to capacity and the one road in/out cannot take any more. We need guaranteed more services to support this proposal.	Object	
1687	14219	Pat Henderson [1687]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings	Object	

			or how emergency access would be maintained during periods of congestion or road closure.		
1678	14221	Philip Chapman [1678]	Concern that there has been a lack of consultation with nhs services, opticians, schools regarding the proposals for Brightlingsea. Affinity Water are struggling to provide enough fresh water, and similarly Anglian Water removing waste water. The road in/out is not suitable for increased levels of traffic. Concerns about possible new quarry to the east of Brightlingsea Road.	Comment	
1666	14222	Amanda Tedman [1666]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure	Object	
1685	14223	Graham Chasney [1685]	Damage to environment around All Saints Church. One road in/out - very dangerous, traffic problems. Infrastructure. Not enough Drs, dentists, opticians, schools and parking both retail and street. The town is already crowded and another 320 family homes will be a disaster.	Object	
1683	14225	Brenda Drost [1683]	1.This objection concerns the larger estate of approx 350 houses off Samson Rd. 2. it is ok to infill in small areas and improve old buildings. 3. I was the Practice Nurse here for 25 years and know it is important to have ambulance/police access and doctors facilities plus dental for all residents. It is already overstretched and ther is not money or facilities ear amarked for extending the population. 4. Already, the sixth form has closed, so young people have to travel (cost of buses) over the age of 16 years for further education. 5. We are all told to exercise and use the natural environment to enable us to live healthy lives, both physically and mentally. Leave us open areas and the sea to be able to appreciate this. 6. Open piece of land opposite Chestnut Way where residential home for elderly closed and building flattened. This should not be allowed to not rebuild or provide a new residence for the elderly. (not included in new plans)	Object	
1246	14297	Robert Holland [1246]	Farm land and green space in Brightlingsea has been built on since the last World War. This has adverse effects on the community and character of the area.	Comment	

1512	14380	Roger Tabor [1512]	Although mitigation could be incorporated into the development process, the impact of the suggested development would cause traffic congestion, landscape loss, and character impacts relating to Grade I building and Coastal needs. Drainage, sea level rise, and green space are major concerns alongside the development.	Object	
1644	14381	Richard Turner [1644]	Objection to SAH4 due to concerns about traffic and the one road in and out. Rising sea levels and changing weather patterns mean the road is at a greater risk of flooding. Has a flood assessment been done? Have the impacts of potential natural disaster been risk assessed? The need for emergency ambulance services is increasing with an aging population. Therefore, roads should be considered further.	Object	
1679	14382	M J Powell [1679]	In order to have 1,200 New people (4 per household) you need to build a new doctors surgery, new dentist/NHS and a new supermarket. In order to have the number of cars you need to widen the road from All Saints Church & Thorington - Try travelling now when Lorry and bus have to go into the verge in order to pass.	Object	
1229	14456	Mr Adam Cooper [1229]	I object to Policy SAH4 which proposes approximately 300 additional dwellings in Brightlingsea. Brightlingsea has severe infrastructure constraints and is effectively served by a single B-road which acts as the only practical access route into and out of the town. This road already experiences significant congestion during peak hours and lacks footpaths in several sections. Any accident, roadworks or obstruction can effectively isolate the town and delay access for emergency services. The Local Plan does not demonstrate how the local highway network could safely accommodate the additional traffic generated by 300 further dwellings or how emergency access would be maintained during periods of congestion or road closure.	Object	

Policy SAH4: Development of Land East of Church Road, Brightlingsea

Summary of Representations

Site SAH4 has been removed from the Local Plan following Regulation 18 consultation. This reflects concerns regarding the scale of development, infrastructure capacity (particularly highways and local services), and impacts on the character of Brightlingsea. Growth in the town has been reduced and redistributed to smaller, more appropriate sites, resulting in a lower overall housing figure.

Policy SAH6: Development of Land East of Cockaynes Lane, Alresford

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3652	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	SAH6 offers strong opportunity to deliver safe, resilient, policy-aligned green access network by upgrading PRoW 20 and PRoW 2 to multi-user route (MUR) linking them to form a circular perimeter route. This approach meets NPPF 92, 104, 112, which require inclusive, well-connected active-travel networks and prioritisation of vulnerable users, and aligns with Essex Design Guide and ROWIP emphasis on continuous PRoW integration. A circular MUR would provide safe, off-road movement for walkers, cyclists and equestrians, support older and less mobile residents in accessing green space, act as a fire-break corridor along the edge, and integrate into a coherent movement loop.	Comment	Though the Local Plan supports active travel networks through Policy CP1, providing a site-specific MUR is outside the remit of the Local Plan. Specific travel routes are considered within the updated transport modelling commissioned by the Council, and will be considered further at the application stage of the allocation.
1654	13514	Natural England (Jonathan Burt) [1654]	Together, these two adjacent sites allocate 140 new residential dwellings in a location approximately 1.5km from the Colne Estuary SPA. As such, Natural England advice is that these two adjacent sites combined will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites. The recreational disturbance impacts of the two site allocations could be mitigated by a financial contribution to the Cockaynes Wood Trust, as this area of accessible semi-natural woodland habitat is immediately to the west of the proposed site allocation SAH6 and therefore likely to be used by new residents of both allocations for daily recreational activities	Comment	The Council acknowledges Natural England's advice regarding recreational disturbance impacts on the Essex Coast Habitats Sites. Policy SAH6 will be amended to require appropriate mitigation in accordance with Policy PPL4, the Habitats Regulations and Natural England guidance. Contributions towards suitable mitigation measures, including enhancements to accessible natural greenspace where justified, will be explored through the planning application process.
823	13574	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan.	Comment	The Council welcomes Essex County Council's support for the biodiversity requirements of the policy. Policy SAH6 will be amended to strengthen references to multifunctional Green and Blue Infrastructure, support the priorities of the Essex Local Nature Recovery Strategy, and promote active travel and improved connectivity to the wider countryside and surrounding settlements.

			Suggested additional wording. “f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network.”		
Businesses, Landowners and Developers					
1336	4341	Pigeon [1336]	The proposed strategic allocation at land off Cockaynes Lane in Alresford is supported, and it is requested that this allocation is retained in emerging TDLPR. A minor change is requested to Policy SAH6, which is that the references to Site Ref. MSA7 are deleted from criteria (d) and (e).	Support	The suggested amendments regarding references to Site MSA7 has now been reviewed as part of the policy refinement process and with additional working that has been brought on it is considered that the wording remains clear, effective and consistent with the intended relationship between the two allocations.
Community Representatives					
953	3545	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
235	6851	Alresford Parish Council (Mr Matt Cooke, Alresford Parish Council Clerk) [235]	Land to the east of Cockaynes Lane has been earmarked for development, however previous applications for housing have been refused by the Planning Inspectorate, with the reason being that the community has already absorbed substantial housing. The impact on the environment cannot be overlooked and the lack of open spaces for recreation has been highlighted many times. The village primary school is often over-subscribed and some residents have had to endure excessive school run distances in order to secure a school placement for their children. Further, in spite of our recent increase in properties and population we still have no NHS Doctors or Dentists in the area that are accepting new residents. It is acknowledged that the site suggested for 140 homes is the only potential area for development in the Alresford area. However, the Parish Council’s view is that further development in Alresford on the scale suggested is not sustainable without full commitment to the Infrastructure Delivery Plan set out on Page 86 of the Planning Policy and Local Plan Committee Report dated 22 January 2026.	Comment	The Council acknowledges the Parish Council’s concerns regarding the planning history of the site, infrastructure capacity and the cumulative effects of growth in Alresford. Site selection has been informed by a comprehensive assessment process and a robust evidence base, taking account of planning constraints, sustainability considerations and the need to meet significantly increased housing requirements arising from national policy. The Council recognises that additional development will place demands on local infrastructure. Accordingly, the Local Plan is supported by an updated Infrastructure Delivery Plan (IDP), and the Council will continue to work closely with education, healthcare, highway and utility providers to ensure that appropriate infrastructure and mitigation measures are delivered alongside growth. The policy also includes requirements for relevant infrastructure contributions and other site-specific mitigation as necessary. Whilst acknowledging the concerns raised, the Council considers the allocation to be a suitable and sustainable location for growth, subject to the safeguards and infrastructure requirements set out in the policy and wider Local Plan framework.
Members of the Public					
581	4161	Mrs Sally Webb [581]	up to 100 new houses, this will change the face of Alresford and it is sprawling as it is with no real centre. Farm land building = No.	Object	The Council recognises concerns regarding the loss of agricultural land and the potential impact on the character of Alresford. In seeking to meet the District’s identified housing needs and national policy requirements,

					the Council is required to allocate a number of greenfield sites, reflecting the limited availability of previously developed land. The allocation has been selected through the Local Plan site assessment process, taking account of sustainability, landscape, environmental and infrastructure considerations. The policy includes requirements relating to landscaping, green infrastructure, biodiversity net gain and the integration of development with its surroundings in order to mitigate impacts and protect local character as far as practicable. On balance, the Council considers the allocation justified and capable of being delivered in a sustainable manner consistent with the overall spatial strategy of the Local Plan.
1161	13931	Dave Wendon [1161]	I have opposed the current planning application for a site entrance off Cockaynes Lane that will create further destruction but in light of the government demands Alresford will have to expand further, but must do so without visual destruction or that of the village character. If sites SAH6 and MSA7 are to be approved for development there needs to be agreement between land owners and previous planning applicants for these two sites to be treated as one. There is a need to preserve what's left of the ancient Cockaynes Lane nature, provide a linked footway through the two sites for shorter access to the centre of the village and station, (thus reducing the need for car use), and realigning the B1027 exit of Cockaynes Lane so that it is combined with the access to these sites via a right turn refuge off B1027. The combined road will improve the access and visibility of traffic that already need to use that junction.	Comment	The Council acknowledges the comments regarding village character, connectivity and access arrangements. The policy already promotes a coordinated approach to development of SAH6 and MSA7, and opportunities for integrated access, improved pedestrian and cycle links, and appropriate highway improvements will be considered through the planning application process in consultation with the relevant landowners and highway authority.

Policy SAH6: Development of Land East of Cockaynes Lane, Alresford

Summary of Representations

Representations on Policy SAH6 focused primarily on infrastructure capacity, biodiversity and ecological impacts, Green and Blue Infrastructure, recreational disturbance impacts on the Colne Estuary SPA, active travel and connectivity, landscape character, and the principle of further growth in Alresford. Natural England raised concerns regarding recreational impacts on Habitats Sites arising from SAH6 in combination with adjoining allocations, whilst Essex County Council supported the biodiversity requirements and sought stronger Green and Blue Infrastructure and active travel provisions. Community responses highlighted concerns relating to landscape impacts, loss of agricultural land, village character, healthcare and education capacity, and the cumulative effects of growth. The Council concluded that the allocation remains a suitable and sustainable location for development, subject to appropriate ecological mitigation, infrastructure provision and environmental safeguards.

In response to the representations submitted, changes have been made to Policy SAH6. With regard to the biodiversity and ecological impacts of the development, the policy was amended to require appropriate mitigation for recreational disturbance impacts on the Essex Coast Habitats Sites in accordance with Policy PPL4, the Habitats Regulations and Natural England guidance, and references to multifunctional Green and Blue Infrastructure have been strengthened in the policy wording. These changes, alongside additional changes to wording, ensure SAH6 better aligns with Policies PPL4 and PPL4a and support delivery of priorities identified within the Essex Local Nature Recovery Strategy. Additional policy wording was incorporated to promote active travel and improve connectivity to the wider countryside, surrounding settlements and local services where feasible. Separate to policy wording, the relationship between SAH6 and the adjacent MSA7 allocation was reviewed to ensure the policy wording remained clear and effective. However, no changes were made requiring a site-specific multi-user route, as detailed rights of way proposals and route design were considered more appropriately addressed through transport assessments and the planning application process. No changes were made to the scale of development, allocation boundary or overall development strategy for the site. No changes were made in response to objections relating to the principle of development, previous planning decisions, agricultural land loss or infrastructure concerns beyond the existing policy and Infrastructure Delivery Plan approach, as the Council concluded these matters could be appropriately addressed through the Local Plan framework, planning obligations and the development management process.

Policy SAH7: Development of Land East of Admirals Green and North of Weeley Road, Great Bentley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Proposed change to Local Plan	Council response
Technical Stakeholders					
791	3721	Sport England (Mr Roy Warren, Planning Manager) [791]	Part b of the policy is welcomed in relation to the provision of public open space incorporating community sports facilities. The development provides an opportunity to help meet local sports facility needs in the Great Bentley area for both the development and the existing local community.	Comment	Support for part b of Policy SAH7 is noted.
823	13575	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. “f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network.”	Comment	Policy SAH7 has been amended to strengthen references to multifunctional Green and Blue Infrastructure, support the priorities of the Essex Local Nature Recovery Strategy, and promote active travel and improved connectivity to the wider countryside and surrounding settlement.
148	14492	Environment Agency (Environment Agency) [148]	Again, the policy wording doesn’t acknowledge the site’s proximity to several watercourses, including Tenpenny Brook. Weeley Road is partially affected by Flood Zone 3. It should be ensured that any flooding that impacts the access to the site is fully assessed with risks appropriately managed. There should be specific reference to riparian habitat protection, sensitive (bat-friendly) lighting to protect	Comment	The Council acknowledges the comments regarding watercourses, biodiversity and flood risk. These matters are addressed through the policy’s existing flood risk, SuDS and biodiversity requirements, together with the Council’s SFRA evidence and relevant Local Plan policies. Detailed assessment and any necessary mitigation measures will be secured through the planning application process.

			wildlife corridors, SuDs designed to benefit biodiversity and a clear strategy for hedgerow management.		
148	14516	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Strategic Housing allocation contains areas of the site at medium and high risk of flooding from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	The Council acknowledges the Environment Agency's comments regarding flood risk assessment requirements and the role of the SFRA evidence base. Relevant flood risk matters up to this stage of the plan have been informed by the updated SFRA and addressed through site-specific assessments where required. The Council is satisfied that these matters are adequately addressed through the existing policy framework and no further site-specific amendments are considered necessary. Detailed mitigation measures, if required, will be covered at the Development Management stage.
Businesses, Landowners and Developers					
609	3838	Hills Building Group [609]	This proposed allocation on the edge of the Rural Service Centre of Great Bentley is supported. This site is the subject of a current outline planning application by Hills Building Group for mixed-use development, providing community sports and residential development in a sustainable location that can contribute towards the Council's five-year housing requirements.	Support	This is noted.
609	3840	Hills Building Group [609]	As set out in our first representation to draft policy SAH7, this proposed allocation at Great Bentley is supported. If required, this allocation could be expanded to north to include the whole of the agricultural field within which SAH7 sits, further contributing towards the Council's housing requirements, as needed.	Comment	Comment noted.
705	4188	Mr Peter Le Grys [705]	See concerns regarding allocation of land on east side of village.	Object	The site has been assessed through the Local Plan evidence base and identified as a suitable and sustainable location for growth. Detailed considerations relating to infrastructure, highways, landscape and environmental impacts will be addressed through the planning application process.
Community Representatives					
953	3546	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
955	14444	Mr Christopher Morris [955]	2 votes for no housing at all. 3 Options for housing sites were put forward.	Object	The Council notes the objection and the outcome of the local consultation exercise. All representations have been considered as part of the site selection process; however, the Council must balance local views alongside the wider evidence base, sustainability considerations and the need to meet identified housing requirements.
955	14447	Mr Christopher Morris [955]	9 votes for sites along Weeley Road/Heckford Road	Support	Noted.

955	14448	Mr Christopher Morris [955]	You will see from the attached forms that people have voted as follows: 144 votes for sites closer to the centre of the village alongside Plough Road and Cinderpath Way	Object	The Council notes the comments regarding alternative site preferences. Site selection has been informed by a comprehensive assessment process and wider evidence base, taking account of sustainability, availability, deliverability, environmental constraints and infrastructure considerations.
Members of the Public					
887	3680	Ms Sarah Bishop [887]	I object: Infrastructure cannot cope now. Road traffic massively heavy:- far too many vehicles and people passing through/living in village. Major parking issues. Excessive speeding of all vehicles. Excess air pollution from vehicles 12 months of the year. People parked and waiting in vehicles running engines either to keep cool in summer or warm in winter. No visible regular policing in village whatsoever - A PCSO is not sufficient - suggest developers are to fund proper policing to keep traffic and general crime rates down. Abusive, aggressive and inconsiderate behaviour becoming widespread across the village, this is a trend.	Object	The Council acknowledges concerns regarding infrastructure capacity, traffic, parking and local services. These matters have informed the site selection process and will continue to be addressed through the Infrastructure Delivery Plan, planning obligations and the planning application process. The Council considers the allocation capable of being accommodated with appropriate mitigation.
1352	4085	Mrs Paula Bland [1352]	Gt Bentley as a village cannot cope with any more development. The primary school and doctors surgery are oversubscribed. The roads are clogged. There is no village parking.	Comment	The Council has undertaken assessments, backed by a robust evidence base, in selecting sites in the Local Plan. Infrastructure has been assessed through updates to the Infrastructure Delivery Plan, including reports on the capacity of schools, roads, surgeries, and other facilities. There is a requirement in the policy to contribute towards healthcare and education where necessary and justified and as set out in the IDP. The Council will continue to work with the relevant infrastructure providers and stakeholders to ensure the growth allocated to Great Bentley is supported with the adequate infrastructure.
581	4162	Mrs Sally Webb [581]	Farm land - this is a No.	Object	The Council recognises concerns about the loss of agricultural land and local character. In order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this land is classified as best and most versatile agricultural land, which limits the ability to avoid such impacts. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of

					environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure.
1040	4273	Mr John Black [1040]	I object to the committee changing the officers original proposal for development to the south of Great Bentley. The original proposal supported a more sustainable pattern of development, reducing reliance on car travel compared to more remote northern sites and therefore not contributing so significantly to parking issues in the centre of the village.	Comment	The Council notes the objection and preference for an alternative location. The selection of SAH7 followed a comprehensive assessment of reasonable alternatives, taking account of site constraints, sustainability considerations, deliverability and the overall spatial strategy. The Council considers the allocation appropriate and justified.
1622	14187	Kay Hurrell [1622]	There are concerns about housing proposals in Great Bentley, with regard to severe traffic and parking problems around the village centre, particularly near the primary school and station area, which already pose safety risks. Congestion is driven by on-street parking, not through traffic. Development south of the railway on Plough Road would be better due to proximity to key facilities, and opposes sites on Weeley Road and east of Heckfords Road because of distance, increased car use, unsuitable rural roads, and impacts on landscape and wildlife. The Parish Council's site preference is questioned as unrepresentative.	Comment	The Council acknowledges concerns regarding traffic, parking, sustainability, landscape impacts and alternative site options. These matters were considered through the site assessment process and wider evidence base. Impacts on highways, biodiversity and landscape character will be assessed in detail through the planning application process, with appropriate mitigation secured where necessary. The Council remains satisfied that the allocation represents a suitable and sustainable location for growth.

Policy SAH7: Development of Land East of Admirals Green and North of Weeley Road, Great Bentley

Summary of Representations

Representations on Policy SAH7 focused on biodiversity and Green and Blue Infrastructure, flood risk and drainage, infrastructure capacity, transport (including highways safety matters) and parking pressures, but also the suitability of alternative sites, loss of agricultural land and the overall sustainability of growth in Great Bentley. Technical stakeholders supported elements of the allocation, including the provision of public open space and community sports facilities, whilst recommending stronger Green and Blue Infrastructure and active travel provisions. Concerns from residents and community representatives centred on pressure on local roads, parking, schools, healthcare and other infrastructure, together with the suitability of alternative locations for development. The Council concluded that the allocation remains a suitable and sustainable location for growth, with impacts capable of being appropriately mitigated through the policy framework, Infrastructure Delivery Plan and planning application process.

In response to the representations submitted, changes have been made to Policy SAH7. The policy was amended to strengthen references to multifunctional Green and Blue Infrastructure and to better algin with Policies PPL4 and PPL4a to support the delivery of priorities identified within the Essex Local Nature Recovery Strategy. Further to this, the policy was strengthened to place greater emphasis on the retention, enhancement and integration of ecological and amenity features within a multifunctional Green and Blue Infrastructure network. Additional policy wording was incorporated to promote active travel and improve connectivity to the wider countryside, surrounding settlement and local services. However, no changes were made in response to the Environment Agency's comments, as the Council concluded that flood risk, drainage, biodiversity and watercourse matters are already adequately addressed through the existing policy framework, Strategic Flood Risk Assessment evidence, and the planning application process. Furthermore, no substantive changes were made in response to objections relating to infrastructure capacity, traffic, parking, agricultural land loss or alternative site preferences, as the Council concluded that these matters had been considered through the site assessment process, Infrastructure Delivery Plan and wider Local Plan evidence base and could be appropriately addressed through mitigation and infrastructure provision.

Policy SAH8: Development of Land East of Amerells Road, Little Clacton

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
823	13576	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. “f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network.”	Comment	Policy SAH8 has been amended to strengthen references to multifunctional Green and Blue Infrastructure, support the priorities of the Essex Local Nature Recovery Strategy, and promote active travel and improved connectivity to the wider countryside and surrounding settlements.
Businesses, Landowners and Developers					
705	4107	Mr Peter Le Grys [705]	This is a site proposed by myself on behalf of the two landowners. Access to the site is under discussion and a detailed scheme is shortly to be submitted for approximately 80 houses.	Support	Noted.
705	4192	Mr Peter Le Grys [705]	See support for site allocation for Amerells Road	Support	Noted.
Community Representatives					
953	3547	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.

271	6966	Little Clacton Parish Council (Daniel Land, Clerk) [271]	We cannot support the Local Plan because the proposed new builds, combined with neighbouring developments, will severely affect residents' quality of life and there is no meaningful infrastructure provision to mitigate these impacts.	Object	The Council acknowledges this representation from Little Clacton Parish Council. The Council agrees that housing targets for the District are over-ambitious. However, the Council has taken an approach which disperses growth across the District through small and large allocations to meet both the short and long term housing goals. The Council has updated its Infrastructure Delivery Plan to inform on where infrastructure facilities are needed to support growth and will continue to work with the relevant infrastructure providers to support these developments.
Members of the Public					
309	3563	Mr Keith Page [309]	I wish to object to the proposal for land east of Amerells Road, Little Clacton, to be included in the Refinded Settlement Boundary, and the building of 100 dwellings. This land has previously had a Strategic Housing Land Avilability Assessment Ref:(RCS 13) for 87 dwellings and was refused due to access issues. NOTHING HAS CHANGED. Access over an unadopted private road is still an issue and includes Health and Safety concerns.	Object	Access arrangements will be subject to detailed assessment and agreement with the Highway Authority through the planning application process. The site has been assessed through the Local Plan evidence base and remains considered suitable for allocation subject to appropriate mitigation.
972	3564	Mrs Rita Page [972]	Objection to land, east of Amerells Rd, Lt Clacton being included in the Plan for development. 1. Previously rejected because of access issues. 2.A respite from urban sprawl, connects with wider countryside, for walkers, horse riders and dog exercise. 3. Concerns on sewerage, drainage and utilities. 4. TDC has excess identified development sites without needing this 5.With an expected 138 vehicles per 100 dwellings (Essex average), an estimated 300 car movements a day poses H&S issues and nuisance to residents. 6. Better option with good access available, on field opposite the Millennium Green, only affecting 5 properties.	Object	The Council acknowledges concerns regarding access, infrastructure, countryside impacts and alternative sites. These matters have informed the site selection process and will continue to be addressed through the Infrastructure Delivery Plan, planning obligations and the planning application process. The Council considers the allocation capable of being delivered with appropriate mitigation.
581	4163	Mrs Sally Webb [581]	Not near the village centre - only one local store in the area - No.	Object	Objection noted. Due to the significant increase in housing need arising from the Government's revised Standard Methodology, the Council has been required to look beyond sites located immediately adjacent to existing village centres and cores in order to identify sufficient suitable and sustainable land to meet its housing requirements.
1172	13909	Dorothy King [1172]	My comments regarding the proposed 100 houses on land at Amerells Road and Feverills Road, Little Clacton, relate to concerns about access, traffic and loss of rural character. There is concern that Grove Road, an unadopted and unmade road, will inevitably be used as a cut-through, which is not practical. Increased traffic during and after development would significantly affect this quiet country lane, used by residents, walkers, and there are also nearby	Comment	The Council recognises concerns about the loss of agricultural land and local character. In order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this land is classified as best and most versatile agricultural land, which limits the ability to avoid such impacts.

			stables and horses. The loss of agricultural land is a major concern, along with the impact on village character. Existing infrastructure, including schools and healthcare, is already insufficient to support further development.		The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure The Council has updated its Infrastructure Delivery Plan to understand where and what types of infrastructure are needed to support development, including schools, surgeries, and roads. The Council will continue to work with the relevant infrastructure providers to ensure growth is supported with the adequate facilities and services.
1248	14052	Mrs Paula Young [1248]	My comments regarding the proposed development on farmland between Amerells Road, Feverills Road and Grove Road, Little Clacton, relate to significant concerns about access, infrastructure, and environmental impact. The site is currently outside the build line and supports important wildlife habitats, including protected trees and species. Access roads are narrow, unadopted, and unsuitable for heavy vehicles, with no clear right of way. Harwich Road is already heavily congested. The village is struggling with traffic, flooding, drainage issues, power supply, and lack of services such as schools and healthcare. There is concern that further development would worsen these issues and harm the character of the area.	Comment	The Council recognises concerns about the loss of agricultural land and local character. In order to meet Government housing requirements, it is necessary to allocate greenfield sites. In Tendring, much of this land is classified as best and most versatile agricultural land, which limits the ability to avoid such impacts. The spatial strategy seeks, as far as practicable, to direct development to the most sustainable and deliverable locations having regard to multiple factors and constraints, including loss of best and most versatile agricultural land. Policies in the Plan provide for mitigation of environmental impacts, including biodiversity net gain, landscape considerations and green infrastructure The Council has updated its Infrastructure Delivery Plan to understand where and what types of infrastructure are needed to support development, including schools, surgeries, and roads. There is a requirement in this policy for the developer to contribute towards necessary infrastructure in line with the IDP. The Council will continue to work with the relevant infrastructure providers to ensure growth is supported with the adequate facilities and services.
1723	14435	Julie Golding [1723]	Petition	Object	The Council notes the petition and the concerns raised regarding the principle and impacts of development. Infrastructure, highways, drainage, landscape and environmental matters have been considered through the Local Plan evidence base and will be subject to detailed assessment and appropriate mitigation through the planning application process.

Policy SAH8: Development of Land East of Amerells Road, Little Clacton

Summary of Representations

Representations on Policy SAH8 focused primarily on infrastructure capacity, access arrangements, highway safety, traffic impacts, loss of agricultural land, the site's relationship with the wider countryside, environmental impacts, and the suitability of the location for development. Essex County Council supported the biodiversity requirements of the policy but sought stronger references to Green and Blue Infrastructure, active travel and delivery of priorities identified within the Essex Local Nature Recovery Strategy. The Parish Council and local residents raised concerns regarding the cumulative impact of growth on roads, schools, healthcare, drainage and utilities, together with access

constraints, loss of rural character and alternative site options. The Council concluded that the allocation remains a suitable and sustainable location for growth, with infrastructure, access, environmental and landscape impacts capable of being appropriately addressed through the policy framework, Infrastructure Delivery Plan and planning application process.

In response to the representations submitted, changes have been made to Policy SAH8. The policy was amended to strengthen references to multifunctional Green and Blue Infrastructure and to better align with Policies PPL4 and PPL4a to support the delivery of priorities identified within the Essex Local Nature Recovery Strategy. Further to this, the policy was strengthened to place greater emphasis on the retention, enhancement and integration of ecological and amenity features within a multifunctional Green and Blue Infrastructure network. Additional policy wording was incorporated to promote active travel and improve connectivity to the wider countryside, surrounding settlements and local services where feasible. However, no changes were made to the scale of development, allocation boundary or overall development strategy for the site. No changes were made in response to concerns regarding access arrangements, as these matters will be subject to detailed assessment and agreement with the Highway Authority through the planning application process. No substantive changes were made in response to objections relating to infrastructure capacity, traffic, drainage, utilities, agricultural land loss, village character or alternative site options, as the Council concluded that these matters had been considered through the site assessment process, Infrastructure Delivery Plan and wider Local Plan evidence base and could be appropriately addressed through mitigation and infrastructure provision. No changes were made in response to the petition objecting to the allocation, as the Council concluded that the matters raised are adequately addressed through the existing policy framework and detailed consideration at the planning application stage.

Policy SAH9: Development of Land South of Clacton Road, St Osyth

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
1654	13517	Natural England (Jonathan Burt) [1654]	This site allocates 100 new residential dwellings on a site approximately 1km from the Colne Estuary SPA. As such, Natural England advice is that this site will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites and will require a minimum of 1.92ha of SANG. However, please note that, in order to provide a 2.3km circular walk that meets NE SANG Guidelines, the minimum viable SANG size is 9-10ha for a densely wooded SANG, and 12-15ha with open habitats such as grassland and SuDS ponds. We strongly recommend that the site allocation boundary be extended to the east to allow sufficient space for the required SANG in addition to the allocated dwellings	Comment	Policy SAH9 has been amended to require the provision of appropriate mitigation, including Suitable Alternative Natural Greenspace (SANG) where required, in accordance with Policy PPL4, the Habitats Regulations and Natural England guidance. The Council does not consider it necessary to extend the allocation boundary, as the detailed form, scale and location of mitigation can be considered through the planning application process.
823	13577	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. "f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network."	Comment	Policy SAH9 has been amended to strengthen references to multifunctional Green and Blue Infrastructure, support the priorities of the Essex Local Nature Recovery Strategy, and promote active travel and improved connectivity to the wider countryside, surrounding settlement and local services.

826	14502	Essex Wildlife Trust (Annie Gordon) [826]	St Osyth is located near the Essex Estuaries SAC, and the allocation at SAH9 has been assessed by the ISA as having uncertain or negative impacts on biodiversity features and landscape character. We note that the allocation policy includes 20% BNG, LNRS requirements, and wintering bird survey requirements — evidencing that the HRA process has informed the policy — and welcome these elements. We consider that the policy should be further strengthened to include a requirement for a dedicated ecological management plan for the site boundaries, particularly given the presence of St Osyth Priory and the associated LoWS network in the vicinity, and should include an explicit commitment to assess and, where necessary, buffer any boundaries that adjoin or approach LoWS or priority habitat.	Comment	The Council welcomes Essex Wildlife Trust's support for the biodiversity, Biodiversity Net Gain and wintering bird requirements within the policy. The policy will be refined to strengthen references to Green and Blue Infrastructure and ecological connectivity. Matters relating to ecological management plans, habitat buffers and protection of Local Wildlife Sites and priority habitats will be addressed through the planning application process in accordance with Policies PPL4 and PPL4a.
148	**14517**	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Strategic Housing allocation contains areas of the site at medium and high risk of flooding from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	Flood risk matters will continue to be informed by the updated SFRA and addressed through site-specific assessments where required. The Council is satisfied that these matters are adequately addressed through the existing policy framework, local plan policies covering flood risk and flood risk mitigation, and no further site-specific amendments are considered necessary.
Businesses, Landowners and Developers					
1395	14229	Bidwells (Ms Alice Maguire, Principal Planner) [1395]	Bennett Homes strongly supports the proposed allocation of Land south of Clacton Road, St Osyth, under Policy SAH9, recognising its ability to deliver sustainable, much-needed housing in St Osyth. However, Bennett Homes object to the development requirement under paragraph h) for 20% biodiversity net gain (BNG) to be delivered, which is disproportionate and unjustified. Paragraph h) of Policy SAH9 should be amended to instead require a minimum 10% BNG in line with national legislation. Bennett Homes also support the classification of St Osyth as a Rural Service Centre under Policy SLP1, recognising its role in accommodating proportionate and responsive growth. In this context, we urge the Council to consider the additional land to the east, within Bennett Homes' ownership, as an extension to SAH9. This land is available and capable of delivering approximately 175 further dwellings, helping to maximise housing delivery in line with the emerging Local Plan's targets.	Support	The objection to the 20% Biodiversity Net Gain requirement is not accepted. The requirement reflects the Council's environmental ambitions, is supported by the evidence base and is applied consistently across the strategic site allocations. The suggestion to extend the allocation boundary is noted; however, the Council considers the proposed allocation to be appropriate in scale and extent and does not propose any amendment to the allocation boundary.
Community Representatives					
953	3548	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.

78	13589	St Osyth Parish Council (Mr Neil Williams, Parish Clerk) [78]	The Parish Council recognises the requirement for Tendring District Council to maintain a robust housing land supply and deliver new homes across the district, in accordance with the policy of the incumbent government. To that end, the proposed site represents the least objectionable and most logical location within the village for accommodating such development. Compared to other, visually sensitive, sites around St Osyth, the land south of Clacton Road offers a contained and proportionate extension to the settlement, capable of integrating with the existing built form whilst limiting wider landscape and environmental impacts. The allocation for up to 100 dwellings of mixed size and type, including policy-compliant affordable housing under Policy LP5, is supported in principle. The proposed site benefits from: • a direct relationship with the existing settlement edge; • proximity to village services, facilities and public transport routes along Clacton Road; • opportunities for pedestrian access to the centre of St Osyth; and • the ability to provide appropriate boundary landscaping to soften visual impact. In respect of landscape and settlement pattern, the proposed location represents a more sustainable and less intrusive option than more remote countryside sites or those affecting more sensitive heritage or coastal environments. Subject to compliance with criteria (c)–(m) of Policy SAH9, particularly in respect of highway safety, biodiversity net gain, surface water management and protection of SPA birds, the site is considered capable of delivering development consistent with the character of St Osyth. Whilst supporting the principle of residential development, this representation objects to the requirement or expectation that further new areas of public open space be created as part of a Unilateral Undertaking by way of a Section 106 (s106) agreement, beyond what is strictly necessary to meet on-site needs. There is already an established play area at Priory Meadow, which is adjacent to the proposed development. This facility provides accessible recreational provision for families and children living to the east of the crossroads in the centre of the village. The creation of additional fragmented green space within the SAH9 site risks: • duplicating existing facilities;	Support	The Council welcomes the Parish Council's support for the allocation and its acknowledgement that the site represents a sustainable and appropriate location for growth within St Osyth. Comments regarding compliance with the policy requirements are noted and supported. With regard to public open space provision and the use of planning obligations, the Council considers that the requirements of Policy HP5 remain appropriate. The precise form of open space provision, any off-site contributions, and potential enhancements to existing facilities such as Cowley Park Recreation Ground will be considered through the planning application process having regard to identified needs, policy requirements and relevant planning obligations tests. The allocation remains justified and capable of delivering sustainable growth alongside appropriate infrastructure and community benefits.

			• increasing long-term maintenance liabilities for the Parish Council; • delivering small, under-used parcels of land that do not meaningfully enhance recreational provision; • diluting investment that could otherwise improve existing, well-established facilities. Tendring District Council's Planning Policy HP5 should be applied proportionately, recognising existing provision within walking distance and focusing on qualitative enhancement rather than quantitative duplication. Instead of requiring further new green space, this representation strongly supports engaging with the developer to secure enhancements to existing community infrastructure, particularly the pavilion at Cowley Park Recreation Ground. Targeted investment here would deliver significantly greater community benefit. If such an agreement were reached, the priorities should include: • refurbishment of the pavilion interior, enhancing its functionality for sports clubs, youth activities and wider community use; • accessibility improvements where required; • improvement of the parking area, which currently requires upgrading, resurfacing and improved layout to ensure safer and more efficient use; • potential energy efficiency upgrades to reduce long-term operating costs. The enhancement of Cowley Park Recreation Ground would: • consolidate recreational activity in a well-used and established location; • provide a clear and measurable benefit to both new and existing residents; • avoid unnecessary proliferation of small open space areas; • support long-term sustainability of village facilities. This approach would be more consistent with sustainable infrastructure planning and better aligned with the Infrastructure Delivery Plan's objective of directing contributions where they		

			generate the greatest strategic value. It is important that the development is capable of delivering sustainable growth and any forthcoming application demonstrates full compliance with the detailed criteria set out in Policy SAH9, including: • safe and policy-compliant access arrangements agreed with the Highway Authority; • strong pedestrian connectivity and integration with existing footways; • sensitive layout responding to topography and settlement character, especially at the southern end of the development adjacent to St Osyth Brook; • robust boundary landscaping and ecological enhancement; • delivery of 20% biodiversity net gain; • sustainable drainage systems (SuDS) with no increase to flood risk; • appropriate wastewater capacity and water efficiency measures; and • wintering bird surveys and appropriate mitigation where required. In summary, the allocation of land south of Clacton Road under Policy SAH9 represents the least objectionable and most sustainable location within the village for delivering housing required by the District Council, on the basis that: • the development should only proceed subject to strict compliance with the detailed environmental, access and infrastructure criteria; and • s106 contributions should prioritise meaningful improvements to Cowley Park Recreation Ground, particularly parking and pavilion facilities, to deliver tangible and lasting community benefit. It should be noted that there is a clear objection to the creation of further green space where existing provision at Priory Meadow already serves the area. This approach would ensure that the Local Plan delivers not only new housing but also proportionate, efficient and community-focused infrastructure improvements that genuinely enhance St Osyth for both existing and future residents.		
Members of the Public					

Policy SAH9: Development of Land South of Clacton Road, St Osyth

Summary of Representations

Representations on Policy SAH9 focused primarily on biodiversity and ecological impacts, recreational disturbance effects on the Essex Coast Habitats Sites, Suitable Alternative Natural Greenspace (SANG) provision, Green and Blue Infrastructure, flood risk, active travel connectivity, biodiversity net gain requirements and the scale and form of open space provision. Technical stakeholders generally supported the allocation subject to strengthened ecological mitigation and Green and Blue Infrastructure requirements. Natural England advised that the allocation would have recreational disturbance impacts on Habitats Sites and require appropriate mitigation, whilst Essex County Council and Essex Wildlife Trust sought stronger references to multifunctional Green and Blue Infrastructure, ecological connectivity and Essex Local Nature Recovery Strategy priorities. The Parish Council supported the allocation in principle, considering it the most sustainable and least harmful location for growth in St Osyth, whilst raising comments regarding the form of open space provision and use of developer contributions. The Council concluded that the allocation remains a suitable and sustainable location for growth, with ecological, recreational and flood risk impacts capable of being appropriately mitigated through policy requirements, planning obligations and the development management process.

In response to representations submitted, changes have been made to Policy SAH9. The policy was amended to require appropriate mitigation for recreational disturbance impacts on the Essex Coast Habitats Sites in accordance with Policy PPL4, the Habitats Regulations and Natural England guidance. Further to this, the policy was strengthened to require the provision of Suitable Alternative Natural Greenspace (SANG), where required, having regard to Natural England guidance and the site's proximity to Habitats Sites. References to multifunctional Green and Blue Infrastructure have been strengthened within the policy wording, and the policy was strengthened to place greater emphasis on the retention, enhancement and integration of ecological and amenity features within a multifunctional Green and Blue Infrastructure network. These changes, along with additional policy wording, have been made to better align with Policies PPL4 and PPL4a and support of the delivery of priorities identified within the Essex Local Nature Recovery Strategy. Additional policy wording was incorporated to promote active travel and improve connectivity to the wider countryside, surrounding settlement and local services. However, no changes were made requiring a specific ecological management plan or prescribed habitat buffers, as these matters were considered more appropriately addressed through the planning application process and existing biodiversity policies. No changes were also made in response to requests to reduce the Biodiversity Net Gain requirement from 20% to 10%, as the Council considered the 20% requirement justified by the evidence base and consistent with other strategic allocations. Furthermore, no changes were made to the scale of development, allocation boundary or overall development strategy for the site, including requests to extend the allocation eastwards. No changes were made in response to Environment Agency comments, as the Council concluded that flood risk matters are adequately addressed through the Strategic Flood Risk Assessment, existing Local Plan policies and site-specific assessment at the planning application stage. No changes were made to the open space requirements of the allocation, as the Council considered that Policy HP5 provides an appropriate framework, with the detailed form of provision and any off-site contributions to be determined through the planning application process.

Policy SAH10: Development of Land South of Colchester Road, Thorpe-le-Soken

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
187	3653	Essex Bridleways Association (Sally McManus, Bridleways Development Officer) [187]	SAH9 must retain and enhance its existing PRoW network; the narrative's phrase "protect where possible" cannot be treated as optional. Bridleway 5 and FPs 8, 10, 22 form a legally established access structure that if the development goes ahead should be upgraded to multi-user route (MUR) and connected to create a circular, off-road movement loop. This is required by NPPF 92, 104,112, the Essex Design Guide, and ROWIP focus on continuous, safe PRoW integration. A circular MUR would improve safety for walkers, cyclists, and horse riders, act as a fire-break corridor, and fully integrate green space into a coherent network.	Object	The Council notes the range of concerns raised in respect of Policy SAH10, including issues relating to highways and traffic congestion, infrastructure capacity (particularly education and healthcare provision), landscape impact, heritage considerations, and the suitability of the site for development. Following the Preferred Options (Regulation 18) consultation and further engagement with Essex County Council (ECC) as the Local Education Authority, the Council has reviewed the suitability and deliverability of the proposed allocations at Thorpe-le-Soken. ECC has advised that the cumulative scale of development previously proposed in the village would place significant pressure on primary school provision, particularly at Rolph CE Primary School, where expansion is constrained and capacity issues are unlikely to be resolved locally. In light of these constraints, the Council has concluded that the level of growth previously proposed for Thorpe-le-Soken is not sustainable in education terms without either a substantial increase in development to support a new school or a significant reduction in housing numbers. Having considered these options, the Council has taken the decision to reduce the level of development. As a result, Site Allocation SAH10 (Land south of Colchester Road) has been removed from the Local Plan, and the scale of development at SAH11 has been reduced. This approach results in a substantial reduction in overall housing numbers in Thorpe-le-Soken and responds directly to the concerns raised by ECC and the local community regarding infrastructure capacity, including education provision. The Council also recognises that many representations raised concerns regarding traffic congestion, road safety, landscape impact, and pressure on community services. While these matters have been considered through the evidence base, the reduction in the overall scale of development is also expected to help alleviate these wider pressures. The revised approach ensures that development proposed for Thorpe-le-Soken is more closely aligned with the village's infrastructure capacity and environmental constraints, while continuing to support an appropriate level of growth in accordance with the Local Plan strategy.
823	13578	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. "f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network." Through the Education Scenario Test conducted in January 2026, ECC concluded that the level of development proposed around Thorpe-le-Soken would likely lead to pressure on primary school places that cannot be met locally, due to expansion constraints at Rolph CE Primary. These combined allocations are, therefore, not sustainable in primary education terms. The policies mention	Comment	

			potential education 'provision' rather than financial contributions. As well as additional places at schools in other areas, transport to these schools could be required.		
Businesses, Landowners and Developers					
705	4115	Mr Peter Le Grys [705]	This is the most inappropriate site proposed in the plan. The Council must examine the recent appeal decision in relation to just 5 dwellings, wherein the Inspector considered that the site is not a suitable location for residential development…is within an important and vulnerable gap in the transition from the built form of Thorpe-le-Soken and the surrounding countryside. This carries substantial weight. Would amount to an unplanned advance of urbanisation into open countryside which would be detrimental to the character and appearance of the landscape in this location.	Object	The Council notes the range of concerns raised in respect of Policy SAH10, including issues relating to highways and traffic congestion, infrastructure capacity (particularly education and healthcare provision), landscape impact, heritage considerations, and the suitability of the site for development. Following the Preferred Options (Regulation 18) consultation and further engagement with Essex County Council (ECC) as the Local Education Authority, the Council has reviewed the suitability and deliverability of the proposed allocations at Thorpe-le-Soken. ECC has advised that the cumulative scale of development previously proposed in the village would place significant pressure on primary school provision, particularly at Rolph CE Primary School, where expansion is constrained and capacity issues are unlikely to be resolved locally. In light of these constraints, the Council has concluded that the level of growth previously proposed for Thorpe-le-Soken is not sustainable in education terms without either a substantial increase in development to support a new school or a significant reduction in housing numbers. Having considered these options, the Council has taken the decision to reduce the level of development. As a result, Site Allocation SAH10 (Land south of Colchester Road) has been removed from the Local Plan, and the scale of development at SAH11 has been reduced. This approach results in a substantial reduction in overall housing numbers in Thorpe-le-Soken and responds directly to the concerns raised by ECC and the local community regarding infrastructure capacity, including education provision. The Council also recognises that many representations raised concerns regarding traffic congestion, road safety, landscape impact, and pressure on community services. While these matters have been considered through the evidence base, the reduction in the overall scale of development is also expected to help alleviate these wider pressures. The revised approach ensures that development proposed for Thorpe-le-Soken is more closely aligned with the village's infrastructure capacity and environmental constraints, while continuing to support an appropriate level of growth in accordance with the Local Plan strategy.
1660	13666	Harding Investment Ltd. [1660]	This representation is submitted by Ceres Property on behalf of our client Harding Investment Ltd. in relation to Tendring District Council's ("the Council") Regulation 18 Preferred Options consultation. The representation relates to a site north of Thorpe-le-Soken railway station, within an agricultural field west of Station Road ("the Site"). The Site comprises approximately 1.38 hectares of land and can be identified on the accompanying Location Plan. The site has potential for a highly sustainable development of approximately 30 units on land that is not suited to agricultural production. Submitted with this representation are: • FRNT025-715-CAO –P01 Constraint and Opportunity Plan • Information from the farmer on agricultural potential (See attached documents)	Comment	
441	14252	Richborough [441]	The proposed allocation of land south of Colchester Road confirms the Council's agreement that it is a suitable opportunity Road to deliver sustainable new development in Tendring in support of the DLPs objectives. It establishes that the principle of development here is considered suitable, and that growth can be accommodated without undue harm on the existing settlement, subject to the requirements set out in the associated policy. Richborough therefore consider that this opportunity could be realised further, and the allocation increased to deliver an extent of housing which could better guarantee the delivery of meaningful supporting infrastructure which would not only directly mitigate the proposed new development, but provide improvements for existing local residents and users of the Rural Service Centre. The additional land is sustainable, directly adjacent to the settlement boundary as currently proposed in the DLP, and has the potential to make a significant contribution of much needed market and affordable housing, along with supporting infrastructure.	Comment	
Community Representatives					
953	3549	Mr Community	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950.	Comment	The Council notes the range of concerns raised in respect of Policy SAH10, including issues relating to highways and traffic congestion, infrastructure

		Campaigner David Barton [953]	See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.		capacity (particularly education and healthcare provision), landscape impact, heritage considerations, and the suitability of the site for development. Following the Preferred Options (Regulation 18) consultation and further engagement with Essex County Council (ECC) as the Local Education Authority, the Council has reviewed the suitability and deliverability of the proposed allocations at Thorpe-le-Soken. ECC has advised that the cumulative scale of development previously proposed in the village would place significant pressure on primary school provision, particularly at Rolph CE Primary School, where expansion is constrained and capacity issues are unlikely to be resolved locally. In light of these constraints, the Council has concluded that the level of growth previously proposed for Thorpe-le-Soken is not sustainable in education terms without either a substantial increase in development to support a new school or a significant reduction in housing numbers. Having considered these options, the Council has taken the decision to reduce the level of development. As a result, Site Allocation SAH10 (Land south of Colchester Road) has been removed from the Local Plan, and the scale of development at SAH11 has been reduced. This approach results in a substantial reduction in overall housing numbers in Thorpe-le-Soken and responds directly to the concerns raised by ECC and the local community regarding infrastructure capacity, including education provision. The Council also recognises that many representations raised concerns regarding traffic congestion, road safety, landscape impact, and pressure on community services. While these matters have been considered through the evidence base, the reduction in the overall scale of development is also expected to help alleviate these wider pressures. The revised approach ensures that development proposed for Thorpe-le-Soken is more closely aligned with the village's infrastructure capacity and environmental constraints, while continuing to support an appropriate level of growth in accordance with the Local Plan strategy.
276	4496	Thorpe-le-Soken Parish Council (Jessica Ball, Clerk) [276]	This site is within walking distance of the High Street. This location makes better use of the road network to the west of Thorpe, avoiding adding to the already overburdened narrow roads through the village centre. There is no capacity for the primary school provision within the village to increase, the road network servicing this site provides direct routes to the primary provisions being created in the neighbouring village of Weeley as part of the current development on Thorpe Road, as well as those that will be created as part of the Weeley Garden Village proposals within this emerging plan. I was unable to make a comment about point F of the access and movement section of the policy for a connection point at the south eastern part of the site for a future spine link road to Station Road. During our meeting with you (Gary) on the 5th Feb the parish council expressed their concerns regarding this element of the policy and how this may encourage development on land between the spine road and the current village settlement boundary. You suggested at the time that we should request to have it taken out I our consultation responses and that it shouldn't be a problem to have it taken out of the plan. However, as mentioned above I was unable to do this due to the word limit and our focus being on supportive arguments for this site (land south of Colchester Road) to be included in the emerging plan in light of the Lifehouse informing us that they would be objecting to it!	Support	
Members of the Public					
1033	3689	Mrs Kim Shaw [1033]	*This site leads out onto an extremely busy main road which goes through the village to Frinton and Walton-on-the-Naze. In Summer there is already frequent tourist gridlock. Congestion and road deterioration is further exacerbated by lack of parking in the village. Driving up the High Street means contesting with parked cars and large lorries coming from Harwich etc. * No infrastructure supports these houses: schools are full and there are no doctor's appointments. * Your own document: "Tendring has the highest proportion of	Comment	The Council notes the range of concerns raised in respect of Policy SAH10, including issues relating to highways and traffic congestion, infrastructure capacity (particularly education and healthcare provision), landscape impact, heritage considerations, and the suitability of the site for development. Following the Preferred Options (Regulation 18) consultation and further engagement with Essex County Council (ECC) as the Local Education Authority, the Council has reviewed the suitability and deliverability of the proposed allocations at Thorpe-le-Soken. ECC has advised that the cumulative scale of development previously proposed in the village would

			households without access to natural green space in Essex" and "the lowest life expectancies". Why worsen it?		place significant pressure on primary school provision, particularly at Rolph CE Primary School, where expansion is constrained and capacity issues are unlikely to be resolved locally. In light of these constraints, the Council has concluded that the level of growth previously proposed for Thorpe-le-Soken is not sustainable in education terms without either a substantial increase in development to support a new school or a significant reduction in housing numbers. Having considered these options, the Council has taken the decision to reduce the level of development. As a result, Site Allocation SAH10 (Land south of Colchester Road) has been removed from the Local Plan, and the scale of development at SAH11 has been reduced. This approach results in a substantial reduction in overall housing numbers in Thorpe-le-Soken and responds directly to the concerns raised by ECC and the local community regarding infrastructure capacity, including education provision. The Council also recognises that many representations raised concerns regarding traffic congestion, road safety, landscape impact, and pressure on community services. While these matters have been considered through the evidence base, the reduction in the overall scale of development is also expected to help alleviate these wider pressures. The revised approach ensures that development proposed for Thorpe-le-Soken is more closely aligned with the village's infrastructure capacity and environmental constraints, while continuing to support an appropriate level of growth in accordance with the Local Plan strategy.
581	4164	Mrs Sally Webb [581]	Farm land again. The traffic flow in Thorpe is huge and should not be added to by extra development.	Object	
353	4350	Mr Robert Pomery [353]	Allocating Thorpe Green for housing is unsustainable and inferior to the Station Road site near the railway station. It conflicts with planning policy promoting development near transport hubs and was chosen for political rather than professional planning reasons. Thorpe Green would harm landscape character, cause settlement coalescence, and lacks proper assessment. The site also faces significant technical and financial challenges, including costly access and drainage infrastructure, raising doubts about deliverability. While Station Road has limitations, it could still support fewer homes with less impact and better access to transport and local services, making it a more sustainable option.	Object	
1443	4435	Mr Adrian Bowles [1443]	No notification letter was received by affected properties. The site lies within the 'Holland Basin' conservation area, where development should be restricted. Access onto the busy main road will worsen congestion in an already choked village, particularly in summer. Local amenities, including the GP surgery, schools, pavements and lighting, are already inadequate. Previous applications on adjacent land have been refused. "Infill" used in the planning application is another word for urban sprawl. Loss of farmland raises food security concerns, and residents who bought homes facing protected land now face its loss, despite clear local opposition.	Object	
1244	13711	Ruth Layzell [1244]	Thorpe Le Soken high street, if the proposed housing plans go ahead around us it will be impossible for any emergencies services to gain access. We are a bottle neck here and the road is already saturated with cars and heavy lorries. This will become an impossible situation our road can't take anymore traffic which will come with all this extra proposed housing development. We already have the cabling issue being laid soon. The situation will become untenable.	Object	
1097	13849	Mr Matthew Dilley [1097]	Having read recently in the thorpe le soken village magazine to have my say on your ridiculous planning policy I am writing this email to voice my concerns . The land South of Colchester road thorpe le soken that has been turned down for planning permission several times for all the right reasons by your planning department is suddenly in your local plan review 2025-2042. Tell me how does this make any sense ? What as changed other than the fact that we now have a government elected with only 30% of the people's vote who everyone knows will be gone in 2029. Are you really going to destroy thorpe le soken permanently. for some pie in sky housing scene that is unachievable. Please read again through all the reasons this was refused several times by your own planning officers . Very intelligent valid reasons do not ignore	Comment	
1105	13947	Mrs Sue Mclauchlan [1105]	Objection due to serious safety, infrastructure and community impacts. Frinton Road is the only through route and already unsafe, with limited pavements, no crossings, and severe congestion that routinely brings the area to a standstill, delaying emergency services. Drainage and sewers are at capacity, roads are deteriorating, and	Object	

			utilities are unreliable amid ongoing works. Local GP services are overstretched and further growth would worsen access to care. The development would also destroy valued wildlife habitats and green space. Thorpe is already over-populated, and additional large-scale development would irreversibly damage the village's safety, infrastructure, character and quality of life.		
1443	13959	Mr Adrian Bowles [1443]	Objection to the proposed development within the Holland Basin Conservation Area, where boundaries are clearly defined and development should not proceed without a lawful change of use. The site's access onto a busy main road would worsen congestion in an already crowded village centre, particularly during summer months. Local amenities, including GP services, schools, pavements and lighting, are already inadequate and further housing would exacerbate these shortcomings. Previous planning applications on nearby land have been refused, raising questions about what has materially changed. The proposal risks urban sprawl, loss of valuable agricultural land, and undermines trust in conservation protections that residents relied upon when purchasing their homes.	Object	
756	14390	Mr Mark Sangwine [756]	Issues and Actions to be addressed with regard to SAH10 and SAH11: Publish site-specific TA for SAH10 and SAH11 as Assessment part of evidence base Model combined impact of 260 dwellings on village road network Publish feasibility study or evidence that roads can absorb 260 homes SAH11 Access Via Residential Streets, ECC Highways to confirm suitability of Lady Nelson Gardens in writing ECC to confirm Rolph Primary capacity; IDP to commit funded expansion ICB to confirm surgery capacity; IDP to commit funded provision Publish evidence base for proportionality Proportionate assessment Publish Heritage Impact Assessment; obtain Historic England view on SAH11 Address IDP's own RED school rating and AMBER AMBER Wastewater wastewater rating for Thorpe-le-Soken Amend SAH10 to require spine road by defined phasing trigger Publish capacity assessment of Thorpe Maltings site with regard to Sequential Testing and Brownfield sites.	Comment	

			Obtain and publish Anglian Water capacity confirmation		

Policy SAH10: Development of Land South of Colchester Road, Thorpe-le-Soken

Summary of Representations
Site SAH10 has been removed from the Local Plan following Regulation 18 consultation due to identified primary school capacity constraints in Thorpe-le-Soken. The overall level of growth in the village has been significantly reduced to align with infrastructure capacity and address community concerns.

Policy SAH11: Development of Land North of Lifehouse Spa & Hotel, Thorpe-le-Soken

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
823	13579	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The requirement for 20% Biodiversity Net Gain (BNG) and the expectation that development must support the Essex LNRS priority habitat measures identified in the Strategic Opportunities map is welcomed. It is noted that only Policies SAH7, SAH10 and SAH11 (criteria f/g) reference the integration of GI with the wider countryside and promote active travel through improved links to surrounding settlements. In which all the policies could incorporate, even if it just promotes active travel and connects to surrounding settlements. Across all the policies, the relevant criteria (f/h/i) focus solely on the retention and enhancement of ecological or amenity features, which is supported. Expanding this wording to include Green and Blue Infrastructure (GBI) would strengthen alignment with Policies PPL4 and PPL4a, support delivery of LNRS priorities, and better reflect the landscape led, multifunctional GI vision articulated throughout the Local Plan.-led, multifunctional GI vision articulated throughout the Local Plan. Suggested additional wording. “f/h/i. The layout and design must retain and enhance existing site features of ecological or amenity value. Where such features are present, the applicant must follow a hierarchy of avoidance, mitigation, and compensation for any adverse impacts; ensuring that opportunities are taken to reinforce and integrate these assets into a multi-functional GBI network.” The policies mention potential education ‘provision’ rather than financial contributions. As well as additional places at schools in other areas, transport to these schools could be required.	Comment	The Council welcomes Essex County Council’s support for the biodiversity requirements of the policy. Policy SAH11 will be amended to strengthen references to multifunctional Green and Blue Infrastructure, support the priorities of the Essex Local Nature Recovery Strategy, and promote active travel and improved connectivity to the wider countryside, surrounding settlements and local services. The policy’s infrastructure requirements have been reviewed and updated to require development to deliver any site-specific infrastructure requirements and contributions identified in the Infrastructure Delivery Plan, which may include education provision; ,healthcare and emergency services contributions; Essex Coast RAMS and environmental mitigations; highways, public transport and active travel improvements;, water, and wastewater and sustainable drainage infrastructure, and connection to services and utilities; and community and/or open space facilities.
Businesses, Landowners and Developers					
Community Representatives					
953	3550	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					

1033	3688	Mrs Kim Shaw [1033]	*This site leads out onto an extremely busy main road to Frinton and Walton-on-the-Naze. Quite apart from adding to congestion and road deterioration, it will not allow "safe pedestrian and cycle connections" to the station, half an hour's walk away. * There is no infrastructure to support these houses: schools are full and it is already impossible to get a doctor's appointment. * This area is a haven for a wide range of wildlife: foxes, badgers, bats and birds. Britain is the most nature-depleted country in Europe: do we really need to make it worse?	Comment	This comment is noted. The Council understands concerns with regard to the traffic near site SAH11. Transport modelling has been updated to inform on where additional roads and transportation infrastructure are needed to support development. This will include pedestrian and cycle connections. The Council has also updated its Infrastructure Delivery Plan (IDP), which sets out the required infrastructure, such as schools, surgeries, and other facilities, needed here to support growth. The Council will continue to work with the relevant infrastructure providers to deliver the appropriate services and facilities.
353	4352	Mr Robert Pomery [353]	The respondents support housing allocation SAH11 but propose extending the boundary to increase delivery. Current proposals total 70 homes versus the planned 110; the extension could deliver about 105. The site has suitable access, good pedestrian links to the railway station, and is visually contained with minimal landscape impact. Development would reflect local character and retain key landscape features. Heritage impacts are limited, but Policy SAH11 criterion j should be amended to require regard to, not enhancement of, nearby assets. The 20% biodiversity net gain target is considered unjustified without evidence of need or deliverability.	Support	The Council acknowledges this representation. Officers have provisionally recommended the site's indicative dwelling numbers be reduced from 110 to 70. However, the Council will not be reducing the 20% biodiversity net gain target for the site. Viability has been taken into account in the preparation of the Local Plan and has informed consideration of its site allocations and policy requirements. The Council has considered the likely costs and requirements arising from relevant policies, including infrastructure, affordable housing, design, environmental mitigation and other planning obligations, in assessing whether the Plan is deliverable. Viability has also been assessed on a cumulative basis, recognising that development proposals will need to respond to the combined effect of Local Plan policies rather than individual requirements in isolation. This approach helps to ensure that the policies, when read together, are realistic, proportionate and capable of supporting sustainable development across the plan period.
1244	13712	Ruth Layzell [1244]	Thorpe Le Soken high street, if the proposed housing plans go ahead around us it will be impossible for any emergencies services to gain access. We are a bottle neck here and the road is already saturated with cars and heavy lorries. This will become an impossible situation our road can't take anymore traffic which will come with all this extra proposed housing development. We already have the cabling issue being laid soon. The situation will become untenable.	Object	The Council acknowledges concerns regarding traffic congestion, highway capacity and access for emergency vehicles. These matters have been considered through the site assessment process and will be subject to detailed transport assessment and consultation with Essex Highways. Appropriate mitigation measures will be secured where necessary through the planning application process. The Council remains satisfied that the allocation represents a suitable and sustainable location for growth.
1105	13949	Mrs Sue Mclauchlan [1105]	Objection due to serious safety, infrastructure and community impacts. Frinton Road is the only through route and already unsafe, with limited pavements, no crossings, and severe congestion that routinely brings the area to a standstill, delaying emergency services. Drainage and sewers are at capacity, roads are deteriorating, and utilities are unreliable amid ongoing works. Local GP services are overstretched and further growth would worsen access to care. The development would also destroy valued wildlife habitats and green space. Thorpe is already over-populated, and additional large-scale development would irreversibly damage the village's safety, infrastructure, character and quality of life.	Object	The Council acknowledges concerns regarding highways, infrastructure capacity, drainage, utilities, healthcare provision, biodiversity and village character. These matters have informed the site selection process and are addressed through the Infrastructure Delivery Plan, policy requirements and the planning application process. Appropriate infrastructure contributions and mitigation measures will be secured where necessary. The Council considers the allocation capable of being delivered in a sustainable manner.

756	14391	Mr Mark Sangwine [756]	Summary: Issues and Actions to be addressed with regard to SAH10 and SAH1: Publish site-specific TA for SAH10 and SAH11 as Assessment part of evidence base Model combined impact of 260 dwellings on village road network Publish feasibility study or evidence that roads can absorb 260 homes SAH11 Access Via Residential Streets, ECC Highways to confirm suitability of Lady Nelson Gardens in writing ECC to confirm Rolph Primary capacity; IDP to commit funded expansion ICB to confirm surgery capacity; IDP to commit funded provision Publish evidence base for proportionality Proportionate assessment Publish Heritage Impact Assessment; obtain Historic England view on SAH11 Address IDP's own RED school rating and AMBER AMBER Wastewater wastewater rating for Thorpe-le-Soken Amend SAH10 to require spine road by defined phasing trigger Publish capacity assessment of Thorpe Maltings site with regard to Sequential Testing and Brownfield sites. Obtain and publish Anglian Water capacity confirmation	Comment	The Council acknowledges the comments regarding transport modelling, infrastructure capacity, education, healthcare, wastewater, heritage and alternative sites. The allocation has been informed by the Local Plan evidence base, including infrastructure assessments and site evaluation work. Detailed matters relating to highways, access arrangements, infrastructure provision, heritage impacts and utility capacity will be assessed through the planning application process in consultation with the relevant statutory bodies and infrastructure providers. The Council considers the allocation justified and supported by proportionate evidence appropriate to the Local Plan stage.

Policy SAH11: Development of Land North of Lifehouse Spa & Hotel, Thorpe-le-Soken

Summary of Representations

Representations on Policy SAH11 focused primarily on biodiversity and ecological enhancement, Green and Blue Infrastructure, active travel connectivity, infrastructure capacity, highway impacts, healthcare and education provision, utility capacity, heritage considerations and the suitability and scale of development. Essex County Council supported the biodiversity requirements of the policy but sought stronger references to Green and Blue Infrastructure, active travel and Essex Local Nature Recovery Strategy priorities, together with clarification around education infrastructure contributions. Public representations raised concerns regarding traffic congestion, emergency access, pressure on local infrastructure, healthcare, schools, wastewater capacity and the cumulative effects of growth in Thorpe-le-Soken. Support was received for the allocation, including suggestions to extend the site boundary and reduce biodiversity net gain requirements. The Council concluded that the allocation remains a suitable and sustainable location for growth, supported by the Local Plan evidence base, Infrastructure Delivery Plan and policy framework, with impacts capable of being appropriately mitigated through planning obligations and the development management process.

In response to the representations submitted, changes have been made to the wording of Policy SAH11, and the indicative capacity of the allocation was reviewed and reduced from 110 dwellings to 70 dwellings. The policy was amended to strengthen references to multifunctional Green and Blue Infrastructure, and the wording was strengthened to place greater emphasis on the retention, enhancement and integration of ecological and amenity features within a multifunctional Green and Blue Infrastructure network. Further to this, the policy was updated to better align with Policies PPL4 and PPL4a and support delivery of priorities identified within the Essex Local Nature Recovery Strategy. Additional policy wording was incorporated to promote active travel and improve connectivity to the wider countryside, surrounding settlements and local services. The infrastructure requirements of the policy were also reviewed to ensure that references to education infrastructure appropriately reflected both physical provision and financial contributions where required. However, no changes were made to reduce the requirement for 20%

Biodiversity Net Gain, as the Council concluded that the requirement is justified by the evidence base, has been subject to viability testing and is applied consistently across the strategic allocations. No changes were made to extend the allocation boundary, as the Council considered the allocation appropriate in scale and extent. No substantive changes were made in response to concerns regarding highways, emergency access, infrastructure capacity, healthcare, education, wastewater, heritage or utility provision, as the Council concluded that these matters are addressed through the Local Plan evidence base, Infrastructure Delivery Plan, policy framework and planning application process. Additionally, no changes were made in response to requests for additional transport, heritage or infrastructure evidence, as the Council considered the evidence supporting the allocation proportionate and appropriate for the Local Plan stage.

Policy SAE1: Carless Extension, Harwich

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
148	14524	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Strategic Allocation for Employment contains areas of the site at medium and high risk of flooding from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	Noted. The Council acknowledges the Environment Agency's comments and will continue to ensure that flood risk considerations are informed by the latest evidence base, including the SFRA and any necessary site-specific assessments. The Council considers that existing Local Plan policies and supporting evidence provide an appropriate framework to address flood risk, environmental considerations and other planning matters through the development management process. The allocation remains an important component of the District's employment land strategy and is considered justified, deliverable and consistent with the overall spatial strategy.
Businesses, Landowners and Developers					
Community Representatives					
953	3551	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					
581	4176	Mrs Sally Webb [581]	sensible	Support	This is noted and the support is welcomed.

Policy SAE1: Carless Extension, Harwich

Summary of Representations

Representations on Policy SAE1 primarily related to flood risk, environmental considerations and the suitability of the allocation for continued employment use. The Environment Agency highlighted the need for the latest flood risk evidence to inform future development proposals and recommended that matters such as climate change, flood hazards and site-specific mitigation be considered through the planning process. Other comments raised general environmental and heritage considerations, whilst support was also expressed for the allocation's role in supporting economic growth and investment in Harwich.

The Council has carefully considered the representations received and notes the importance of ensuring that flood risk and environmental matters are addressed through the latest evidence base and development management process. The Council remains satisfied that the existing policy framework provides an appropriate mechanism for addressing these issues and that the allocation continues to represent a justified and deliverable employment opportunity within the District's economic strategy. Having considered all comments received, no changes are proposed to the existing adopted Policy SAE1.

Policy SAE2: Freeport East, Bathside Bay and the A120 Corridor

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
823	13560	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	SAE2 (Freeport East, Bathside Bay and the A120 corridor: SAE2 (Freeport East, Bathside Bay and the A120 corridor) is strongly supported by the transport priorities identified in the Freeport East Transport Masterplan (2025), which highlights the need for a coordinated package of strategic and local interventions. These include A120 corridor capacity and safety enhancements to improve access to Harwich International Port, resilience and capacity upgrades on the A14/A12 hinterland routes (including the Copdock Interchange and Orwell Bridge), and major rail freight improvements s as the Ely and Haughley upgrades and Felixstowe branch electrification to enable modal shift and unlock additional port capacity. Locally, delivery of Bathside Bay requires improved port access, junction upgrades, and active travel connections, including the Bathside Bay Green Access Corridor, alongside strengthened workforce accessibility through enhanced bus, DRT and rail services (e.g. increased Colchester–Clacton frequencies) and potential expansion of the Harwich Felixstowe foot ferry.	Comment	The Council welcomes Essex County Council's support for Policy SAE2 and notes the importance of the strategic transport interventions identified within the Freeport East Transport Masterplan. The Council recognises that the successful delivery of Freeport East, Bathside Bay and associated employment growth along the A120 corridor will require coordinated investment in port, highway, rail and sustainable transport infrastructure. The policy provides an appropriate strategic framework to support these objectives, whilst detailed infrastructure requirements and delivery mechanisms will continue to be considered through the Infrastructure Delivery Plan, ongoing partnership working, and the development management process.
826	14503	Essex Wildlife Trust (Annie Gordon) [826]	We note the Council's support for employment growth along the A120 corridor in the context of Freeport East. The Bathside Bay container terminal allocation (SAE2) has already received planning permission, but we are concerned about the plan's endorsement of wide-ranging further A120 corridor employment growth without an adequate cumulative ecological assessment. The HRA Screening Report identifies SAE2 and SAE3 as screened in for AA. We request that the cumulative ecological impact of Freeport East, the Collierswood Farm Business Park, road widening and junction improvements, and the associated residential growth in the northern District is assessed holistically in the AA, with particular attention to air quality impacts on estuarine Habitats sites from increased HGV and road traffic movements.	Comment	The Council notes the concerns regarding the potential cumulative ecological impacts associated with Freeport East, Bathside Bay, associated employment growth and related infrastructure improvements. The emerging Local Plan is supported by a Habitats Regulations Assessment (HRA) which will consider the effects of proposed allocations both individually and cumulatively. The Appropriate Assessment process will consider potential impacts on designated habitats, including effects arising from increased traffic movements and associated air quality impacts. Biodiversity Net Gain requirements are addressed through Policy PPL4a and any necessary mitigation measures identified through the HRA process will be incorporated into the Plan and implemented through the development management process. The Council is therefore satisfied that ecological impacts can be appropriately assessed and mitigated in accordance with national policy and legislative requirements.
148	14526	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice	Comment	The Council acknowledges the Environment Agency's comments regarding flood risk and the need for robust Strategic Flood Risk Assessment evidence. The Local Plan is supported by an up-to-date Strategic Flood Risk Assessment (SFRA), and the Council accepts that updated flood modelling and evidence should inform the Sequential Test and, where necessary, the Exception Test. The Council will consider whether Level 2 SFRA assessments are required for areas

			should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Strategic Allocation for Employment contains areas of the site at medium and high risk of flooding from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.		within Flood Zones 2 and 3 or where significant surface water flood risk has been identified. Bathside Bay and associated development proposals have previously been subject to site-specific Flood Risk Assessments through the planning application process. Any future development proposals within the allocation will continue to be required to comply with the National Planning Policy Framework and Strategic Policy PPL1: Development and Flood Risk, ensuring development is directed to the areas of lowest risk where possible and is safe for its lifetime without increasing flood risk elsewhere. The Council considers the policy to be consistent with national flood risk policy and guidance.
Businesses, Landowners and Developers					
1462	4498	Latimer (Tendring Colchester Borders Garden Community) Developments Limited [1462]	Amendments are requested, to align with national policy and guidance in respect of planning obligations, as well as noting that the TCBGC planning application does not have confirmed or agreed obligations at the time of writing.	Object	The Council notes the comments regarding planning obligations and the need for consistency with national policy and guidance. The Council accepts that all planning obligations arising from future development proposals must satisfy the statutory tests of necessity, direct relationship to the development, and fairness and reasonableness in scale and kind. The policy is intended to provide a strategic framework for infrastructure delivery and mitigation rather than prescribe specific obligations. The Council also acknowledges that planning obligations associated with the Tendring Colchester Borders Garden Community are subject to ongoing discussions and have not been finalised. The Council considers the policy to be consistent with national planning policy and no modification is proposed at this stage.
653	14040	Hutchison Ports (UK) Ltd [653]	HPUK endorse Tendring's intention to include BBCT as part of a strategic planning policy. This is a significant, positive change to the development plan where BBCT is referenced albeit not formally allocated. Draft Policy SAE2 contains a significant amount of supporting text which is largely acceptable. There is support for text referencing BBCT's contributions to economic prosperity/regeneration, green energy/sustainability, and the Little Oakley Managed Realignment Site. However, for clarity and the avoidance of doubt the supporting text associated with the New Strategic Policy SAE2 which refers to improvements and upgrades to the A120 should be amended. This is to ensure the responsibility and cost for these associated works is appropriately justified and evidenced as per Paragraph 36 of the NPPF and tests of soundness. (See attached document for proposed wording changed)	Comment	The Council welcomes Hutchison Ports' support for the inclusion of Bathside Bay Container Terminal (BBCT) within Strategic Policy SAE2 and notes the positive comments regarding the policy's recognition of the economic, regeneration, sustainability and environmental benefits associated with the proposal. The Council agrees that BBCT has the potential to make a significant contribution towards economic growth, employment generation and Freeport East objectives. In relation to the comments regarding highway improvements and upgrades to the A120, the Council recognises the importance of ensuring that any infrastructure requirements are appropriately justified, evidenced and consistent with national policy. Bathside Bay Container Port and the temporary Green Energy Hub occupying the site have already been subject to planning applications and associated transport assessments, with highway mitigation measures agreed through those processes. The Council considers it appropriate that the Local Plan continues to recognise the need for strategic transport improvements associated with growth along the A120 corridor, whilst accepting that the extent, responsibility and delivery of any specific mitigation measures will need to be informed by evidence and assessed through the relevant planning and infrastructure delivery processes.
953	3552	Mr Community	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations

		Campaigner David Barton [953]	prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.		within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
Members of the Public					

Policy SAE2: Freeport East, Bathside Bay and the A120 Corridor

Summary of Representations
Representations generally support the strategic objective of Policy SAE2 in promoting economic growth associated with Freeport East, Bathside Bay and the A120 Corridor, whilst raising matters relating to transport infrastructure, planning obligations, ecological impacts and flood risk. Key issues include the delivery of strategic transport improvements, the cumulative environmental effects of growth associated with Freeport East, the need for robust flood risk assessment, and ensuring that any planning obligations or infrastructure requirements are justified and consistent with national policy.

The Council supports the continued inclusion of Policy SAE2 and considers it provides an appropriate strategic framework for the delivery of Freeport East and Bathside Bay. Bathside Bay Container Port and the temporary Green Energy Hub have previously been subject to planning applications, including the assessment of transport impacts and associated highway mitigation measures. Biodiversity Net Gain requirements are addressed through Policy PPL4a, whilst the Habitats Regulations Assessment will consider cumulative effects arising from proposed development and infrastructure improvements. Flood risk matters are addressed through the Strategic Flood Risk Assessment and Policy PPL1: Development and Flood Risk, with future proposals required to demonstrate compliance with national policy. The Council also recognises that any planning obligations or infrastructure contributions secured through future planning permissions must meet the relevant statutory and policy tests of necessity, proportionality and direct relationship to the development. No substantive modifications to the policy are proposed at this stage

Policy SAE3: Collierswood Farm A120 Strategic Business Park

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
823	13581	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	ECC welcome the design and development principle set out in Policy SAE3, including the landscape led approach, the creation of multifunctional GI, the requirement for a 20% biodiversity net gain, landscape buffer, the incorporation of green roofs, and the clear alignment with the Essex Local Nature Recovery Strategy (LNRS), particularly the woodland habitat priorities identified for the site. These elements set a positive model for environmentally responsible employment development. To ensure consistency across all strategic employment policies, the same emphasis on GI, LNRS alignment, and nature-based design should also be reflected in Policies SAE1 and SAE2, helping to secure a coherent, high-quality GI network and maximise environmental, visual and climate resilience benefits. Led approach, the creation of multifunctional GI, the requirement for a 20% biodiversity net gain, landscape buffer, the incorporation of green roofs, and the clear alignment with the Essex Local Nature Recovery Strategy (LNRS), particularly the woodland habitat priorities identified for the site. These elements set a positive model for environmentally responsible employment development. To ensure consistency across all strategic employment policies, the same emphasis on GI, LNRS alignment, and nature-based design should also be reflected in Policies SAE1 and SAE2, helping to secure a coherent, high quality GI network and maximise environmental, visual and climate resilience benefits.-led approach, the creation of multifunctional GI, the requirement for a 20% biodiversity net gain, landscape buffer, the incorporation of green roofs, and the clear alignment with the Essex Local Nature Recovery Strategy (LNRS), particularly the woodland habitat priorities identified for the site. These elements set a positive model for environmentally responsible employment development. To ensure consistency across all strategic employment policies, the same emphasis on GI, LNRS alignment, and nature-based design should also be reflected in Policies SAE1 and SAE2, helping to secure a coherent, high-quality GI network and maximise environmental, visual and climate resilience benefits.	Comment	The Council welcomes Essex County Council's support for the design and development principles in Policy SAE3, including the landscape-led approach, multifunctional green and blue infrastructure, biodiversity net gain, landscape buffering, green roofs and alignment with the Essex Local Nature Recovery Strategy. The Council agrees that these matters provide a positive framework for environmentally responsible employment development at this site. In relation to the request for similar wording in Policies SAE1 and SAE2, the Council considers that Policy PPL4 already provides a strategic framework requiring development to protect, enhance and connect green and blue infrastructure, maximise opportunities identified through the Essex LNRS, and secure biodiversity enhancement and net gain. Policy PPL4a also addresses biodiversity net gain. Given the particular characteristics of SAE1 and SAE2, and the fact that SAE2 provides a broader strategic framework for Bathside Bay, Freeport East and the A120 corridor rather than allocating specific A120 corridor sites, the Council considers that the strategic policies provide sufficient guidance without duplicating detailed SAE3 wording in those policies.

			Potential additional wording to Policies SAE1 and SAE2 “Development must follow a landscape led approach that delivers a multifunctional GBI network, achieves BNG, and supports habitat priorities in the Essex LNRS led approach that delivers a multifunctional GBI network, achieves BNG, and supports habitat priorities in the Essex LNRS		
826	14504	Essex Wildlife Trust (Annie Gordon) [826]	We note the Council's support for employment growth along the A120 corridor in the context of Freeport East. The Bathside Bay container terminal allocation (SAE2) has already received planning permission, but we are concerned about the plan's endorsement of wide-ranging further A120 corridor employment growth without an adequate cumulative ecological assessment. The HRA Screening Report identifies SAE2 and SAE3 as screened in for AA. We request that the cumulative ecological impact of Freeport East, the Collierswood Farm Business Park, road widening and junction improvements, and the associated residential growth in the northern District is assessed holistically in the AA, with particular attention to air quality impacts on estuarine Habitats sites from increased HGV and road traffic movements.	Comment	The Council notes the concerns regarding the potential cumulative ecological impacts associated with Freeport East, Bathside Bay, the Collierswood Farm Business Park, road widening, junction improvements and associated residential growth in the northern part of the District. The emerging Local Plan is supported by a Habitats Regulations Assessment which will consider the effects of proposed allocations both individually and cumulatively. The Appropriate Assessment process will consider potential impacts on designated habitats, including effects arising from increased HGV and road traffic movements and associated air quality impacts. Biodiversity net gain requirements are addressed through Policy PPL4a, and any necessary mitigation identified through the HRA process will be incorporated into the Plan and implemented through the development management process. The Council is therefore satisfied that ecological impacts can be appropriately assessed and mitigated in accordance with national policy and legislative requirements.
Businesses, Landowners and Developers					
1700	14546	The Churchmanor Estates Company	We support these representations with a series of plans illustrating the site boundary, its relationship to the Garden Community, its regional context, and proposed access arrangements. Drawing on over 35 years of experience delivering strategic business parks, we consider the A120 corridor critical to Tendring’s growth. With rising housing targets, significant new employment land is needed. We believe this site—over 65ha, well-connected and deliverable—offers the best opportunity to meet demand. It would attract investment, support infrastructure delivery, complement the Garden Community, and drive economic growth across Tendring and the wider sub-region.	Support	This is noted and the support is welcomed.
1462	4495	Latimer (Tendring Colchester Borders Garden Community) Developments Limited [1462]	Latimer has no objection, in principle, to a strategic business park allocation in this location, however, would want to be assured through the allocation that there would be no detrimental impact on the TCBGC and that the allocation proportionally contributes to the proposed infrastructure (i.e. Phase 2 of the A1331 Link Road infrastructure project), which allocation SAE3 is wholly dependent on for access and egress, with no other access/egress being possible or permissible for the allocation. Accordingly, we have suggested amended wording.	Object	The Council notes that Latimer has no objection in principle to a strategic business park allocation in this location and acknowledges the comments regarding potential impacts on the Tendring Colchester Borders Garden Community and infrastructure contributions, including Phase 2 of the A1331 Link Road. The Council accepts that any planning obligations associated with SAE3 must satisfy the statutory tests of being necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. The Garden Community has been progressed through a site-specific Development Plan Document and is now at planning application stage, while SAE3 is at an earlier stage of planning. Any contributions from SAE3 will therefore be considered having regard to the specific impacts, timing and infrastructure requirements of the business park itself, and not as a substitute for obligations directly related to the Garden Community.

1713	13676	City & Country [1713]	Policy SAE3 Collierswood Farm A120 Strategic Business Park, allocates Land north of the A120 in Elmstead Market for a Strategic Business Park of sub-regional significance. The business park is located adjacent to the north of the TCBGC. The delivery of a 78 hectare business park is situated in a very sustainable location, with ease of access to Colchester to the east and Ipswich to the north. It will promote substantial employment growth in Tendring and provide a site that is easy to access for residents from across Tendring. This will promote inward investment within the district, and it is also likely to assist in reducing travel time to work. The business park will also result in the sustainability of villages such as Bromley Cross, Ardleigh and Elmstead Market being improved having regard to their proximity to extensive new jobs and employment opportunities. Policy SAE3 is considered to be justified, positively prepared and in accordance with national policy and therefore sound in planning terms.	Support	This is noted and the support is welcomed.
Community Representatives					
953	3553	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
244	13638	Ardleigh Parish Council (Ardleigh Parish) [244]	Alternative Approach to Employment The Parish Council supports: • Smaller-scale, high-quality employment development • Focus on technology, research, and professional services • Higher job density and better alignment with local workforce needs Request: • Reduce the scale of the allocation • Prioritise high-value employment sectors over logistics	Object	The Council notes the Parish Council's support for smaller-scale, high-quality employment development, including technology, research and professional services, and its request to reduce the scale of the allocation and prioritise higher-value employment sectors over logistics. The Local Plan is informed by the Employment Land Review and seeks to provide a balanced range of employment sites across the District on both a quantitative and qualitative basis. While the Council recognises the importance of higher-value and smaller-scale employment opportunities, it also considers that a range of site types and employment uses is necessary to meet identified needs, support economic growth and provide market choice and flexibility. This is particularly important in responding to the high-growth policy-on scenario identified in the Employment Land Review.
Members of the Public					
581	4177	Mrs Sally Webb [581]	Supporting for employment reasons	Support	This is noted and the support is welcomed.

Policy SAE3: Collierswood Farm A120 Strategic Business Park

Summary of Representations
Representations generally supported the principle of SAE3 as a strategic business park, recognising its potential to deliver jobs, attract investment and support economic growth along the A120 corridor. However, some respondents raised concerns regarding cumulative ecological impacts, infrastructure requirements, the relationship with the Tendring Colchester Borders Garden Community, and whether a greater emphasis should be placed on smaller-scale, higher-value employment sectors. Stakeholders also welcomed the policy's strong biodiversity, green infrastructure and landscape-led approach.

The Council welcomed support for the allocation and confirmed that SAE3 forms an important part of the District's economic growth strategy. The Council considers that biodiversity, green infrastructure and biodiversity net gain are adequately addressed through Policies PPL4 and PPL4a, while cumulative ecological effects will be assessed through the Habitats Regulations Assessment. Infrastructure contributions will be assessed against statutory planning obligation tests and must relate directly to the impacts of the development. Whilst recognising the value of higher-value employment sectors, the Council considers that a range of employment uses and site types is necessary to meet identified needs, support economic growth and provide flexibility and choice in the market. No fundamental changes to the allocation are proposed.

MSA1 Durite Works, Valley Road, Harwich

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
6	13480	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	These sites have sewer pumping stations within/adjacent to their boundaries. There should be at least 15m from the pumping station boundary to the nearest residential curtilage within the site to avoid any odour issues. Further advice can be found on our website https://www.anglianwater.co.uk/developing/planning--capacity/assetencroachment	Comment	The Council has reviewed sites containing sewer pumping stations within or adjacent to their boundaries, together with the advice provided on the Anglian Water website, and has updated relevant policies where deemed necessary.
148	14518	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Medium Site Allocation contains areas of the site at medium and high risk of flood in from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	Site allocations have been informed by the Council's Strategic Flood Risk Assessment, and all development proposals will be required to satisfy the Sequential and Exception Tests where necessary, alongside any site-specific flood risk assessment requirements. Further detailed assessment, including Level 2 SFRA work where justified, will be undertaken in accordance with national policy and advice from the Environment Agency and Essex County Council as part of the development management process.
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					
581	4165	Mrs Sally Webb [581]	brown field site	Support	This is noted and the support is welcomed.

MSA1 Durite Works, Valley Road, Harwich

Summary of Representations
Representations submitted under MSA1 focus on the environmental considerations on site. Anglian Water commented that the boundary of MSA1 is adjacent to a pumping station, and the Environment Agency recommended a level 2 SFRA for the site, due to its location within Flood Zone 2. A member of the public commented support for development on a brown field site.

In response, no changes will be made to MSA1 within the Local Plan. The Council will continue to work with Anglian Water and the Environment Agency to ensure the site is compliant with regulations and advice.

MSA2 Land adjacent to Branscombe Close, Frinton

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
1163	14083	Cllr Anne and Pierre Oxley [1163]	I formally object to the proposed housing allocations in Walton-on-the-Naze, Frinton, Kirby-le-Soken and Great Holland. The sites fail the Local Plan soundness tests and conflict with national planning policy due to inadequate infrastructure capacity, unsustainable locations reliant on car travel, highway and traffic impacts, flood risk, loss of greenfield land, and harm to community character. The cumulative impacts on services, transport and the environment are not properly assessed, and site deliverability is uncertain. I ask that the scale and location of these allocations be reconsidered before the Local Plan progresses.	Object	The Council does not agree that the Local Plan conflicts with national planning policy. The site has been assessed with considerations to infrastructure, environmental constraints, and job/retail opportunities. In addition to these assessments, the Council has updated its Infrastructure Delivery Plan (IDP), a data-based report which will inform on where infrastructure, such as roads, sewage, and schools are needed to support new development. The Local Plan is supported by a robust evidence base which has been produced in partnership with infrastructure providers, businesses, and all relevant stakeholders. No modification is proposed.
Members of the Public					
1072	3758	Mr Carl Berge [1072]	Wittonwood Road and Branscombe Close provides the only access for site vehicles. These are too narrow when residents are parked there to safely take the volume and size of construction vehicles. Frinton Primary is a known bottleneck twice a day. Increased traffic during construction would increase the accident risk to children. The resident bat colony would be adversely impacted, as would the various raptors seen daily on the site being a significant source of food for many. I'm doubtful the current drainage system would accept more inputs without significant upgrades.	Object	Noted. Site access will be agreed upon at the planning application stage, rather than through the Local Plan itself. Traffic has been assessed trough updates to transport modelling and the Infrastructure Delivery Plan. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. Drainage and flood risk are also considerations for development. Allocations within the Local Plan have been assessed for flood risk through an updated SFRA . However, the Council will continue to work with the Environment Agency and the relevant stakeholders to assess and mitigate flooding on sites.
1073	3759	Mrs Susan Berge [1073]	It's also unclear if the proposed development is houses or bungalows. Houses would impact area considerably more, as they are more than likely to have children which again would impact small local school and add to safety of area with volume of traffic.	Object	This representation is noted. The types of housing delivered will be decided at the application stage of the planning process, and is informed by the SHLAA. The site has been assessed for infrastructure capacity through updates to the Infrastructure Delivery Plan, which provides information with regard to schools and traffic.
1085	13719	Mr PETER BUCKLAND [1085]	As a resident I strongly oppose the building of houses on Meers Meadow. At present the number of houses/bungalows and the amount of traffic is an acceptable balance. Building 40 properties on this field will upset this balance.	Object	This representation is noted. The Council understands that the housing numbers mandated by the Government are ambitious for the local character of Tendring District. However, it is the Council's view that this development aligns with the Local Plan's spatial strategy and maintains a reasonable balance between development and the environment. Chapter

			Access to Branscombe Close from Wittonwood, as well as access via Cranford close need consideration, as both routes are difficult to navigate. Wittonwood Road is also very busy and is restricted by street parking and level crossing gates. Traffic and railways, in general, are a concern locally. Meers Meadow, where the proposed housing is planned, is a habitat for a variety of wildlife, and thus, development will have impacts on the environment. Infrastructure will not be able to support the proposed development in the area. Thus, there are strong objections to the proposed housing allocation.		7 of the Local Plan contains policies which seek to mitigate adverse effects development may have on the local landscape and biodiversity. Development impacts have been assessed through an updated HRA and Landscape Character Assessment. The Local Plan's allocations have also been assessed for infrastructure capacity through an updated Infrastructure Delivery Plan and transport modelling. The Council will continue to work with infrastructure providers and the relevant stakeholders to ensure growth is supported with the adequate facilities and services.
752	13740	Mr Christopher Walpole [752]	The proposed Frating/Hare Green development is unsustainable due to inadequate infrastructure and services. Major road links (A12 and A120) are already congested, with planned improvements cancelled, and large-scale housing would significantly worsen traffic. Local hospitals, GP surgeries, and schools are struggling to meet current demand and could not cope with further population growth. The development would also result in the loss of high-quality farmland and cause severe ecological harm. Existing flooding problems would likely intensify. Overall, the proposals would exacerbate social, environmental, and infrastructure pressures and should be opposed.	Object	Concerns relating to infrastructure capacity are understood. The Council recently updated its Infrastructure Delivery Plan (IDP) to inform on what infrastructure is needed to support the proposed housing allocations. The Council has also updated its transport modelling to better understand the traffic impacts of such growth. During the development process, the Council will continue to work with infrastructure providers and the relevant stakeholders to ensure the appropriate facilities and services are provided to the public.
1135	13742	Jenny Royce [1135]	As a resident I wish to make the following comments about this proposed development. 1 The environmental damage and destruction of the local habitat will destroy the important ecosystem in this area. 2. Railway track maintenance is done via this field. 3. In the current economic climate and a stagnant housing market what developer is going to take on a small site and risk no sales on completion of the building work? 4. Noise, dust, disruption and increased traffic for the residents of Wilton Wood Road and Branscombe Close during the build will be unacceptable and thereafter with the houses occupied. 5. Infrastructure- No NHS dentist. The only school is oversubscribed and the only GP surgery is not taking on any new patients. 6. The only site access is via Witton Wood Road. This is probably one of the oldest and narrowest roads in the town. Many houses do not have off road parking so congestion with site traffic will increase the difficulty that emergency traffic and refuse collection lorries already face along with residents. At peak daily school start and finish times the roads are grid locked.	Comment	The different aspects of this representation are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. The types of housing are informed by the robust evidence base commissioned in support of the Local Plan. The SHLAA provides a background for the types of housing and amount of housing in demand locally. The Council will continue to work with developers to ensure planning applications align with Local Plan policies and objectives. With regard to infrastructure, the Council has updated its Infrastructure Delivery Plan and transport modelling to inform on the facilities and services needed to support growth. In providing the adequate infrastructure, the Council will continuously cooperate with the relevant infrastructure providers, such as National Highways, Essex County Council and the NHS/ICB. Aspects, such as access to the site, will be decided at the planning application phase, rather than within the Local Plan's policies. As mentioned above, the Council will work with developers to ensure that proposals align with the Local Plan's objectives and policies.

			7. Parking is a huge problem with a station, school, Montessori nursery and GP surgery in Witton Wood Road. No other Road in the town has these which routinely create problems on a daily basis. Finally I would like to urge the Planning Department to look seriously at the access safety aspect of this proposed development and also the town's infrastructure before granting planning permission for houses on this wonderful open field.		
1067	13785	Amanda Timms [1067]	There are concerns about highway safety and access arising from the proposed development. Branscombe Close and Wittenwood Road are narrow, winding residential streets with heavy on-street parking, poor visibility at junctions and regular congestion, particularly near a local school. Residents already experience difficulty accessing their properties, with traffic frequently required to stop or give way. Additional development would worsen safety risks and congestion. As the town has limited access routes and employment opportunities, the proposal would also increase through-traffic in nearby villages. The submission asks that the practical, day-to-day impacts on local residents be given proper weight in decision-making.	Comment	The Council understands concerns relating to safety and traffic. The Council has updated its transport modelling to understand the impacts the proposed housing allocations will have on roads, public transport, and junctions. Please see Chapter 8 for more policies regarding transportation. Although the Council continues to engage with the public, the decisions made with regard to Local Plan policies are backed by a robust evidence base, carried out by experts in the relevant fields. It is the Council's view that housing allocations have been supported by the adequate evidence and assessments, and therefore are justified within the Local Plan.
1087	13859	Mr Stephen Gomez [1087]	My comments on the MSA2 area behind Branscombe Close relate to access, congestion, and environmental impacts. The only access via Wittonwood Road is very narrow, with parked vehicles already restricting movement and preventing two-way passing in places. Existing demand from a doctors' surgery, primary school and nursery already causes congestion, which would worsen with site traffic. Limited access may lead to delays and increased air pollution. Construction activity would also bring noise, dust and disruption, affecting nearby residents. There are concerns about impacts on local wildlife, and existing infrastructure, including GP and NHS dental provision, is already insufficient to support additional development.	Comment	This representation is noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to understand where facilities and services need to be provided in support of growth. More specific provisions of infrastructure, such as site access, will be decided at the planning application phase. The Council will continue to work with developers to make sure proposals are in line with the Local Plan's policies and objectives. With regard to environmental concerns, the Council acknowledges that these developments will have impacts on the local environment, as well as residents. Chapter 7 of the Local Plan contains detailed policies which protect the natural environment and local ecosystems.
1184	13945	Kay Carswell [1184]	Objection to the proposed MSA2 development of 40 houses off Branscombe Close. Site access via Wittonwood Road or Fifth Avenue is unsuitable, as both are narrow residential roads, one passing Frinton Primary School and already adversely affected by past construction traffic and unrepaired pavements. The development would place unacceptable pressure on already limited infrastructure, including school places and GP services. Forty dwellings are excessive for this location and risk setting a precedent for further loss of adjoining farmland. Previous assurances that housing targets had been met have been undermined, eroding trust and raising concerns about ongoing, incremental development.	Object	This representation is noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to understand where facilities and services need to be provided in support of growth. More specific provisions of infrastructure, such as site access, will be decided at the planning application phase. The Council will continue to work with developers to make sure proposals are in line with the Local Plan's policies and objectives.
1309	14017	Tracy Dodkins [1309]	I object to the proposed development behind Branscombe Close, Frinton, due to severe infrastructure constraints and environmental impacts. Access via Wittonwood Road is already heavily congested, with limited parking, single lane flow, and safety concerns for pedestrians, including schoolchildren and elderly residents. Local services, including the doctors surgery and primary school, are	Object	This representation is noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to understand where facilities and services need to be provided in support of growth. More specific provisions of infrastructure, such as site access, will be decided at the planning application phase. The Council will continue to work with

			already at capacity. The junction with Branscombe Close is narrow and unsuitable for increased traffic. There are concerns about flooding, as well as harm to wildlife habitats, including bats and other species. The development would cause significant disruption and loss of valued green space.		developers to make sure proposals are in line with the Local Plan's policies and objectives. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. Drainage and flood risk are also considerations for development. Allocations within the Local Plan have been assessed for flood risk through an updated SFRA . However, the Council will continue to work with the Environment Agency and the relevant stakeholders to assess and mitigate flooding on sites.
1078	14155	Miss Pauline Lovell [1078]	Already Wittonwood Rd has daily congestion with street parking because of the railway station, school and side roads. Branscombe Close is a narrow road and has a public footpath leading to allotments which has cars using it for access. Environmental impact on wildlife in the area.	Object	This representation is noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to understand where facilities and services need to be provided in support of growth. More specific provisions of infrastructure, such as site access, will be decided at the planning application phase. The Council will continue to work with developers to make sure proposals are in line with the Local Plan's policies and objectives. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development.
1330	14162	Colin Harris [1330]	I object to Meer meadow as this is the last green space in Frinton. The meadow is home to foxes, deer, squirrels, reptiles etc. Also concerned about the construction traffic.	Object	This representation is noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to understand where facilities and services need to be provided in support of growth. More specific provisions of infrastructure, such as site access, will be decided at the planning application phase. The Council will continue to work with developers to make sure proposals are in line with the Local Plan's policies and objectives. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development.
593	14199	Mrs Angela S. Hillier [593]	The response raises multiple concerns about proposed housing sites. Several rely on single-track roads with no pavements, particularly off Malting Lane, which could require road widening, disrupt access to the local tip, increase fly-tipping, and place pressure on waste facilities. Increased traffic on Kirby Road would worsen existing congestion, especially at the Walton/Frinton Road junction and during frequent roadworks. Concerns are also raised	Comment	The Council understands concerns relating to safety and traffic. The Council has updated its transport modelling to understand the impacts the proposed housing allocations will have on roads, public transport, and junctions. Please see Chapter 8 for more policies regarding transportation.

			about building on land formerly within the Coastal Protection Belt, including potential flood risk. Large developments on farmland would reduce food production and harm farming viability. There should be genuinely affordable homes for local people and mandatory, meaningful solar panel provision on all new homes. The previous letter outlines issues relating to infrastructure, including a lack of doctors, banks, public transportation, and roads. Infrastructure must be upgraded to cope with development.		The Council has also updated its Infrastructure Delivery Plan (IDP) to inform on where facilities and services are needed in support of growth. The Council will continue to work with infrastructure providers, such as Essex County Council and the NHS/ICB in delivering the necessary infrastructure. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. With regard to housing and housing affordability, the types of housing needed in the District is informed by the SHLAA in the Evidence Base. The Local Plan also contains affordable housing policies which seek to encourage greater homeownership locally. Please see policy LP5 and Appendix G for more information.
1288	14535	Jules Young [1288]	I am writing to formally object to the scale, strategy and site selection of the proposed residential developments within the Frinton, Walton and Kirby area. While I recognise the need for housing delivery, I strongly object to the overall quantum of development proposed for what is, in reality, a small coastal community with limited infrastructure capacity. Sewerage and drainage capacity, Road network and traffic congestion, Healthcare provision, School places. Environmental impact.	Object	This representation is noted. The Council agrees that the housing targets set by the Government are ambitious in reference to the local character of Tendring. However, the Council views the housing allocations proposed within the Local Plan to be the best option for the District. The Council has updated its Infrastructure Delivery Plan (IDP) and transport modelling to understand where the appropriate facilities and services are required to support growth. This includes robust evidence regarding sewerage and draining, healthcare provision, and schools. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development.

MSA2 Land adjacent to Branscombe Close, Frinton

Summary of Representations

Representations under MSA2 have been submitted mainly by members of the public, with one representation submitted by Cllr Anne and Pierre Oxley. Many concerns have been expressed relating to this allocation, citing issues with highways and traffic, railways, parking, as well as access via Witton Wood Road. General concerns regarding infrastructure capacity were also mentioned. Several respondents wrote about environmental impacts of development, arguing the allocation is unsustainable and will result in a loss of greenfield land and biodiversity. Flood risk was discussed as a result of development near to the Coastal Protection Belt, and some representations expressed concerns about noise and disruption from construction. Other issues raised related to the economic climate locally and the stagnant housing market. Housing type was discussed as an important aspect of the allocation; some respondents called for more affordable homes with solar panel provisions. Coalescence was also a concern alongside other social pressure locally. More broadly, one representation argued the allocation did not align with national planning policy.

In response, no changes will be made to the MSA2 allocation. The issues raised have been sufficiently assessed through the updated Evidence Base supporting the Local Plan and policies within different chapters.

MSA3 Affinity Water, Mill Hill, Manningtree

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
1335	4374	Affinity Water Ltd [1335]	The proposed medium sized allocation at land at Mill Hill in Manningtree (Site Ref. MSA3) is supported, and it is requested that this allocation is retained in emerging TDLPR. The land to the south west, off Colchester Road, should be allocated for additional market/affordable housing and/or self and custom build housing.	Support	Support for MSA3 is noted.
Businesses, Landowners and Developers					
1530	14298	Berrys (Lauren May, Senior Planning Consultant) [1530]	We believe that the site allocated for housing development at the Affinity Water site (MSA3) should be removed as an allocation. The proposed density of the scheme would not be in keeping with the surrounding environment and the highway is too narrow for an additional 80 dwellings.	Object	The Council disagrees the allocation would be misaligned with the surrounding environment. The Council will collaborate with developers to ensure the allocation aligns with Local Plan policies, particularly regarding housing density. The Infrastructure Delivery Plan (IDP) and transport modelling have both been updated to inform on the infrastructure required to support this development.
Community Representatives					
1110	4096	Lawford Parish Council (Cllr Giancarlo Guglielmi, County, District, and Parish Councillor) [1110]	Lawford Parish Council would like to have some assurance that as and when this development comes forward, it will be engaged in discussions how to maximise public benefits. We would like to see: 1. Vehicular access from the bottom end on Mill Hill where the original entrance is located together with any improvement highways works at that junction to ensure safety. 2. A safe pedestrian route, perhaps alongside the new development. 3. The whole of Mill Hill resurfaced. 4. Parking restrictions to protect the Colchester Road junction at the top, and verge protection. 5. The introduction of Street lights.	Comment	This representation is noted. Site access will be determined at the application stage of planning proposals, rather than within the Local Plan. This Council has updated its Infrastructure Delivery Plan and transport modelling to inform Local Plan allocations and the infrastructure needed to support them. Although the Council has policies, such as Policy CP1, which support active travel, specific transportation and pedestrian routes are not within the remit of this particular site policy. Parking and street lights are also not within the remit of this particular policy, although they are supported in policy SPL3, which encourages sustainable and inclusive design principles. Please see Chapter 3 for more information.
1653	13443	Suffolk County Council (Georgia Teague) [1653]	MSA3 and MSA4 - 80 dwellings each Based on our pupil yield each development would yield 26 primary pupils and 12 secondary pupils. The developments are adjacent to the catchments area for Brooklands Primary School and East Bergholt High School in Suffolk. Brooklands Primary is forecast to exceed 95% capacity during the current forecast period. 19% of students on roll attend from out of county based on the January 2025 census data. East Bergholt High School is not currently forecast to exceed 95% capacity during the forecast period. However, the number of pupils arising from applications pending decision is	Comment	Although this data will not be addressed through this site policy, information regarding education has been passed on to the consultants who updated the Council's Infrastructure Delivery Plan to better inform the evidence base regarding school provisions. The policy seeks to secure contributions towards education and other infostructure in line with the IDP

			1 https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/section-106-planning-obligations/developers-guide-to-infrastructure-contributions-in-suffolk 1 Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX www.suffolk.gov.ukexpected to cause the school to exceed 95% capacity based on current forecasts. 18% of students on roll attend from out of county based on the January 2025 census data.		
46	13484	Manningtree Town Council (Mrs Ruth Louise Frost, CLERK) [46]	• Concern that Mill Hill is a narrow road with barely enough space for two cars to pass; with parked vehicles, it becomes single track. • Concern that there is no footpath provision along the length of Mill Hill, which is used daily by children attending Highfields Primary School and Manningtree High School, Lawford. • Concern that Mill Lane exits onto Colchester Road and Trinity Road respectively, and in both cases there is very poor visibility of oncoming vehicles. • Concern that the proposed 80 additional dwellings would increase traffic in this area. • Concern about the lack of services, and that the following needs to be taken into consideration: • Primary schools: Enquiries have been made with local schools; the two largest primary schools in the area are at full capacity. • One of these schools has received 150 applications for the coming year but has capacity for only 45 children. • The other larger primary school is also at full capacity and can accommodate only 60 children each year. • Both larger schools would be within walking distance of the proposed development; however, if there are no vacancies at either, applicants would need to apply elsewhere. • There are another couple of smaller primary schools in the area, one of which has limited spaces and the other has greater availability, having reopened in 2024. Both would require applicants from this site to use public transport or drive. • High school: The only high school in the area is already oversubscribed by three places, and there are no plans to continue with this arrangement. There is therefore concern about where these children would attend school. • With the current proposal for more homes, there will be even greater demand on an already stretched health service. • Healthcare: Currently, there is insufficient provision, with just two small doctor's surgeries serving the area. This needs to be addressed before any further demand is added. • Dentists: There is only one dentist serving the community, and they have not been accepting new NHS patients for some time.	Comment	Concerns regarding traffic and road infrastructure are noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to understand where improvements to road infrastructure are needed in order to support housing allocations. Site-specific concerns relating to access will be addressed at the planning application stage, rather than within the Local Pln. The Infrastructure Delivery Plan also informs on the necessary schools, surgeries, and other services needed to support population growth. The policy asks for contributions towards education and other services in line with the IDP. The Council will continue to work with infrastructure providers, such as Essex County Council, the NHS/ICB, and police and fire services to ensure the adequate facilities and services are available to the public.

			• Police and fire services: Additional development would place further pressure on services that are already struggling. • Public transport: Many members of the community use the railway station. At peak times, it becomes a bottleneck and causes significant traffic problems. This should be taken into consideration with the proposed plans. • Access: Access to Suffolk via the A137 is also via the railway bridge. Traffic passing under the bridge has increased significantly, and further housing would exacerbate this issue. • Sewage: Additional development is likely to place further strain on a system that is already struggling and at capacity.		
Members of the Public					
581	4166	Mrs Sally Webb [581]	Sympathetic development; however the springs run under the ground down to the river and careful consideration will need to be given to any development. Also the site if very bio-diverse and needs careful handling.	Support	The Council notes the support for this allocation and the environmental concerns surrounding development. The Council will continue to work with the Environment Agency and the relevant providers to ensure local habitats are protected during the development process. Policies within Chapter 7 of the Local Plan provide more detail on these issues.
941	13425	Wilson McLean [941]	We know though, that the Waterworks is special both historically and architecturally. It enhances Lawford in particular and Tendring in general. Is there no imaginative way this area could be retained for the benefit of the public? Nobody these days would consider the destruction of Mistley Towers and we remember with gratitude those who saved it. The Waterworks is just as important as a symbol for the whole of Tendring. And a lot more of a credit to those who engineered it!	Object	Whilst the comments are noted, it is considered that buildings with potential heritage value should either be submitted to Historic England for formal listing or submitted to the Council as part of its list of non-designated heritage assets.
1251	13755	Elizabeth Dunnett [1251]	Highways Safety Issues: - Mill Hill is a narrow road, with barely space for two cars to pass, and with parked vehicles it becomes a single track - There is no footpath provision for the length of Mill Hill. It is very well used by children attending Highfields School, Lawford. - Mill Lane exits onto Colchester Road and Trinity Road respectively, and in both cases, there is very poor visibility of oncoming vehicles. Any proposal for the site would need to address all the above issues	Comment	This representation is noted. Site access will be determined at the application stage of planning proposals, rather than within the Local Plan. This Council has updated its Infrastructure Delivery Plan and transport modelling to inform Local Plan allocations and the infrastructure needed to support them. Although the Council has policies, such as Policy CP1, which support active travel, specific transportation and pedestrian routes are not within the remit of this particular site policy. Policy SPL3 encourages sustainable and inclusive design principles. Please see Chapter 3 for more information.
1457	14529	Mrs Fiona Gee [1457]	Trinity field This is a protected green space and needs to stay that way. Waterworks site Manningtree , Mill Hill. There are a number of concerns regarding development of this site. 1. The natural life there, a few years ago they had crested newts-it is another vital green space in the town. 2. The narrowness of the road, which is without pavements, and no	Object	Concerns regarding the natural environment are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development.

			easy way of widening it. Also the lack of visibility at both ends of the road make for hazardous junctions. This road is used by school children on a daily basis, there is no way anyone should be adding to the danger of this link road, which would occur with more cars.		Transportation concerns are also noted. The Council has updated its transport modelling and the Infrastructure Delivery Plan to inform on the necessary road improvements required to support this allocation.

MSA3 Affinity Water, Mill Hill, Manningtree

Summary of Representations
Representations received in relation to MSA3 included both support and objections. Many representations focused on access to the site, as well as safe pedestrian routes, parking restrictions, and highways safety. Other representations expressed concerns with regard to infrastructure capacity and the local character of the area. The environment and the natural environment were also mentioned within representations, as the site is near to green space.

Having carefully considered all representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA3 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs

MSA4 Crisp Malting, School Lane, Mistley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
808	14485	Ministry of Defence (Chris Waldron, DIO Assistant Safeguarding Manager) [808]	MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply (See attached document)	Comment	The Council notes this representation. Elsewhere in this local plan there is a requirement for consultation with the Ministry of Defence, where necessary, to ensure safeguarding of the WAM network. For smaller allocations such as MSA4 and MSA9, the Council is satisfied that, given their scale and nature, no additional policy requirements are necessary and any safeguarding matters can be addressed through the planning application process.
148	14519	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Medium Site Allocation contains areas of the site at medium and high risk of flood in from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	The Council notes this representation. Flood risk considerations have informed the site assessment process, and any future development will be required to demonstrate compliance with national policy, including the preparation of site-specific Flood Risk Assessments and any additional flood risk work deemed necessary by the relevant consultees.
Businesses, Landowners and Developers					
1132	3857	SRC Limited [1132]	The respondent and landowners support the site's housing allocation but have received a positive pre app response for a development of 50 dwellings, it is therefore suggested that the 80 dwelling allocation is reduced, as the proposed 80 units hails from a now abandoned proposal for flatted development.	Support	Noted. This representation will be taken forward in the updated Local Plan.
Community Representatives					
1653	13444	Suffolk County Council (Georgia Teague) [1653]	MSA3 and MSA4 - 80 dwellings each Based on our pupil yield each development would yield 26 primary pupils and 12 secondary pupils. The developments are adjacent to the catchments area for Brooklands Primary School and East Bergholt High School in Suffolk. Brooklands Primary is forecast to exceed 95% capacity during the current forecast period. 19% of students on roll attend from out of county based on the January 2025 census data. East Bergholt High School is not currently forecast to exceed 95% capacity during the forecast period. However, the number of pupils arising from applications pending decision is 1 https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/section-106-	Comment	The policy requires development to provide education infrastructure contributions and/or safeguard land for education provision, where necessary, in accordance with the Infrastructure Delivery Plan and the requirements of the relevant Education Authority. The Council is satisfied that the policy provides an appropriate mechanism to address any additional education demand arising from the allocation.

			planning-obligations/developers-guide-to-infrastructure-contributions-in-suffolk 1 Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX www.suffolk.gov.ukexpected to cause the school to exceed 95% capacity based on current forecasts. 18% of students on roll attend from out of county based on the January 2025 census data.		
Members of the Public					
1127	3832	Mr Hamish Symington [1127]	I support the intention to develop the Crisp Maltings site. It is suitable brownfield land / location. I do however object that this is completed while the eyesore of the Mistley Quays site remains to the detriment of the general area and therefore any development of Crisp Maltings. I do not understand how this can continue to be ignored while money is spent elsewhere in the village. Mistley Quay, albeit small, is part of the Manningtree/Mistley tourist pull into the region and a blot on this landscape.	Comment	Comment noted, the site referenced here is not part of the proposed allocation and in private ownership so it's a matter for the relevant landowner to deal with.

MSA4 Crisp Malting, School Lane, Mistley

Summary of Representations

Representations received in relation to MSA4 include both support and objections. The Ministry of Defence recommended the site have policy wording to include the safeguarding of assets and defence sites, and the Environment Agency recommended an updated flood risk assessment for the site. One representation from the landowners suggested the indicative dwelling number be lowered from 80 homes to 50. Suffolk County Council expressed concerns that the development would cause local schools to exceed capacity. A separate representation discussed the need to redevelop a Mistley Quays site.

Having carefully considered all representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA4 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs. However, the Council has lowered the indicative dwelling number from 80 homes to 50 to reflect representations.

MSA5 Brightlingsea Telephone Exchange, 16 New Street, Brightlingsea

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
1717	14320	Telereal Securitised Property GP Limited [1717]	The Brightlingsea Telephone Exchange is suitable, available, deliverable and economically viable to deliver new housing once its existing operation ceases in 2031 and, consequently, during the Draft Local Plan period. The Council's focus on optimising brownfield land in existing towns and villages as well as the allocation of the site under Draft Housing Allocation MSA5 is therefore strongly supported. To ensure consistency with the NPPF, it is considered that emerging policies should optimise allocated sites with any site capacities being expressed as indicative or minima. Relevant wording is provided as part of this submission. Our client and we are willing to engage in positive and pro-active discussions with Tendring District Council between now and the Regulation 19 consultation where this would assist in preparing a justified, sound, and deliverable new Local Plan.	Support	Comment noted.
Community Representatives					
Members of the Public					
642	13771	Mrs S Jenkins [642]	Residents were more in support in general of sites inside the current development boundary and supportive of smaller properties within walking distance of the town centre which seems to fit with MSA5.	Comment	Noted.

MSA5 Brightlingsea Telephone Exchange, 16 New Street, Brightlingsea

Summary of Representations
Representations for MSA5 included support as well as other comments. One respondent expressed the need for consistency with the NPPF, and another stated that residents were more in support of smaller sites within the settlement development boundary.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA5 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA6 Land at Pannell Place, Brightlingsea

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					
1039	3672	Mr Roy Buckland [1039]	With regards MSA6, land at Pannell Place, Brightlingsea. It has become apparent during a property purchase in Pannell Place that none of the roads on the estate have been adopted by the local authority. This means that the roads are privately owned and any developer wishing to build on the plot at MSA6 will have difficulty accessing the site. Even if access was possible the road at Pannell Place has insufficient width for a lorry to pass parked cars. A large lorry would need to illegally drive on the footpath which can cause damage to it and adjacent properties.	Object	The Council has worked with ECC Highways as part of their consideration to potentially allocate this site and no overriding highway safety maters were raised to prevent the site from being allocated. Detailed matters relating to site access, road ownership, highway suitability and construction management would be considered in detail through the planning application process in consultation with the Highway Authority. The Council remains satisfied that the allocation is suitable for inclusion in the Local Plan.
642	13769	Mrs S Jenkins [642]	I would like to bring the attention to the effects of the potential to develop site reference MSA6 as this area is part of an open green space and a network of smaller green spaces which have been shown during consultation for the Neighbourhood Plan for Brightlingsea to be highly valued by the local community. This piece of land and the surrounding fields form a mosaic individual green spaces which host a network of unrecorded paths which are depended on by the local community for their health and well being which bring significant recreational value. We intend to designate these fields, which have been used by the community for well over 20 years, as Local Green Space. Site MSA6 is included in this designation as a valuable open space, valuable for wildlife and the views across this field towards the old Oystermensa Cottages and the Brightlingsea Creek beyond have been identified as valuable to the community. Included in the designation of the Local Green Spaces in the Neighbourhood Plan are the ancient lanes of Mill Street, through to East End Green to the bottom half (and unspoilt section of Robinson Road as a Quiet Lane and a Potected Lane which is one of two in the parish which have retained their hedging and heritage feel and escaped the introduction of kerbs of lighting very much in line with your Healthy Place Policy as Open Spaces of public value.	Comment	The Council recognises the importance that local residents place on the site and surrounding land for informal recreation, landscape setting, wildlife and views, as well as the contribution made by nearby lanes and green spaces to the character of the area. These matters have been considered through the Local Plan evidence base. However, MSA6 is directly adjoining the Brightlingsea Settlement Development Boundary and represents a logical and well-related opportunity for growth. In the context of the significant environmental and physical constraints affecting Brightlingsea and the need to meet housing requirements, the Council considers the site to be a suitable and sustainable location for development. Any future development proposal would be required to take account of landscape character, biodiversity, public access, and other relevant environmental considerations in accordance with the policies of the Local Plan. No modification is proposed.
1280	14111	Pauline Smith [1280]	The map does not show access, so I think it's important to clarify this. Is access via Whitegate or Pannell Place? I would like to see	Comment	This representation is noted. However, details such as site access are not within the remit of this Local Plan and are, rather, discussed at the

			ledges retained - and this to be enforced unlike the Church Field development. This is to provide routes for wildlife.		planning application stage. Policies protecting wildlife can be found in Chapter 7 of the Local Plan.

MSA6 Land at Pannell Place, Brightlingsea

Summary of Representations
Representations submitted for MSA6 included objections and comments. Two representations expressed concerns regarding access to the site, and one representation also noted the narrow roads insufficient for lorry access. Another representation discussed the impacts MSA6 would have on the health and wellbeing of the community and the possibility of designating these fields as Local Green Space.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA6 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA7 Land south-west of Colchester Main Road, Alresford

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
1654	13515	Natural England (Jonathan Burt) [1654]	Together, these two adjacent sites allocate 140 new residential dwellings in a location approximately 1.5km from the Colne Estuary SPA. As such, Natural England advice is that these two adjacent sites combined will have 'alone' recreational disturbance impacts on the Essex Coast Habitats Sites. The recreational disturbance impacts of the two site allocations could be mitigated by a financial contribution to the Cockaynes Wood Trust, as this area of accessible semi-natural woodland habitat is immediately to the west of the proposed site allocation SAH6 and therefore likely to be used by new residents of both allocations for daily recreational activities	Comment	The Council acknowledges Natural England's advice regarding recreational disturbance impacts on the Essex Coast Habitats Sites. Contributions towards suitable mitigation measures, including enhancements to accessible natural greenspace where justified, will be explored through the planning application process.
Members of the Public					
1161	13932	Dave Wendon [1161]	I have opposed the current planing application for a site entrance off Cockaynes Lane that will create further destruction but in light of the government demands Alresford will have to expand further, but must do so without visual destruction or that of the village character. If Alresford sites SAH6 and MSA7 are to be approved for development there needs to be agreement between land owners and previous planning applicants for these two sites to be treated as one. There is a need to preserve what's left of the ancient Cockaynes Lane nature, provide a linked footway through the two sites for shorter access to the centre of the village and station, (thus reducing the need for car use), and realigning the B1027 exit of Cockaynes lane so that it is combined with the access to these sites via a right turn refuge off B1027. The combined road will improve the access and visibility of traffic that already need to use that junction.	Comment	The Council acknowledges the comments regarding village character, connectivity and access arrangements. The policy already promotes a coordinated approach to development of SAH6 and MSA7, and opportunities for integrated access, improved pedestrian and cycle links, and appropriate highway improvements will be considered through the planning application process in consultation with the relevant landowners and highway authority.

MSA7 Land south-west of Colchester Main Road, Alresford

Summary of Representations

Representations submitted with regard to MSA7 discuss the environmental impacts MSA7 and SAH6 may have in combination. Natural England recommends financial contributions to Cockaynes Wood Trust, and another representation calls for the preservation of the ancient Cockaynes Lane nature. A representation also proposed the B1027 exit of Cockaynes lane be combined with the access to SAH6 and MSA7 via a right turn refuge, and that a footbath between the two sites be provided to reduce the need for car use.

	Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA7 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA8 Land adjacent Village Hall, Harwich Road, Beaumont

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
705	4117	Mr Peter Le Grys [705]	This site was put forward by myself on behalf of the landowner. The scheme submitted indicated 12 dwellings were considered suitable. The plan suggests 20 dwellings, which is unlikely to be consistent with the character of other development in the village. Equally, the parish council has expressed some concern with the number of dwellings now proposed by the Council. It is therefore suggested that the proposed development should be reduced to the original suggestion. A scheme is now being developed and likely to be submitted this spring for an appropriate mix of housing.	Support	This suggestion will be taken forward in the Regulation 19 version of the Local Plan.
705	4183	Mr Peter Le Grys [705]	Please see comments regarding allocation of land for 12 dwellings as proposed on behalf of my client, not 20 as suggested by the Council	Support	See above.
Community Representatives					
252	5080	Beaumont Parish Council (Kathy Roebuck, Clerk) [252]	We strongly object to the proposed 20 new homes in Beaumont, arguing that the site's poor transport links, lack of services, flood risk, nitrate-vulnerable status and impacts on protected species conflict with the plan's strategic focus on delivering appropriate infrastructure and protecting biodiversity.	Object	The Council acknowledges concerns relating to transportation, infrastructure, flood risk, and local environment. All housing allocations have been assessed for the above issues and are supported by a robust evidence base. The Infrastructure Delivery Plan has been updated to identify where facilities and services are needed in support of growth. The Local Plan also has policies in support of protecting the natural environment, located in Chapter 7.
Members of the Public					
1256	3921	Mr Declan Graham [1256]	I would like to object to the proposal of planning in the village of Beaumont. This objection is based upon: The limited drainage in the area Thr wish for Beaumont to remain unique. The safety of both cars and pedestrians upon Harwich road.	Object	The Council understands concerns about the local environment and character of Beaumont. Due to the high housing targets set by the Government, the Council must ultimately allocate housing in both small and large settlements throughout the District to meet its short and long-term goals. The Council has chosen an approach to growth which disperses allocations in order to protect the local character of existing settlements and villages. The Council will continue to work with the Environment Agency on drainage concerns. Policies within the Local Plan promote Sustainable Drainage Systems on developments and protect sites from flood risk. Please see Chapter 7 for more information. Transport modelling has been updated as well, identifying where road and junction improvements are needed to support growth. Other policies in the Local Plan, such as Policy CP1, encourage safe active travel and pedestrian pathways alongside development.

1255	3920	Mrs Hayley Atkins [1255]	As a resident in Beaumont I would like to object on the basis of: An impact to local wildlife It is already dangerous and difficult to cross the road. Beaumont in unique and I wish to continue this culture. The area regularly floods. There are limited services and drainage is always an issue	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. The Council will continue to work with the Environment Agency on drainage concerns. Policies within the Local Plan promote Sustainable Drainage Systems on developments and protect sites from flood risk. Please see Chapter 7 for more information The Infrastructure Delivery Plan (IDP) has been updated to inform what facilities and services are needed in support of housing allocations in the Local Plan. Transport modelling has also been updated to provide information as to what roads and junctions need improvements. The Council will continue to work with the relevant infrastructure providers to facilitate the timely delivery of the necessary projects.
988	3618	Mrs Carla Leonard-Wrigjt [988]	Beaumont - The location of the proposed 20 houses does not support families with young or teenage children or an ageing population. Where are there nearest medical centres/hospitals/dentists? Mobility of being located on a hill? The UK's weather conditions are hazardous especially winter with ice and snow. The location would isolate residents with the need for regular visitors to sustain their mental emotional and physical needs increasing traffic on an already busy and treacherous part of the road. There are minimal pavements which are unsafe for pedestrians with limited local resources to access basic amenities and social opportunities.	Object	This representation is noted. The Council has updated its Infrastructure Delivery Plan to identify where necessary improvements to infrastructure, such as medical centres, are needed to support growth. In the interim, the Council will continue to work with the relevant infrastructure providers to ensure the timely delivery of such services. The Council understands concerns surrounding traffic in the area. Transport modelling has been carried out to inform on the impacts development will have on local road infrastructure. The Council will continue to work with Essex and National Highways to ensure the necessary improvements are carried out. Policy CP1 encourages developments to offer alternative methods of travel, such as pedestrian routes, on site. This would also mitigate traffic impacts as a result of development.
988	3626	Mrs Carla Leonard-Wrigjt [988]	Beaumont - landscapes/environment will be gravelly effected, village countryside appeal will be lost. Directly impacts a greater number of properties which are over 100 years old. The village destroyed for the sake of 20 homes. This will not support integration but cause division many will be made to leave due to significant location error. Will they be compensated? Enhanced WiFi will not address transport issues, dangerous roads minimal pavements lack of local facilities, limited bus routes, nearest train station 2.4 miles.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. An updated Infrastructure Delivery Plan will inform on the necessary infrastructure improvements needed to support development. This includes an analysis of transport issues, local facilities, bus routes and other facilities. The Council will continue to work with the relevant

			Area has no gas uses a sewage tank Subsidence risk and use of farmland will effect drainage system.		providers and organisations, such as the Environment agency, to ensure that drainage and infrastructure are addressed throughout the development process.
989	3627	Mr Lewis Leonard-Wright [989]	Beaumont - village landscape and environment would be changed forever. Would impact more properties and residence than any benefit of 20 dwellings. Location would have significant negative impact on residents homes and their mental health and wellbeing - many will want to leave due to this. Enhanced WiFi will not address transport issues, dangerous roads minimal pavements lack of local facilities , limited bus routes, nearest train station 2.4 miles. Area has no gas, local properties use a sewage tank which already has challenges, Subsidence risk of building on a hill and use of farmland will affect the drainage system.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. An updated Infrastructure Delivery Plan will inform on the necessary infrastructure improvements needed to support development. This includes an analysis of transport issues, local facilities, bus routes and other facilities. The Council will continue to work with the relevant providers and organisations, such as the Environment agency, to ensure that drainage and infrastructure are addressed throughout the development process.
989	3628	Mr Lewis Leonard-Wright [989]	Beaumont - The location does not support families with young or teenage children or an ageing population. Where are there nearest medical centres/hospitals/dentists? Mobility of being located on a hill? The UK's weather conditions are hazardous especially winter with ice and snow. The location would isolate residents with the need for regular visitors to sustain their mental emotional and physical needs increasing traffic on an already busy and treacherous part of the road. There are minimal pavements which are unsafe for pedestrians with limited local resources to access basic amenities and social opportunities	Object	This representation is noted. The Council has updated its Infrastructure Delivery Plan to identify where necessary improvements to infrastructure, such as medical centres, are needed to support growth. In the interim, the Council will continue to work with the relevant infrastructure providers to ensure the timely delivery of such services. The Council understands concerns surrounding traffic in the area. Transport modelling has been carried out to inform on the impacts development will have on local road infrastructure. The Council will continue to work with Essex and National Highways to ensure the necessary improvements are carried out. Policy CP1 encourages developments to offer alternative methods of travel, such as pedestrian routes, on site. This would also mitigate traffic impacts as a result of development.
324	3682	Mrs djakfjl ldjfasljdl [324]	Beaumont is not connected to main sewage/gas, no adequate local amenities/employment opportunities with a reliance on the private car for journeys. No strategic road network. Increased traffic on B1414, poor visibility on sharp/blind bends, intensification of existing access creates highway safety concerns. Does not respect the village's rural character. It is important to protect its heritage, identity & angricultural economy. Loss of green spaces will have an adverse impact on habitats for protected species.	Object	The Council understands infrastructure concerns locally. The Infrastructure Delivery Plan and transport modelling have been updated to inform on the necessary upgrades to roads and facilities needed to support growth. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development.

1122	3810	Mrs Diane Key [1122]	We have no mains sewerage or gas, the field behind my house floods and snow drifts cut off village Not located on a strategic road Network, every house will require a vehicle to get anywhere, the bus service is not even hourly 30 mph road however vehicles are frequently speeding & very bad visibility when coming out of driveway, new houses would make this very dangerous Development will not respect the villages rural character, heritage & identity and its important to sustain the villages agricultural economy Loss of green space will have an adverse impact on habitats and protected species	Object	The Council understands infrastructure concerns locally. The Infrastructure Delivery Plan and transport modelling have been updated to inform on the necessary upgrades to roads and facilities needed to support growth. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development.
1346	3998	Jennifer Chante [1346]	Objection to development at MSA8 (Beaumont) on the following grounds: overbearing impact and significant reduction of afternoon sunlight to existing properties; risk of surface water runoff into sloping driveways of 2 and 3 Coronation Villas; night-time light spill at very close range to existing properties, affecting residential amenity, rural character, and nocturnal wildlife; threat to observed owls, kestrels, bats, and hares in the area; negative impact on autistic residents (under Public Sector Equality Duty (Section 149, Equality Act 2010), the council must have due regard to the potential impacts of its decisions on people with protected characteristics).	Object	The Council notes concerns around loss of views and impact on property prices however these matters are not material planning considerations and cannot be taken into account as part of the local plan process. However, Policy LP4 has been updated to include specific reference to neuro-inclusive design. With regard to environmental concerns, the Local Plan contains many policies which protect the natural environment, within Chapter 7. Please see the relevant chapter for more information. The Council will continue to work with the Environment Agency and the relevant partners to ensure developments are sustainable and environmentally conscious.
1346	3999	Jennifer Chante [1346]	Further grounds of objection for development on MSA8 (Beaumont): The village is not connected to mains sewage; village does not have sufficient public transport links (one bus every 2 hours), therefore all new residents would rely on private cars; development would increase traffic on a road with poor visibility with sharp/blind bends, which already causes accidents; development would harm the village's rural character and identity.	Object	The Council has updated its Infrastructure Delivery Plan to ensure that housing allocations are supported with the appropriate infrastructure, such as public transportation and sewage. Transport modelling has also been updated to inform on where updates are needed to road infrastructure. The Council will continue to work with the relevant infrastructure providers to ensure that facilities and services are delivered in a timely matter.
581	4167	Mrs Sally Webb [581]	Within the village, but the village has no facilities	Support	The Council understands infrastructure concerns locally. The Infrastructure Delivery Plan and transport modelling have been updated to inform on the necessary upgrades to roads and facilities needed to support growth.
1358	4198	Mr Geoffrey Macey [1358]	I object to the specific proposal to build 20 properties in Beaumont. You seem to be reversing your stance over many years to only allow minor infill with specific conditions. Beaumont is unsuitable for environmental and social reasons outlined below. 1. Village location has insufficient infrastructure- draining, power, transport, doctors and schools. The site is on a dangerous piece of road close to Oak Corner, a	Object	This representation is noted. Whilst the Council may have previously expressed different planning ambitions in recent years, updates to the Government's housing targets mean the Council's approach to building must change to meet statutory targets. In doing so, the Local Plan sets out a spatial strategy that disperses growth across settlements to meet short and long-term housing goals. The Council has updated its Infrastructure Delivery Plan to ensure that housing allocations are supported with the appropriate infrastructure,

			hotspot - previous car access refused to residents. Local residents would have rural setting disrupted Soil pollution would be created by cess pit drainage- very concentrated high nitrate water concentration Adjacent properties devalued.		such as doctors and schools. Transport modelling has also been updated to inform on where updates are needed to road infrastructure. The Council will continue to work with the relevant infrastructure providers to ensure that facilities and services are delivered in a timely matter. Cooperation with the Environment Agency and the relevant organisations will be maintained to ensure that developments are environmentally conscious and sustainable. The Council notes concerns around loss of views and impact on property prices however these matters are not material planning considerations and cannot be taken into account as part of the local plan process
1402	4337	Mr Alan Roebuck [1402]	Beaumont Parish Council's Objections relate to; Not in keeping with rural character of village. Absence of services and facilities requiring frequent car journeys due to poor public transport links. Few pavements, verges or lighting making walking and cycling dangerous. High risk of flooding of neighbouring properties. Waste water leaching into aquifers. (NVZ) Damage to habitat of protected species. Estuarine Moth, Hogs Fennel, Horseshoe bats, Crested Newts and Common lizards. Road safety issues, blind bend, accident blackspot, motorists speeding.	Object	Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. Issues relating to waste water and pollution have been addressed by an updated Water Cycle Study. The Council will continue to work with the relevant partners to ensure development is sustainable. With regard to facilities and services, the Council has updated its Infrastructure Delivery Plan and transport modelling to understand what upgrades are needed to support growth. Policy CP1 encourages developments to include active travel networks in proposals. Please see Chapter 8 for more information regarding transportation.
1445	4473	Miss Julie Watson [1445]	The proposed development in Beaumont-cum-Moze is absolutely ludicrous and should be dismissed completely from consideration. There is no mains drainage system or gas available within the village, the proposed area would require a dangerous access point onto a bend on a main road, there are no employment opportunities, but there is a lack of schools, dentists, doctors and other facilities, limited public transport meaning people will need to commute to work, increasing congestion on already overloaded, constantly congested roads. And yet more loss of our precious farmland and natural spaces.	Object	Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. Issues relating to waste water and pollution have been addressed by an updated Water Cycle Study. The Council will continue to work with the relevant partners to ensure development is sustainable. With regard to facilities and services, the Council has updated its Infrastructure Delivery Plan and transport modelling to understand what upgrades are needed to support growth. Policy CP1 encourages developments to include active travel networks in proposals. Please see Chapter 8 for more information regarding transportation.

1174	13727	John Crossley [1174]	I wish to register my objection to the proposed building of 20 new houses on Harwich Road Beaumont Cum Moze. The village of Beaumont is not connected to mains sewage. It does not have adequate local amenities or employment opportunities with a reliance on the private car for all journeys. 20 new houses will cause increased traffic on B1414 with poor visibility on sharp/blind bends and intensification of the existing access creates highway safety concerns. The proposed development does not respect villages rural character. It is important to protect this villages heritage and identity. Sustain the villages agricultural economy Until recently the proposed land was used to produce crops also this site is with in the proximity to historic sites and listed buildings. The loss of green spaces will have an adverse impact on habitats for wildlife and protected species. There is no street lighting, minimal pavements for pedestrians, the ability to get on and off drives is already hazardous and no local gas supply.	Object	Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. Issues relating to waste water and pollution have been addressed by an updated Water Cycle Study. The Council will continue to work with the relevant partners to ensure development is sustainable. With regard to facilities and services, the Council has updated its Infrastructure Delivery Plan and transport modelling to understand what upgrades are needed to support growth. Policy CP1 encourages developments to include active travel networks in proposals. Please see Chapter 8 for more information regarding transportation.
1617	13756	Jules Woods [1617]	Objection to the proposed 20-dwelling development in Beaumont-cum-Moze, as it is inappropriate for a very small rural hamlet. The scale of development would increase the settlement by around two-thirds, fundamentally altering its character and harming the surrounding countryside and nearby SSSI. The proposal would also result in the loss of arable land, negatively impact wildlife, and increase traffic on unsuitable local roads lacking pedestrian infrastructure. More broadly, it highlights that housing growth across Tendring has not been matched by necessary infrastructure investment.	Object	Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. Issues relating to waste water and pollution have been addressed by an updated Water Cycle Study. The Council will continue to work with the relevant partners to ensure development is sustainable. With regard to facilities and services, the Council has updated its Infrastructure Delivery Plan and transport modelling to understand what upgrades are needed to support growth. Policy CP1 encourages developments to include active travel networks in proposals. Please see Chapter 8 for more information regarding transportation.
1519	13778	Kim Fullalove [1519]	Objection to the proposed 20-home development at Beaumont-cum-Moze, as there are multiple local impacts. Concerns include increased flood risk due to poor drainage, lack of mains sewerage, fragile power supply, and unstable ground conditions requiring deep piling. The site's access on a fast, curved section of Harwich Road raises highway safety risks, particularly for pedestrians and bus users. The village has minimal amenities, limited public transport and already busy roads, leading to car dependency. The proposal may also harm a nearby scientific interest site supporting the rare Fisher's Estuarine Moth.	Object	Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. Issues relating to waste water and pollution have been addressed by an updated Water Cycle Study. The Council will continue to work with the relevant partners to ensure development is sustainable.

					With regard to facilities and services, the Council has updated its Infrastructure Delivery Plan and transport modelling to understand what upgrades are needed to support growth. Policy CP1 encourages developments to include active travel networks in proposals. Please see Chapter 8 for more information regarding transportation.
1266	13779	Clive Bishop [1266]	In my opinion the access to the proposed site is very dangerous because of the lack of visibility, Also the field frequently floods as in Beaumont there is no proper drainage, Also the sewage would present a big challenge as there is no main sewage only septic tanks that struggle with the water table in the winter. So for these reasons myself and my wife totaly object to the proposed plan.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. The Council will continue to work with the Environment Agency on drainage concerns. Policies within the Local Plan promote Sustainable Drainage Systems on developments and protect sites from flood risk. Please see Chapter 7 for more information The Infrastructure Delivery Plan (IDP) has been updated to inform what facilities and services are needed in support of housing allocations in the Local Plan. The Council will continue to work with the relevant infrastructure providers to facilitate the timely delivery of the necessary projects.
1526	13787	David Day [1526]	I object on the following grounds. 1. The use of arable land is criminal 2. This block of houses doesn't fit in with the village. no drainage. Blocks the view of 10 houses. No local amenities. There are several small building sites through the village that could be used and fit in. There is total objection to this development.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. Cooperation with the Environment Agency and the relevant organisations will be maintained to ensure that developments are environmentally conscious and sustainable. The Council notes concerns around loss of views and impact on property prices however these matters are not material planning considerations and cannot be taken into account as part of the local plan process
1486	13790	Gary Francis [1486]	I formally object to the proposed development of 20 dwellings on land off Harwich Road, Beaumont-Cum-Moze, due to concerns about its wider impact. Harwich Road is already well used, and additional traffic would worsen congestion and place further strain on the local network. The development risks setting a precedent for incremental expansion, undermining the village's semi-rural character. Local services, including GP surgeries and schools, are	Object	Concerns with regard to traffic are understood. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on where upgrades to roads and facilities, such as GP surgeries and schools, are needed. Policies within Chapter 7 of the Local Plan address concerns relating to drainage and flood risk. Allocations within the Local Plan have been

			already under pressure and may not cope with further growth. There are also concerns regarding drainage, flood risk, and environmental impact. Previous refusals on similar grounds should be applied consistently, as this represents unsustainable development.		supported by an updated SFRA and Water Cycle Study within the Evidence Base.
1499	13830	Katherine Smith [1499]	I object to the proposal of building 20 houses in Beaumont because this small rural farming area that is not suitable for such a development due to lack of infrastructure. For example, no mains drainage, no mains sewerage, electricity, oil, gas, or amenities like doctors or schools in the village. The road on which this development is proposed is a dangerous position with no pedestrian access to that side of the road and unfortunately drivers do not drive to the speed limit. I live very close to the area in question, and we have regular drainage issues and a very high water table which means our front door often has water right up to it in heavy rain. There is protected wildlife in Beaumont which must be protected for future generations. There is no employment in the village. I feel with all the points I have raised; this area is not suitable for a new development. The current local plan specifically says that Beaumont is not suitable for development of this type. A different more suitable area should be considered instead of Beaumont.	Object	This representation is noted. The Infrastructure Delivery Plan (IDP) has been updated to inform what facilities and services, such as sewage, doctors, and schools, are needed in support of housing allocations in the Local Plan. The Council will continue to work with the relevant infrastructure providers to facilitate the timely delivery of the necessary projects. The Council understands that not all allocations are located in settlements with many employment opportunities. Due to the ambitious nature of the Government's new housing targets, the Council has decided to disperse development across the District. Although development in smaller settlements, such as Beaumont, may be less sustainable, it ensures the short-term housing goals of the Council can be met. The Local Plan seeks to balance the need for housing with protecting the natural environment. Chapter 7 of the Local Plan contains several policies which protect local ecosystems and biodiversity. The Council will continue to work with the Environment Agency and Natural England to ensure development is environmentally sensitive.
1627	13847	Martin Styles [1627]	Beaumont is considered unsuitable for development in the current local plan. The need to build more houses to meet government targets does not change this. If more houses really are required then they should be built in areas suitable for development; with the appropriate services, transport links etc. Objecting to Section MSA8 in table LP1. Beaumont is considered not suitable for development in the current local plan; the reasons for this are clearly stated in the current plan and still hold true. The 20 houses proposed for Beaumont in the proposed plan should be built in areas considered suitable for development.	Object	The Council acknowledges that it's approach to development has changed since the adoption of the current Local Plan. Due to the increase in housing targets set by the National Government, the Council has had to reconsider settlements previously designated for no development for small allocations within the updated Local Plan. Although development in smaller settlements, such as Beaumont, may be less sustainable, it ensures the short-term housing goals of the Council can be met.
1516	13865	Melody Lander [1516]	I object to the proposed housing plans in Beaumont-cum-Moze, as the scale of development is disproportionate to a rural hamlet of just over 300 people. The village lacks essential infrastructure, with no mains gas, limited services, and minimal public transport, making it heavily car-dependent. Additional housing would significantly increase traffic on Harwich Road and Chapel Road, both of which already experience speeding and access difficulties. The limited facilities and rural road network are not suited to accommodate further growth, and even a modest number of additional homes would have a substantial and detrimental impact on the village.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. With regard to facilities and services, the Council has updated its Infrastructure Delivery Plan and transport modelling to understand what upgrades are needed to support growth. Policy CP1 encourages developments to include active travel networks in proposals. Please see Chapter 8 for more information regarding transportation.

1505	13965	Lucy Cohen [1505]	Objection to the proposed construction of twenty houses in Beaumont, a small rural village with limited services and infrastructure. Traffic on the B1414 has already increased significantly, with poor speed compliance, sharp bends and demonstrated safety risks that further access points would worsen. The village is not on a strategic road network, has minimal public transport, no mains sewerage, no gas supply, limited pavements and ongoing drainage problems. Most residents rely on private cars for essential services. The site lies close to historic assets, previously productive farmland and wildlife habitats, and development would urbanise open countryside, harm biodiversity and fundamentally alter Beaumont's rural character.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development With regard to facilities and services, the Council has updated its Infrastructure Delivery Plan and transport modelling to understand what upgrades are needed to support growth. Policy CP1 encourages developments to include active travel networks in proposals. Please see Chapter 8 for more information regarding transportation.
1054	13969	Miss Lauren Francis [1054]	Objection to the proposed 20-dwelling development at Beaumont-cum-Moze, as it represents clear overdevelopment of a constrained and irregular site, harming local character and density. The proposal would cause unacceptable impacts on residential amenity through overlooking, loss of privacy, noise and disturbance. Highway safety concerns are significant, given narrow roads, limited visibility, and existing capacity constraints, with no evidence that additional traffic can be safely accommodated. Drainage, flood risk and coastal impacts have not been adequately addressed, and the development would further strain already overstretched local services. The cumulative effect of incremental development risks lasting damage to the area, and planning permission should be refused.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development However, the housing allocations within the Local Plan are supported by a robust Evidence Base, including an SFRA and HRA which assess ecological and flood risk impacts. Traffic has also been assessed through updates to transport modelling and the Infrastructure Delivery Plan (IDP). These documents inform on where upgrades to infrastructure are needed in support of growth.
1511	14071	Simon Morris [1511]	My comments on the proposed development in Beaumont cum Moze relate to concerns about flooding, infrastructure, safety and environmental impact. The area already experiences flooding from surrounding land, and additional housing would increase pressure on an already fragile drainage system. There are also concerns about the capacity of the local electricity supply and limited access to GP services. The proposed location, between two sharp bends on a road where speed limits are often ignored, raises safety issues. In addition, the proximity to a Site of Special Scientific Interest, home to protected species, highlights potential impacts on the natural environment.	Object	Housing allocations within the Local Plan have been adequately assessed through updates to the SFRA and HRA. However, the Council will continue to work with the Environment Agency and all relevant organisations to ensure development is sustainable and environmentally sensitive. The Council has also updated its Infrastructure Delivery Plan and transport modelling to inform on where upgrades to facilities and services are needed din support of development. Cooperation will continue between infrastructure providers and the Council to ensure projects are delivered in a timely manner.
1265	14159	Tracy Stevens [1265]	Monday evening ,our village Beaumont cum moze had a public meeting about the proposed site opposite Coronation Villas ,Harwich Road. To build 20 houses I would like too strongly object to this, on the basis of my comments below Firstly, I have lived in Beaumont all of my life having been born in the 60's. The person who died on the Harwich Road whilst crossing it, in the 70's was actually	Object	The representation is noted. Traffic and road infrastructure have been thoroughly assessed trough updates to transport modelling and the Infrastructure Delivery Plan. These reports identify where upgrades to facilities and services are needed in order to support growth. The Council will continue to work with Essex County Council and the relevant

			my brother aged 15 years. The school buses continued to stop there twice a day. Only the traffic has increased 100-fold and the speed now is extremely worrying. Building these houses will not only be more hazardous on that road with the extra traffic but mixed with children crossing for their buses and no curbs, fills me with dread! There are 133 dwellings in our little village, 20 more homes is an increase of 15 %, we have no amenities here , we get flooded in places every year. We managed this situation but 15 % more dwellings simply would tip the scales! We have no work here or anywhere around here, that would be able to employ these people that may live there. So, these people start to more through this village and it becomes a rat run up to Weeley roundabout to get onto the A120 Can you tell me, honestly, if 'Thorpe le Soken' has been a success! You have destroyed the Village; the high street is a nightmare to get through. That is without all those new homes being sold! The site proposed in Beaumont backs onto fields with varying wildlife, and rare plants that are protected. Why on earth would any council rip up a field to destroy that. This parish was first mentioned in the Domesday book! So, we have a history! Let's move forward but not in this proposed way. There are several plots dotted around the village that could support a dwelling. Pretty, in keeping properties! We have already had dwellings converted in Church Lane, very in keeping. That are up for sale now. Please listen to the local people as we know the village better than anyone.		infrastructure providers to ensure projects are delivered in a timely manner. Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development.
1069	14160	Mrs Caroline Morgan [1069]	I strongly object to the proposed development of 20 houses to be built in a small field opposite Coronation Villas. There is not the infrastructure. We are not connected to a main sewerage system, we have oil heating, the road is dangerous already with bends and people speeding, there is limited pathways for pedestrians. There are no local facilities in walking distance. The village is very rural and could not cope with 20 houses and how many more people.	Comment	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development Traffic and road infrastructure have been thoroughly assessed trough updates to transport modelling and the Infrastructure Delivery Plan. These reports identify where upgrades to facilities and services are needed in order to support growth. The Council will continue to work with Essex County Council and the relevant infrastructure providers to ensure projects are delivered in a timely manner.

MSA8 Land adjacent Village Hall, Harwich Road, Beaumont

Summary of Representations

Representations submitted for MSA8 included a mix of support and objections. One representation suggested the indicative dwelling number be reduced from 20 to 12. Objections to the site argued that it has poor transportation links, a lack of facilities and services, flood risks, and environmental constraints. Other representations stated the development would affect local character and property values.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA8 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs. However, the indicative dwelling number has been decreased from 20 to 12 to reflect representations submitted and to ensure a more proportionate level of growth for this small rural settlement.

MSA9 Land south of Windmill Road and east of Straight Road, Bradfield

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
705	4120	Mr Peter Le Grys [705]	A better site has been suggested and not included within the Plan for land off Barrack Street which would have significantly less impact upon the wider area and far closer to the local facilities and amenities than the proposed site.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village.
705	4197	Mr Peter Le Grys [705]	Failure to include site subject of previous representation on land off Barrack Street. The site is more sustainable and will have less impact upon landscape than other options suggested in the Plan.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village.
1694	13648	McNair Ltd [1694]	The Site occupies an edge-of-village location, which is closely connected to the existing built up area and local facilities, which are accessible from Mill Lane. The site comprises approximately 2 ha of agricultural land. It lies to the north-west of Bradfield, which is a sprawling village located east of Mistley and Manningtree and south of the River Stour. Bradfield is identified as a smaller rural settlement in the Draft Local Plan settlement hierarchy (SPL1). Bradfield is connected to other towns and villages via the B1352, Mill Lane and Heath Road. The Village Maid and Cansey Lane bus stops are located 800 metres from the site, and provide regular bus services to Mistley, Manningtree, Harwich and Colchester, as well as other surrounding villages. The bus services also stop off at Mistley railway station which is 3.5km from the site, and Warbness railway station which is 5km from the site. These stations provide regular rail services to Manningtree, Dovercourt and Harwick Town. Therefore, Bradifled whilst it does not have railway station it is well placed to be within easy reach of two stations nearby which can be accessed by public transport. (5 minutes by car or 11 minutes by cycling). The site is located within a logical location for new residential dwellings in Bradfield. It lies in an enclosed parcel of land that is well related to the existing village, with Strangers Holiday Park and residential dwellings to the east, and	Comment	

			Millgrove Wood to the west, which is an Ancient Woodland. The site fronts Mill Lane, with existing trees and vegetation providing some screening from the road. The site is accessed via Mill Lane and Station Road. In terms of constraints, the site is located adjacent to the Bradfield settlement boundary. The site is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The site is wholly located within Flood Zone 1, where there is a low risk of fluvial flooding. The site is at low risk of surface water flooding. The site is not subject to any historic designations. Mill House is a Grade II Listed Building located south of the site. The site is available now, and unconstrainted by legal or ownership issues, and is capable of being delivered within the plan period without the need for additional and significant infrastructure, enabling it to contribute positively to housing delivery and supply, and the long-term viability of Bradfield in accordance with local and national planning policy. The allocation of the site would enable housing to be delivered in the short to medium term to give the plan flexibility rather than rely on large urban extensions. (See attached document)		
134	13695	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The allocation of this land is strongly supported. The site has few constraints and is proportionate to the size of Bradfield. It will help to consolidate existing dwellings into the village via new, sustainable modes of transport.	Support	Noted. Support for the site is welcomed.
1643	14213	Bradfield Fruit Farm (Johnny Piper) [1643]	Our representation objects to Policy MSA9, arguing that the Windmill Road / Straight Road site is poorly located, less sustainable, and unlikely to deliver housing effectively. It highlights inadequate pedestrian infrastructure, unsafe and unlit walking routes, greater reliance on car travel, and distance from the village's activity hub, school and facilities. The proximity of incompatible land uses (including a traveller site) is cited as a delivery and viability constraint. Our representation contends that prioritising MSA9 over the Bradfield Fruit Farm site undermines sustainable development, health, active travel, and plan soundness.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village.
Community Representatives					
96	13432	Bradfield Parish Council (Mrs Marie Snell, Clerk to the Council and Responsible	Although an additional one hundred dwellings built at this location in Windmill Road represent just 0.6% of the government mandatory housing number for TDC, it is a 20% increase in the number of homes in Bradfield. The TDC document however shows no recognition of this significant increase in housing or proposes any upgrades or improvements to the infrastructure or facilities in the parish of Bradfield.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village.

		Financial Officer) [96]	The development of 100 new homes constitutes an obvious housing estate. It would be disconnected from the centre of the village and is a disproportionate over-development. It does nothing to enhance social integration, but rather, has the potential to create an isolated community. It would also be out of character with the way Bradfield has developed over generations and will result in a 'cultural shock'. This development does not take into account local need. It is the view of BPC that there are some limited opportunities for a small number of new homes to be built in the parish, supporting local need.The TDC document suggests that 30% of the dwellings built would be 'Affordable'. Which authority would own the nomination rights for the 30 Affordable Houses built at this location? Clearly Bradfield Parish does not have such an identified local need. The proposition to build one hundred family homes will result in a considerable number of new children living in Bradfield. However, there is just one primary school in the village, which is a mile each way, from the proposed development, making walking and cycling unrealistic. However, Bradfield Primary School is also oversubscribed with waiting lists. Due to the school's location, on a small footprint, and sitting within existing dwellings, extensions or redevelopment are not feasible. The proposed plans also make no provision for additional recreational space, and the existing recreation ground is 1.4 miles each way from the proposed site. Therefore, walking to this facility is also unrealistic. Bradfield Parish Council does not support the construction of 100 dwellings at the proposed site in Windmill Road Bradfield. The plans are unrealistic and unsustainable.		
Members of the Public					
1744	14553	Lorraine Shakesheff [1744]	Increase of village size by 20% in a small dense space significantly changing village character and local area Surrounding roads unsuitable for increase of traffic at such high volumes Use of Greenfield sites over Brownfield sites.	Object	This representation is noted.
1075	3760	Mr Peter Taplin [1075]	Object to MSA9. Impact on wildlife, dark skies, transport, schooling, services, flood risk and much more. See reason in the comments that I have provided.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. With regard to environmental concerns, the housing allocations within the Local Plan have been assessed for their impact to local wildlife in the updated HRA. Flooding has also been assessed through an updated SFRA and continued cooperation with the Environment Agency. Policies

					in Chapter 7 have been maintained and updated to protect the natural and historic environment. Concerns surrounding infrastructure are also noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on the necessary upgrades to facilities and services needed to support growth. This includes upgrades to schools, GP surgeries, roads, sewage. The Council will continue to work with the relevant infrastructure providers to ensure projects are delivered appropriately.
1089	3775	Mrs Hazel Cannons [1089]	I strongly object to the proposal to build 100 properties in Bradfield. No employment. V small village school. Further education centres away from village. Bad bus service rail station 5 miles away. Sewerage problems ongoing. Good agricultural land, will never come back. Inadequate GP and dentists. Overpopulation at Mistley. No jobs, so who wants to buy. No jobs more unemployed people on benefits. How does that help the tax payers etc etc.	Object	The Council understands that not all allocations are located in settlements with many employment opportunities. Due to the ambitious nature of the Government's new housing targets, the Council has decided to disperse development across the District. Although development in smaller settlements, such as Bradfield, may be less sustainable, it ensures the short-term housing goals of the Council can be met. The Council has updated its Infrastructure Delivery Plan to inform on the necessary infrastructure improvement required to support growth, including schools, GP surgeries and other facilities. The Council will continue to work with the relevant infrastructure providers to ensure projects are delivered appropriately.
368	3778	Mr Peter Rose [368]	The government is enforcing increased Housing in this area, the community needs to help Tendring DC to agree sites and adopt a local plan, if we don't large corporations will use the appeal courts and government to build large poorly place housing developments in the place of their choosing rather than ours. This site is well located within Bradfield, minimal increase in village envelope, reasonable road access, gets Bradfield some affordable housing and addition open space, and achieves the growth earmarked for this village with the least negative impacts.	Support	Support for this allocation is welcomed.
1091	3779	Mr Richard Speck [1091]	The proposed application for Bradfield, Windmill Road. I am objecting against this development on the following grounds. Windmill Road could not cope with the extra traffic, there is not room at certain points for the 104 bus and a car to pass at the same time. This also includes parcel delivery vans. There are not enough school places at the school. The access along straight Road would also not be viable, there would be a high chance of accidents.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. Concerns surrounding infrastructure are also noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on the necessary upgrades to facilities and services needed to support growth. This includes upgrades to schools, GP surgeries, roads, sewage. The Council will continue to work with the relevant infrastructure providers to ensure projects are delivered appropriately.

1092	3780	Mrs Bev Speck [1092]	I oppose to the development in question due to lack of school Places, road access and more traffic and disturbance to the wildlife in the area	Object	Concerns regarding infrastructure are noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on the necessary upgrades to facilities and services needed to support growth. This includes upgrades to schools, GP surgeries, roads, sewage. The Council will continue to work with the relevant infrastructure providers to ensure projects are delivered appropriately.
1098	3783	Ms Abbie Hunns [1098]	Bradfield is designed to be a village. Expanding it by 100 houses will negatively impact the character of the village and cause congestion on the main road through the village which is already packed every 8:30am, 3pm and 5pm. If you wanted to provide 10 new affordable and good quality houses that were suitable for young people [redacted] looking to move out then that would be different. That would fulfil a need. However, there is no need for 100 houses in Bradfield. Development in the nearby area is already excessive, we don't need more here.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village.
1099	3784	Mrs Patricia Cousins [1099]	We do not need 100 new houses on windmill road/straight road, I understand we need more affordable houses to help young families but not 100 and the roads are not suitable to take that amounts of houses as they are in a dreadful state!	Comment	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. The Council has updated its transport modelling and is working with Essex Highways to ensure the adequate upgrades to infrastructure are secured alongside new development.
905	3785	Mrs Eve Noy [905]	This proposed development would have a detrimental impact on village and wildlife lOur roads are narrow and any further traffic would make the roads impassable. The school is at capacity and there is no parking causing gridlock Tendring has just approved a huge development at Elmstead Market and surely this will provide enough housing without the need to extend our village envelope destroying wildlife habitat and loss of green space Manningtree station is to capacity and the access roads are made for village life	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development Traffic and road infrastructure have been thoroughly assessed trough updates to transport modelling and the Infrastructure Delivery Plan. These reports identify where upgrades to facilities and services are needed in order to support growth. The Council will continue to work with Essex County Council and the relevant infrastructure providers to ensure projects are delivered in a timely manner.
1124	3830	Mrs J Keech [1124]	.	Object	Noted.
1068	3977	Mr Martin Simmonds [1068]	Objection based on impact to neighbouring properties, disruption to wildlife, unsuitability of existing roads in Bradfield, and the impact of additional 200 cars. Nearby large scale developments in Mistley caused serious damage to the drainage facilities in Bradfield last	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to

			year. The drains and water supply facilities are simply not going to cope with the additional load. Overall the proposal is not in keeping with the village character or legacy.		Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. Traffic and infrastructure have been thoroughly assessed trough updates to transport modelling and the Infrastructure Delivery Plan. These reports identify where upgrades to facilities and services are needed in order to support growth. The Council will continue to work with Essex County Council and the relevant infrastructure providers to ensure projects are delivered in a timely manner.
580	3995	Mrs Caroline Mitchell [580]	100 homes is a concern and will apply to many of the Medium Site Allocations because they will put direct pressure on existing services, amenities, roads etc without attracting the funding to address the already over burdened pressure felt at schools, GP surgeries, pot holed roads etc. I know that smaller building sites will attract some funding but will it be enough to mitigate the impact of 100 new families 2-300 more people in Bradfield. Roads already suffer with the number of cars. Schools are over subscribed , seeing a GP is not easy. How will these challenges be addressed?	Comment	Whilst this representation is noted, traffic and infrastructure have been thoroughly assessed trough updates to transport modelling and the Infrastructure Delivery Plan. These reports identify where upgrades to facilities and services are needed in order to support growth. The appropriate contributions will be secured from developments to support these upgrades, and the Council will continue to work with Essex County Council and the relevant infrastructure providers to ensure projects are delivered in a timely manner.
1350	4012	Prof Mark Lowdell [1350]	The addition of 100 new homes in Bradfield is an unreasltic increase in population to a small sustainable community. The road access via Windmill Road is completely inadequate to cope with the number of heavy lorry movements during development of that site and the same is true of the B1035 which will have to be used to access Bradfield. The 100 new homes are likely to add >300 car movements per day to Windmill Road, Straight Road and the B1035; none of which are sustainable. These roads are already hevily used and too dangerous for cyclists and pedestrians.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. Access to the remaining development proposed on Windmill Road will be decided at the application stage, rather than within the Local Plan. Transport modelling has been updated to inform on what upgrades are needed to support growth in Bradfield. Policies within Chapter 8 of the Local Plan encourage safer pedestrian and cycle routes alongside development.
581	4168	Mrs Sally Webb [581]	this site is unsuitable. Straight Road is being used as a run through from Mistley's new housing developments. It is arable land. The	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes

			school is nowhere near it and the school is full. It will change the character of the village with several hundred new inhabitants increasing the village by about 25-30%; too many houses.		proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. The Council has updated its Infrastructure Delivery Plan to inform on what upgrades are needed to facilities and services to support growth. This includes data on schools and GP surgeries.
581	4179	Mrs Sally Webb [581]	I object to the proposal of extending the village envelope to include the proposal for 100 new homes	Object	Objection noted.
1361	4184	Mr Jonathan Rhys-Lewis [1361]	The proposal has a number of concerning weaknesses; Roads too small and close to existing properties Insufficient local amentities, and no options to expand them Lack of local infrastructure to support such a large scale development - failure and repair costs Poor access to public transport and no services to the station - increase in car use Negative impacts on rural economy, environment and wildlife Increase in environmental pollution from development and more cars High water levels of primarily clay soil - increase in localised flooding Existing and incomplete developments at Mistley and Lawford already	Object	This representation is noted. With regard to infrastructure, the Council has updated its transport modelling and Infrastructure Delivery Plan (IDP) to inform on where upgrades to infrastructure are needed to support growth. This includes assessment of schools, roads, public transport, and sewage. The Council will continue to work with the relevant infrastructure providers to ensure projects are delivered appropriately. Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development Flood risk has been assessed through an updated SFRA. The Council will continue to work with the Environment Agency to ensure any risks are appropriately mitigated within developments.
1376	4217	Mrs Anja Newman [1376]	MSA9: Building almost as many houses in one field as there are in the whole linear village creates a number of issues. Roads around this field are too narrow to support existing traffic, letalone construction traffic/cars that will come with the housing as bus routes are insufficient to get to work/school. Building a large housing estate in a linear village will make integration with existing community difficult. Amenities & village facilities are far from this location, so residents will probably drive, further adding to traffic. Roads are full of potholes as it is.	Comment	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on what upgrades are needed to facilities and services to support growth. This includes data on schools, roads and GP surgeries.
1376	4234	Mrs Anja Newman [1376]	Roads around this field are too narrow to support existing traffic, letalone construction traffic/cars that will come with the housing. Bus routes are insufficient to get to work in many towns. No train station or bus link to station. Building a large housing estate in a linear village	Comment	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to

			will make integration with existing community difficult. Amenities & village facilities are far from this location, residents will probably drive, further adding to traffic. Roads are too narrow and in poor condition to already increased traffic due to existing local housing developments. Traffic at peak times is already dangerous and very busy.		Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on what upgrades are needed to facilities and services to support growth. This includes data on schools, roads and GP surgeries.
1261	13709	Neil Guild [1261]	I wish to formally object to the proposed allocation of Site MSA9 - Land south of Windmill Road and east of Straight Road, Bradfield, for development of approximately 100 dwellings within the Local Plan. There are concerns regarding the impact of the development on traffic and road safety, public transport provision in Bradfield, the impact on agricultural land and open countryside, and scale and character of the proposed development. The Council should consider smaller-scale, dispersed developments across a range of locations to reduce the concentrated impact on infrastructure, traffic, and the rural environment.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on what upgrades are needed to facilities and services to support growth. This includes data on schools, roads and GP surgeries.
1260	13733	Lisa Hibberd [1260]	I wish to object to the proposed allocation of Site MSA9 - Land south of Windmill Road and east of Straight Road, Bradfield in the Local Plan for development of approximately 100 dwellings. Traffic on Windmill Road and Straight Road are concerns, and there are no footpaths and limited visibility. Public transport links from Bradfield to nearby towns and villages are limited, so additional homes will only add to traffic in surrounding areas. The scale of growth is disproportionate for a village of this size. The Council should distribute smaller developments across several locations, which would reduce concentrated impacts on traffic, infrastructure, and the rural character of the area. It is unclear whether there is adequate market demand for these houses to begin with. Development would also negatively impact wildlife and rural character in the area. For these reasons, I respectfully object to the allocation of Site MSA9.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on what upgrades are needed to facilities and services to support growth. This includes data on schools, roads and GP surgeries.
1339	13927	Thomas and Kathryn Glover [1339]	The proposed 100-dwelling development at Windmill Road, Bradfield, is disproportionately large and poorly located. It would increase the parish housing stock by around 20%, despite an independently assessed local need for only 8 homes, creating an isolated estate disconnected from the village centre. The site has poor access to amenities, limited public transport, unsafe walking routes, and no	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic

			capacity in local schools, recreation space or community facilities, making residents heavily car-dependent. The deliverability of the stated 30% affordable housing is also uncertain, with no clear evidence of local need or commitment from housing associations, risking homes that do not benefit the community.		incremental pattern of growth in Bradfield and will accommodate the linear character of the village. Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on what upgrades are needed to facilities and services to support growth. This includes data on schools, roads and GP surgeries.
1339	14248	Thomas and Kathryn Glover [1339]	Objection to the proposed Horsley Cross Garden Village and Windmill Road development, citing severe infrastructure, transport, healthcare and education constraints. Roads, rail services, GP practices and schools are already at capacity and cannot absorb the scale of growth proposed. The developments would result in unsustainable car dependency, loss of high?-quality agricultural land, biodiversity harm and unresolved water supply issues. The scale of growth is disproportionate to local need, damaging to community identity and unsupported by evidence of demand. The proposals are unsound, unsustainable and harmful to existing rural communities.	Object	In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village. This decision will reduce the total net dwellings allocated to Bradfield by 25. This change will better align with the historic incremental pattern of growth in Bradfield and will accommodate the linear character of the village. Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on what upgrades are needed to facilities and services to support growth. This includes data on schools, roads and GP surgeries.

MSA9 Land south of Windmill Road and east of Straight Road, Bradfield

Summary of Representations

A mix of representations have been submitted regarding MSA9. Several representations proposed alternative sites, arguing that the current site will have too large an impact on the local area and is too far away from facilities and services. Bradfield Parish Council discussed the number of homes proposed proportionate to the current dwelling numbers in Bradfield, and argued that the increase in population will lead to infrastructure capacity issues. Members of the public had similar concerns, citing issues with the impact on wildlife, transportation, infrastructure, village character, and flood risk. One representation supported the allocation and stated that it is well located and able to contribute to affordable housing locally.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA9 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs. In response to concerns from Bradfield Parish Council and members of the public, the Council has decided to reduce the number of homes proposed on site MSA9 from 100 to 20 and add two smaller sites across the village to ensure a more balanced dispersion of growth for this particular settlement, having regard to its current size and organic form. This decision will reduce the total net dwellings allocated to Bradfield by 25.

MSA10 Land south of Weeley Road, Great Bentley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
148	14520	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Medium Site Allocation contains areas of the site at medium and high risk of flood in from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	MSA10 is not located within Flood Zones 2 or 3. However, the Council will continue to work with the Environment Agency on all flood risk matters where appropriate.
Businesses, Landowners and Developers					
705	4123	Mr Peter Le Grys [705]	Site unrelated and too remote from village centre with inadequate facilities and appropriate access to represent a sustainable location	Object	The Council does not consider this site to be too remote from the village centre. The Infrastructure Delivery Plan and transport modelling have been updated to inform on where upgrades to facilities and services are needed to support growth. The Council will continue to work with the relevant infrastructure providers to ensure projects are delivered appropriately.
853	6975	Taylor Wimpey [853]	In conclusion, the evidence demonstrates that Land South of Weeley Road, Great Bentley (MSA10) represents a wholly appropriate, sustainable and deliverable location for new housing within the Draft Local Plan. The Site forms a logical continuation of the recently approved and now implemented residential development to the west, enabling a coherent pattern of growth that respects the settlement's form while supporting the long-term vitality of Great Bentley. As a Rural Service Centre with strong accessibility to services, facilities and public transport, Great Bentley is well placed to accommodate proportionate growth, and the allocation of MSA10 will help reinforce the role of the village as a key local hub for surrounding rural communities.	Support	This is noted.
Community Representatives					
Members of the Public					
1352	4086	Mrs Paula Bland [1352]	Gt Bentley cannot cope with any more large developments. The school and doctors surgery are oversubscribed. The roads are clogged and there is nowhere to park a vehicle.	Comment	This representation is noted. The Council has updated its Infrastructure Delivery Plan, which sets out the necessary infrastructure to support development. The Council has also updated its transport modelling, which will set out the appropriate road infrastructure in the District.

581	4169	Mrs Sally Webb [581]	Arable land should be left to grow crops	Object	Objection noted. As set out elsewhere due to the increase housing targets set by central Government the Council has little other choice but to look at allocation arable land adjacent to or well located in proximity to existing settlements for housing development.
955	14080	Mr Christopher Morris [955]	My comments on the SHLAA proposals in Great Bentley relate to concerns about increased traffic and parking pressures in the village centre, particularly near the railway line and primary school. Significant recent development has already led to increased congestion and safety issues, especially around key facilities and junctions. Further sites located away from the centre are likely to increase car use, whereas those within walking distance may have less impact. There is also concern that preferred sites suggested by the Parish Council may not reflect wider community views, as demonstrated by previous objections and local feedback.	Comment	This representation is noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on where upgrades are needed in support of new housing allocations. This includes facilities and services, such as roads and railways. The Council will continue to work with the relevant infrastructure providers to ensure projects are delivered appropriately.
1622	14186	Kay Hurrell [1622]	There are concerns about housing proposals in Great Bentley, with regard to severe traffic and parking problems around the village centre, particularly near the primary school and station area, which already pose safety risks. Congestion is driven by on-street parking, not through traffic. Development south of the railway on Plough Road would be better due to proximity to key facilities, and opposes sites on Weeley Road and east of Heckfords Road because of distance, increased car use, unsuitable rural roads, and impacts on landscape and wildlife. The Parish Council's site preference is questioned as unrepresentative.	Comment	This representation is noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on where upgrades are needed in support of new housing allocations. This includes facilities and services, such as roads and railways. The Council will continue to work with the relevant infrastructure providers to ensure projects are delivered appropriately. Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development.

MSA10 Land south of Weeley Road, Great Bentley

Summary of Representations
Representations included a mix of support and objections. The Environment Agency recommended the site be informed by a level 2 SFRA. Objections to the policy argued the site is too remote from the village centre and has inadequate facilities and access. Other objections disagreed with development on arable land and expressed concerns regarding the local wildlife. One representation expressed support for the site, commenting that MSA10 is appropriate and sustainable.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA10 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA11 Land west of Parsons Hill, Great Bromley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object. Comment	Council Response
Technical Stakeholders					
6	13479	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Given the proximity of this site to Great Bromley WRC, we would require an odour assessment to be submitted to ensure that sensitive receptors such as future residents on the site are not impacted by odour from our WRC and appropriate mitigation is provided on site, where necessary. Advice on asset encroachment can be found on our website https://www.anglianwater.co.uk/developing/planning--capacity/assetencroachment	Comment	The Council acknowledges Anglian Water's advice regarding the proximity of the site to Great Bromley WRC. Any future planning application would be required to assess potential odour impacts and incorporate appropriate mitigation where necessary. No modification is proposed.
148	14521	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Medium Site Allocation contains areas of the site at medium and high risk of flood in from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	The Council updated its SFRA to inform the site selection process and assess flood risk constraints. Where required, site-specific flood risk assessments and further detailed technical work would be undertaken at the planning application stage to ensure development can be delivered safely and in accordance with national policy. No modification is proposed.
Businesses, Landowners and Developers					
136	4479	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	On behalf of the landowner, this proposed allocation is fully supported. The site has been the subject of a pre-application request and a favourable response has been issued by the Council. Consequently, a planning application is now being prepared for early submission and delivery of the site.	Support	Noted.
136	4483	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	On behalf of the landowner, the two proposed allocations are fully supported. The sites have been the subject of pre-application requests and favourable responses have been issued by the Council. Consequently, planning applications are now being prepared for early submission and delivery of the two sites.	Support	Noted.
Community Representatives					

262	5237	Great Bromley Parish Council (Lizzie Ridout, Clerk) [262]	The two small Great Bromley allocations (10 and 15 homes) lack sufficient local infrastructure, have drainage and flooding issues, and could lead to speculative development; it is requested that any development be proportionate, infrastructure-led and sensitive to the village character.	Comment	Concerns with regard to infrastructure are noted. The Council has updated its Infrastructure Delivery Plan to inform on where infrastructure is needed to support growth, and n updated SFRA and policy safeguards will ensure development is located away from areas at risk of flooding and designed safely. The Local Plan supports development which is sensitive to local character in Chapters 3 and 7.
Members of the Public					
1066	14541	Mr Gavin Tuff-Lacey [1066]	If these are permitted, backland development must be fiercely protected to prevent further sprawl into our rural environment and enclosing homes.	Comment	This representation is noted. Rural character is protected in Chapter 7 of the Local Plan.

MSA11 Land west of Parsons Hill, Great Bromley

Summary of Representations

Representations submitted for MSA11 included a mix of support and comments. Anglian Water highlighted the need for an odour assessment, given the proximity of the site to Great Bromley WRC, and the Environment Agency commented that the site should be accompanied by a level 2 SFRA. One representation argued the allocation lacks sufficient access to local infrastructure, and that there are drainage and flooding issues. Further to this, the representation suggested the allocation should be infrastructure-led, proportionate, and sensitive to village character. Another representation urged the need for the protection of backland development to prevent sprawl into the rural environment.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA11 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA12 Land south of Hall Road, Great Bromley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
136	4480	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	On behalf of the landowner, this proposed allocation is fully supported. The site has been the subject of a pre-application request and a favourable response has been issued by the Council. Consequently, a planning application is now being prepared for early submission and delivery of the sit	Support	Noted.
136	14542	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	On behalf of the landowner, the two proposed allocations are fully supported. The sites have been the subject of pre-application requests and favourable responses have been issued by the Council. Consequently, planning applications are now being prepared for early submission and delivery of the two sites.	Support	Noted.
Community Representatives					
Members of the Public					
1066	14540	Mr Gavin Tuff-Lacey [1066]	If these are permitted, backland development must be fiercely protected to prevent further sprawl into our rural environment and enclosing homes.	Comment	This representation is noted. Rural character is protected in Chapter 7 of the Local Plan.

MSA12 Land south of Hall Road, Great Bromley

Summary of Representations
Representations submitted for MSA12 expressed support for the site. One representation recommended the Council protect back land development to prevent sprawl into the rural environment.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA12 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA13 Land west of Main Road, Great Holland

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
705	4189	Mr Peter Le Grys [705]	See concerns to allocation of two sites either side of Main Road and the ribbon development involved with resultant coalescence of two parts of village.	Object	Unclear what the concerns are that is referred to the summary of the representation however it would appear that the overarching concern relates to coalescence which has been comprehensively covered in response to similar representation below and in relation to MSA14.
726	13652	A H Brown Farms [726]	The site is allocated for 10 dwellings in the DLP. Table LP1 Local Plan Housing Allocations in the DLP indicates that all 10 dwellings could be built between 2025/26 to 2029/30. This reflects the small scale nature of the development, which can be brought forward quicker than large scale strategic sites. Great Holland is a sustainable location, capable of accommodating additional residential development. The proposed allocation of 10 dwellings is supported, however, it is considered that the Site could accommodate a higher number of dwellings, of up to between 30 to 40 dwellings, and respond to need identified to deliver a higher proportion of housing in smaller and medium sized sites. We welcome working with the Council on the potential for additional development at this Site as the plan-making process moves forward. The Site is identified as suitable for residential development in the DLP. The physical characteristics of the site, including its scale, form and relationship with the existing settlement, further support its suitability. It is located within a logical location for new residential dwellings in Great Holland. It provides an opportunity for sustainable growth that would reinforce the village and maintain existing services and facilities. The site remains available for development. There are no known legal, ownership, tenancy or ransom constraints that would restrict delivery. The site is not subject to restrictive covenants or third-party interests that would delay or prevent development. It is also under the single ownership of A H Brown and they are committed to bringing forward the site for development. Accordingly, the site meets the availability requirements of national planning policy and the Council's site assessment methodology. Table LP1 in the DLP confirms the Site is achievable for delivering	Support	Noted.

			development in the next 5 years. Development would be viable and deliverable, with no abnormal infrastructure requirements anticipated. Access can be provided onto Kirby Road using existing local infrastructure, and utilities are available in the vicinity, consistent with its location in Great Holland. Development could be brought forward in a timely manner following allocation and the grant of planning permission.		
Community Representatives					
1163	14085	Cllr Anne and Pierre Oxley [1163]	I formally object to the proposed housing allocations in Walton-on-the-Naze, Frinton, Kirby-le-Soken and Great Holland. The sites fail the Local Plan soundness tests and conflict with national planning policy due to inadequate infrastructure capacity, unsustainable locations reliant on car travel, highway and traffic impacts, flood risk, loss of greenfield land, and harm to community character. The cumulative impacts on services, transport and the environment are not properly assessed, and site deliverability is uncertain. I ask that the scale and location of these allocations be reconsidered before the Local Plan progresses.	Object	The Council does not agree that the Local Plan conflicts with national planning policy. The site has been assessed with considerations to infrastructure, environmental constraints, and job/retail opportunities. In addition to these assessments, the Council has updated its Infrastructure Delivery Plan (IDP), a data-based report which will inform on where infrastructure, such as roads, sewage, and schools are needed to support new development. The Local Plan is supported by a robust evidence base which has been produced in partnership with infrastructure providers, businesses, and all relevant stakeholders. More specifically, site MSA14 has been assessed through the Local Plan evidence base, including sustainability and environmental considerations. Any potential impacts on nearby environmental designations would require detailed assessment and mitigation through the planning application process.
1175	14439	ONTRACK Tendring Transport Users (John Smock) [1175]	The proposed developments here are both reasonably accessible to Kirby Cross station, the main problem being that the route takes one along a very busy road.	Comment	Concerns with regard to traffic on local roads is noted. The Council has updated its transport modelling, which will inform on where upgrades to road and traffic infrastructure are needed to support growth. The Council will continue to work with the relevant infrastructure providers in ensuring these needs are met.
581	4170	Mrs Sally Webb [581]	Small roadside development.	Support	Noted.
1451	13734	Jennifer Jackson [1451]	I am emailing with my objection to MSA 13 and MSA14 re dwellings proposed for Great Holland in particular, and building on open countryside generally. I moved here from Southend as there was so much over development there so that there were hardly any Green spaces left. Do not make the same mistake here. Building on the edge of Main Road and Kirby Road will feel like the start of a ribbon development to be filled in later. I see Egrets and rare diverse birdlife on pastureland from my window including marsh harrier. Also deer and brown hares. We are an important area for wildlife adjoining both country and sea. There is no village school, doctor or shop. Also with previous developments I have not seen any affordable housing so I query how these homes will help local people.. Please also consider the impact of people travelling to use facilities in neighbouring villages and towns which are already oversubscribed.	Object	The Council notes concerns regarding greenspace and the countryside. Whilst the Council agrees that wildlife should be protected, it is important that housing be dispersed across the District, so that the high housing targets set by the Government can be met. Chapter 7 of the Local Plan contains policies which protect biodiversity and rural character. To inform what infrastructure is required alongside this development, the Council has updated its Infrastructure Delivery Plan, a data-driven document which will include where facilities, such as schools, surgeries, and roads, are required to support growth. With regard to housing type, the SHMAA is the document which informs the types of housing needed locally. This is an evidence-based document which considers local demographics, housing markets, and employment. The Local Plan also contains policies which promote affordable housing locally.

1162	14045	Tina Windle [1162]	I understand that there is a proposal to build 10 dwellings in Main Road between 34 Main Road and "After the rain" in Kirby Road. I have been unable to access the plans. As this directly affects us, I'd like to see what is proposed. I feel very strongly that this suggestion should not go ahead. For the following reasons. 1. That particular stretch has trees and daffodils which would be destroyed. Great Holland is particularly lovely in March. The Village looks beautiful at the moment. We would not like to loose the villages character. 2. When we have heavy rain, that particular area has a lot of surface water due to bad drainage (we have even had Ducks on the larger puddles) I feel that the properties could be subject to flooding? 3. I understand that the sewerage and drains were originally constructed in the victorian times. Could you guarantee that with all the properties proposed to be built in Tendering would not result in sewerage going into the sea? 4. The main roads coming into the village are mainly single lane traffic going through Little Clacton (or its by pass Road) then through lanes into the village, or coming through Thorpe le Soken up to Kirby then under the railway bridge up to Great Holland. There would be significant amount of extra traffic with all the proposed development in the area. The roads are already busy. Will there be any bypasses or extra roads planned to accommodate more cars.? Main Road Gt Holland is the route for any traffic coming or going between Walton and Clacton. 5. What measures will be taken to supply extra GP'S, Dentists, Schools, public transport and Shops etc. and can the Hospitals take any more patients? I look forward to hearing your comments and seeing the proposed plans.	Comment	The Council has carefully considered the range of concerns raised, including flood risk and infrastructure An updated SFRA and policy safeguards will ensure development is located away from areas at risk of flooding and designed safely. With regard to infrastructure, the IDP identifies required upgrades, to be secured through planning obligations and phasing. Engagement with the relevant infrastructure providers, such as Anglian Water, ensures capacity and phasing are addressed. With regard to access and traffic, the Council has updated its transport modelling to inform on where additional roads and junctions are needed to support growth. The Council recognises the sensitivity of the location but considers that, with mitigation, the allocation represents a sustainable and necessary component of the housing strategy, consistent with national policy.
1259	14123	Robert and Susan Newton [1259]	We object to the extension of the development boundary along the B1032 in both Kirby Road (MSA14) and Main Road (MSA13), in each of which it is proposed to allow 10 houses. These would remove two long-established and cherished green gaps in the otherwise solid ribbon development through the village. They provide extensive views across open farmland that give users of the road welcome respite from the solid lines of development that have unfortunately extended throughout many parts of the Tendring district and are detrimental to both residents and the many visitors attracted to the area by the prospect of a glimpse of our traditional open spaces.	Object	Whilst this representation is noted, there has not previously been a designated strategic green gap where MSA13 and MSA14 are located. The Council acknowledges that these developments are on greenfield land, however, these sites are not included in the Strategic Green Gap Study and was not identified as fulfilling that role through the Council's Strategic Green Gap Study. Open spaces continue to be protected within Chapter 7 of the Local Plan With regard to access and traffic, the Council has updated its transport modelling to inform on where additional roads and junctions are needed to support growth. The Council understands the need to ensure these developments are supported by the adequate infrastructure.

			They would also create 20 new access points to a road that has become increasingly busy and hazardous over recent years and would thus add to the potential for accidents.		

MSA13 Land west of Main Road, Great Holland

Summary of Representations
Representations submitted for MSA13 included a mix of support and objections. Support for the allocation argued that the site is deliverable, suitable, and available for development. Objections to MSA13 stated the site has inadequate infrastructure capacity, environmental constraints, and will impact the local character of the area.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA13 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA14 Land east of Kirby Road, Great Holland

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
705	4126	Mr Peter Le Grys [705]	Will merely allow the coalescence of the two parts of the settlement creating an inappropriate ribbon of housing.	Object	Coalescence of settlements within the District is prevented through Policy PPL6, which protects Green Gaps. However, MSA14 is nestled in between the (current) two Settlement Development Boundaries of Great Holland, and thus, the Council does not view this allocation as coalescence between two different settlements.
726	13658	A H Brown Farms [726]	The site comprises approximately 0.7 ha of agricultural land. It lies to the east of Great Holland, which is a village located in a sustainable location to the south west of Walton-on-the-Naze and north east of Clacton-on-Sea. The site lies in a parcel of land that is well enclosed and spatially well related to the existing village, with residential dwellings to the west, north and south. To the east of the site is agricultural land. The site is accessible via Main Road (B1032) and the site benefits from very good visibility in both directions. Main Road provides connections to Kirby Cross to the north and Holland-on-Sea to the south. The site is located adjacent to the Great Holland settlement boundary and draft allocations. The site is within a Safeguarding Sand/Gravel Area, but this does not render it fundamentally unsuitable for residential development, accounting for the size of the site it is not likely to be practical to extract mineral. The Site does not contain any designated heritage assets. The site is within flood zone 1, where there is a low risk of fluvial flooding. The majority of the site is also at low risk of surface water flooding. The Site is not subject to any environmental, ecological, heritage or landscape designations that suggest it would be unsuitable for residential development. The landowner has confirmed that the scale and layout of development is flexible and discussions with the Council would be welcomed. As part of the Call for Sites consultation, the Site was assessed as unsuitable for residential development. However, it is considered that the site is suitable for residential development having regard to its location adjacent to the settlement boundary and existing residential dwellings. It provides an opportunity for growth that	Comment	These comments with consideration of the site are noted.

			would reinforce the village. The site is capable of delivering high-quality residential development that respects the established character of Great Holland while making efficient use of land in a sustainable location. The physical characteristics of the site, including its scale, form and relationship with the existing settlement, further support its suitability. The site is well-related and well connected to the built up area of Great Holland. The site is capable of delivering high-quality residential development that respects the established character of Great Holland, while making efficient use of land in a sustainable location. The Site is available for development. There are no known legal, ownership, tenancy or ransom constraints that would restrict delivery. There are no known legal, ownership, tenancy or ransom constraints that would restrict delivery. The site is not subject to restrictive covenants or third-party interests that would delay or prevent development. It is also under the single ownership of A H Brown and they are committed to bringing forward the site for development. Accordingly, the site meets the availability requirements of national planning policy and the Council's site Development would be viable and deliverable, with no abnormal infrastructure requirements anticipated. Access can be provided using existing local infrastructure, and utilities are available in the vicinity, consistent with its location adjacent to the established settlement. Development could be brought forward in a timely manner following allocation and the grant of planning permission.		
705	14543	Mr Peter Le Grys [705]	See concerns to allocation of two sites either side of Main Road and the ribbon development involved with resultant coalescence of two parts of village.	Object	Coalescence of settlements within the District is prevented through Policy PPL6, which protects Green Gaps. However, MSA14 is within the Settlement Development Boundaries of Great Holland, and thus, the Council does not view this allocation as coalescence between two different settlements.
Community Representatives					
1163	14086	Cllr Anne and Pierre Oxley [1163]	I formally object to the proposed housing allocations in Walton-on-the-Naze, Frinton, Kirby-le-Soken and Great Holland. The sites fail the Local Plan soundness tests and conflict with national planning policy due to inadequate infrastructure capacity, unsustainable locations reliant on car travel, highway and traffic impacts, flood risk, loss of greenfield land, and harm to community character. The cumulative impacts on services, transport and the environment are not properly assessed, and site deliverability is uncertain. I ask that the scale and location of these allocations be reconsidered before the Local Plan progresses.	Object	The Council does not agree that the Local Plan conflicts with national planning policy. The site has been assessed with considerations to infrastructure, environmental constraints, and job/retail opportunities. In addition to these assessments, the Council has updated its Infrastructure Delivery Plan (IDP), a data-based report which will inform on where infrastructure, such as roads, sewage, and schools are needed to support new development. The Local Plan is supported by a robust evidence base which has been produced in partnership with infrastructure providers, businesses, and all relevant stakeholders. More specifically, site MSA14 has been assessed through the Local Plan evidence base, including sustainability and environmental considerations. Any potential impacts on nearby environmental designations would

					require detailed assessment and mitigation through the planning application process
1175	14440	ONTRACK Tendring Transport Users (John Smock) [1175]	The proposed developments here are both reasonably accessible to Kirby Cross station, the main problem being that the route takes one along a very busy road.	Comment	Concerns with regard to traffic on local roads is noted. The Council has updated its transport modelling, which will inform on where upgrades to road and traffic infrastructure are needed to support growth. The Council will continue to work with the relevant infrastructure providers in ensuring these needs are met.
Members of the Public					
1060	3805	Mr Thomas Sandy [1060]	MSA14 Land east of Kirby road - 10 houses. 16 March 2026 I have taken my hand written representation to your council offices in station rd today. I gave it to your receptionist [redacted]. I have had a problem with the drafts disappearing over night. The summary just adds another level of frustration. Thank you	Object	The Council apologises for any confusion which may have occurred during the consultation process. The Local Plan review aims to be as accessible as possible for all residents by providing multiple methods of submitting representations.
1380	4222	Mr Joe Rowe [1380]	I object to the Tendring Local Development Plan due to critical infrastructure deficits. Current roads are in disrepair, and more residents will paralyze already congested routes. The district lacks sufficient GP surgeries, dentists, schools, and a local police station. Increasing traffic on the main through-road to Clacton is dangerous. In Great Holland, frequent speeding causes accidents at the village green bend, where cars crash into the children's play area hedge. Without traffic calming, increased volume risks fatalities. Furthermore, MSA14 lacks a public sewer; the existing ditch is insufficient for new foundations and runoff, risking severe flooding and destroying wildlife corridors.	Object	Concerns with regard to local infrastructure are noted. The Council has recently updated its Infrastructure Delivery Plan to inform on where infrastructure, such as schools, sewage, surgeries, police and roads, are needed to support growth. The Council will continue to work with infrastructure providers, such as Essex County Council and the NHS/ICB, to ensure the adequate facilities are delivered alongside new developments.
1451	13735	Jennifer Jackson [1451]	I am emailing with my objection to MSA 13 and MSA14 re dwellings proposed for Great Holland in particular, and building on open countryside generally. I moved here from Southend as there was so much over development there so that there were hardly any Green spaces left. Do not make the same mistake here. Building on the edge of Main Road and Kirby Road will feel like the start of a ribbon development to be filled in later. I see Egrets and rare diverse birdlife on pastureland from my window including marsh harrier. Also deer and brown hares. We are an important area for wildlife adjoining both country and sea. There is no village school, doctor or shop. Also with previous developments I have not seen any affordable housing so I query how these homes will help local people.. Please also consider the impact of people travelling to use facilities in neighbouring villages and towns which are already oversubscribed.	Comment	The Council notes concerns regarding greenspace and the countryside. Whilst the Council agrees that wildlife should be protected, it is important that housing be dispersed across the District, so that the high housing targets set by the Government can be met. Chapter 7 of the Local Plan contains policies which protect biodiversity and rural character. To inform what infrastructure is required alongside this development, the Council has updated its Infrastructure Delivery Plan, a data-driven document which will include where facilities, such as schools, surgeries, and roads, are required to support growth. With regard to housing type, the SHMAA is the document which informs the types of housing needed locally. This is an evidence-based document which considers local demographics, housing markets, and employment. The Local Plan also contains policies which promote affordable housing locally.
1060	14008	Mr Thomas Sandy [1060]	Objection to MSA14 - see attached document, handwritten form. Issues include flooding, draining, no footpath and access.	Object	The Council has carefully considered the range of concerns raised, including flood risk and infrastructure

					An updated SFRA and policy safeguards will ensure development is located away from areas at risk of flooding and designed safely. With regard to infrastructure, the IDP identifies required upgrades, to be secured through planning obligations and phasing. Engagement with the relevant infrastructure providers, such as Anglian Water, ensures capacity and phasing are addressed. With regard to access and traffic, the Council has updated its transport modelling to inform on where additional roads and junctions are needed to support growth. The Council recognises the sensitivity of the location but considers that, with mitigation, the allocation represents a sustainable and necessary component of the housing strategy, consistent with national policy.
1259	14124	Robert and Susan Newton [1259]	We object to the extension of the development boundary along the B1032 in both Kirby Road (MSA14) and Main Road (MSA13), in each of which it is proposed to allow 10 houses. These would remove two long-established and cherished green gaps in the otherwise solid ribbon development through the village. They provide extensive views across open farmland that give users of the road welcome respite from the solid lines of development that have unfortunately extended throughout many parts of the Tendring district and are detrimental to both residents and the many visitors attracted to the area by the prospect of a glimpse of our traditional open spaces. They would also create 20 new access points to a road that has become increasingly busy and hazardous over recent years and would thus add to the potential for accidents.	Object	The Council acknowledges concerns regarding the loss of open views and the perception of separation between settlements. However, the land comprising Allocations MSA13 and MSA14 has not previously formed part of a designated Strategic Green Gap and was not identified as fulfilling that role through the Council's Strategic Green Gap Study. Whilst the Council recognises that development will alter the character of the existing outlook, the sites were assessed through the Local Plan evidence base and are considered suitable for allocation. Policies within Chapter 7 of the Local Plan continue to provide protection for important landscape, environmental and open space assets. With regard to traffic and access, the Council updated its transport modelling and supporting infrastructure evidence to assess the impacts of planned growth and identify any necessary improvements to the highway network. Development proposals will be required to demonstrate that appropriate access arrangements and mitigation measures can be provided. No modification is proposed.
1237	14226	Meryl Saunders [1237]	Good morning. I would very much like to take this opportunity to say how sadden i am to hear of Building 10 dwellings opposite to where myself and my husband live of 13 years. Kirby Road has increasing got busier and busier due to the building of houses being built elsewhere so getting out of our drive is impossible at times, how on earth can building even more homes make sense ?? There will be a bad accident one day. The infrastruture is nt here either, most of us are on sespits How is that going to work ??? As for the Nature it seems that really doesn t stand a chance. If you are intent on going ahead, please make sure More Trees, Hedgerow and our crazy speed limit is reduced. To keep Great Holland a more desirable place that it was and should be.	Object	The Council has carefully considered the range of concerns raised regarding traffic, infrastructure, and the natural environment. The Council has updated its Infrastructure Delivery Plan, which identifies required upgrades to be secured through planning obligations and phasing. Transport modelling has also been updated to identify where additional roads and junctions are required to support growth. Concerning the natural environment, the HRA, SANGs provision, and ecological assessments will ensure any impacts from development are mitigated. The Council recognises the sensitivity of the location but considers that, with mitigation, the allocation represents a sustainable and

					necessary component of the housing strategy, consistent with national policy.

MSA14 Land east of Kirby Road, Great Holland

Summary of Representations
Representations for site MSA14 included several objections and comments. Objections to the site stated concerns with regard to settlement coalescence, traffic impacts, flood risk, loss of greenfield land, and impacts on character and the natural environment.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA14 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA15 Land north-east of Wix Road, Great Oakley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
1737	14253	EPC United Kingdom LTD [1737]	EPC United Kingdom Ltd objects to housing allocations MSA15 and MSA16 at Great Oakley, as both sites sit on the boundary of the Bramble Island hazardous substance safeguarding zone, no site-specific policy wording has been provided, and the HSE has not been consulted.	Object	The Council recognises the presence of the Bramble Island hazardous substance safeguarding zone and has included Policy PPL15 to ensure that development proposals within the safeguarded area are subject to the appropriate assessment and consultation requirements. The allocation of Sites MSA15 and MSA16 does not in itself confer planning permission, and any future planning applications would be required to demonstrate compliance with Policy PPL15 and all relevant health and safety requirements, including consultation with the appropriate statutory consultees where necessary. The Council is satisfied that these matters can be appropriately addressed through the development management process and no modification is proposed.
1002	3961	George Thompson Limited [1002]	Our client supports the allocation of site ref. MSA15 in Table LP1 and Policies Map 3 for 50 dwellings to be delivered between 2025 and 2030, but considers that the site has capacity to accommodate a greater quantum of development, if desirable. Increasing the allocation from 50 to up to 90 dwellings will: ensure that the development makes an efficient use of land; increase TDC's housing supply and make it more robust; and, help to fund new facilities for local people onsite.	Support	Noted.
Community Representatives					
Members of the Public					
1333	3953	Mr Matthew Willis [1333]	B. There is inadequate indication of how health services to cater for allocations in MSA15 and MSA16 in Great Oakley will be achieved. The existing GP practice is unable to adequately cater for the existing population, and its list is closed to new patients. There is a national shortage of GPs, and the plan's suggestions of s106 and CIL provisions are not sufficient to demonstrate that future needs can be met	Object	Concerns regarding healthcare capacity in relation to Sites MSA15 and MSA16 are noted. The Council's updated Infrastructure Delivery Plan assessed the infrastructure required to support planned growth, including healthcare provision, and identified delivery mechanisms and funding requirements. Where necessary, site-specific mitigation and developer contributions would be secured through the planning application process. No modification is proposed.
581	4171	Mrs Sally Webb [581]	Farm land, the village has few facilities and the doctors surgery is full.	Object	Concern with regard to infrastructure provision on sites MSA15 and MSA16 is noted. The Council has recently updated its Infrastructure Delivery Plan to inform on where infrastructure, such as schools, surgeries, and roads, are needed to support growth. The Council will continue to work with infrastructure providers, such as Essex County Council and the NHS/ICB, to ensure the adequate facilities are delivered alongside new developments and through appropriate planning mechanisms such as section 106 contributions towards healthcare.

1326	13724	Judy and Des White [1326]	We are writing to formally object to the inclusion of the proposed housing development site adjacent to our property in Great Oakley within the Council's 10-year Local Plan. While we understand the need for housing provision, we have significant concerns regarding the suitability and sustainability of this particular site. This includes impacts on wildlife and biodiversity, infrastructure capacity, sustainability, impact on residential amenity, and a lack of justification for the site allocation. For the reasons outlined above, we strongly object to the inclusion of this site in the Local Plan. I urge the Council to reconsider this allocation and prioritise developments that are supported by appropriate infrastructure, protect local biodiversity, and are better suited to sustainable growth.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on the upgrades needed to support growth. To ensure projects are delivered appropriately, the Council will continue to work with infrastructure providers and the relevant stakeholders.

MSA15 Land north-east of Wix Road, Great Oakley

Summary of Representations

EPC United Kingdom LTD objected to MSA15 due to its proximity to the Bramble Island hazardous substance safeguarding zone and lack of policy wording to address such matters. Other objections argued the site has inadequate facilities and services to support a growing population, and that the site is located on farmland. Further to this, an objection stated the development will have impacts on wildlife, sustainability, and residential amenity, and had a lack of justification. One representation supported the allocation and recommended the allocation increase its dwelling numbers from 50 to 90.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA15 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA16 Land south of Orchard Close, Great Oakley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
1713			Policy MSA16 allocates Land South of Orchard Close, Great Oakley for 50 dwellings (Figure 1). This allocation is strongly supported. The site is well related to the settlement and forms a logical extension to Great Oakley. As set out within previous Call for Sites submissions made by City & Country, the site benefits from being unconstrained in planning terms. It is visually very well contained by existing housing in Hamford Drive, Orchard Close and School Road to the north-west of the site. In sustainability terms it also benefits from being situated opposite to All Saints C of E Great Oakley Primary School. At a scale of 50 dwellings, the site has the benefit of being delivered in the short term, which will boost housing supply within the District. (See attached document)	Support	Noted.
1737	14254	EPC United Kingdom LTD [1737]	EPC United Kingdom Ltd objects to housing allocations MSA15 and MSA16 at Great Oakley, as both sites sit on the boundary of the Bramble Island hazardous substance safeguarding zone, no site-specific policy wording has been provided, and the HSE has not been consulted.	Object	The Council recognises the presence of the Bramble Island hazardous substance safeguarding zone and has included Policy PPL15 to ensure that development proposals within the safeguarded area are subject to the appropriate assessment and consultation requirements. The allocation of Sites MSA15 and MSA16 does not in itself confer planning permission, and any future planning applications would be required to demonstrate compliance with Policy PPL15 and all relevant health and safety requirements, including consultation with the appropriate statutory consultees where necessary. The Council is satisfied that these matters can be appropriately addressed through the development management process and no modification is proposed.
Community Representatives					
Members of the Public					
1333	3953	Mr Matthew Willis [1333]	B. There is inadequate indication of how health services to cater for allocations in MSA15 and MSA16 in Great Oakley will be achieved. The existing GP practice is unable to adequately cater for the existing population, and its list is closed to new patients. There is a national shortage of GPs, and the plan's suggestions of s106 and CIL provisions are not sufficient to demonstrate that future needs can be met	Object	Concerns regarding healthcare capacity in relation to Sites MSA15 and MSA16 are noted. The Council's updated Infrastructure Delivery Plan assessed the infrastructure required to support planned growth, including healthcare provision, and identified delivery mechanisms and funding requirements. Where necessary, site-specific mitigation and developer contributions would be secured through the planning application process. No modification is proposed.
581	4172	Mrs Sally Webb [581]	Farm land should not be used for housing	Object	Objection noted. Due to the Governments increased housing numbers the council has little other choice but to allocate farmland close the existing settlements for housing development.

1326	13725	Judy and Des White [1326]	We are writing to formally object to the inclusion of the proposed housing development site adjacent to our property in Great Oakley within the Council's 10-year Local Plan. While we understand the need for housing provision, we have significant concerns regarding the suitability and sustainability of this particular site. This includes impacts on wildlife and biodiversity, infrastructure capacity, sustainability, impact on residential amenity, and a lack of justification for the site allocation. For the reasons outlined above, we strongly object to the inclusion of this site in the Local Plan. I urge the Council to reconsider this allocation and prioritise developments that are supported by appropriate infrastructure, protect local biodiversity, and are better suited to sustainable growth.	Object	The allocation aligns with the overall spatial strategy and has been assessed against sustainability objectives through the preparation of the Local Plan. Infrastructure and transport matters do not indicate that development of the site would be unacceptable. No modification is proposed.

MSA16 Land south of Orchard Close, Great Oakley

Summary of Representations
Representations for MSA16 included a mix of support and objections. Support for the allocation stated site is unconstrained with regard to planning terms, and that the site is deliverable in the short term. EPC United Kingdom objected to the site due to its proximity to the Bramble Island hazardous substance safeguarding zone and the lack of policy wording to address this concern – these concerns have been covered above. Other objections argued there is inadequate infrastructure to support the allocation, and that the site will impact wildlife, sustainability, and residential amenity. Further to this, a representation argued the site is not justified.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA16 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA17 Land north of Walton Road, Kirby-le-Soken

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
705	4133	Mr Peter Le Grys [705]	This is a site proposed by myself on behalf of the land owner. A scheme is currently being prepared and likely to be submitted this spring. There are no highway or landscape issues involved. It is a sustainable site close to all local facilities and amenities.	Support	Support is noted.
705	4190	Mr Peter Le Grys [705]	See support towards allocation of site north of Walton Road.	Support	Support is noted.
Community Representatives					
1163	14087	Cllr Anne and Pierre Oxley [1163]	I formally object to the proposed housing allocations in Walton-on-the-Naze, Frinton, Kirby-le-Soken and Great Holland. The sites fail the Local Plan soundness tests and conflict with national planning policy due to inadequate infrastructure capacity, unsustainable locations reliant on car travel, highway and traffic impacts, flood risk, loss of greenfield land, and harm to community character. The cumulative impacts on services, transport and the environment are not properly assessed, and site deliverability is uncertain. I ask that the scale and location of these allocations be reconsidered before the Local Plan progresses.	Object	The Council does not agree that the allocation is inconsistent with national policy. The allocation aligns with the overall spatial strategy and has been assessed against sustainability objectives through the preparation of the Local Plan. Infrastructure and transport matters do not indicate that development of the site would be unacceptable. No modification is proposed.
1175	14445	ONTRACK Tendring Transport Users (John Smock) [1175]	This is one area in the Frinton & Walton township that is not convenient for a railway station. In addition bus services are rather limited and need improvement, but a recent very welcome improvement has been the introduction of an hourly Sunday service between Walton and Clacton via Kirby-le-Soken.	Comment	The Council acknowledges that there are few public transportation opportunities near the allocation. The Council has updated its transportation modelling and will continue working with infrastructure providers and relevant stakeholders to identify opportunities for public transportation.
Members of the Public					
1307	13708	Teresa Dwight [1307]	Development in and around Kirby is inappropriate due to the lack of infrastructure services, the potential impacts on wildlife, and the disproportionate scale of housing. Such overdevelopment contradicts the Local Plan's protection of green space and will negatively impact the local community.	Object	The Council does not agree that the allocation is inconsistent with environmental policies. The site has been assessed through the Local Plan evidence base, including sustainability and environmental considerations. Any potential impacts on nearby environmental designations would require detailed assessment and mitigation through the planning application process. No modification is proposed.
1183	13746	Jackie Crane [1183]	I attended the above village meeting where it was estimated 150 residents turned up to speak out and show as well as my own disgust against plans for 660 homes on greenfield land in our village. Following a speech from a resident wherby it was directly asked if we wanted more houses there was a unanimous show of hands and I was one of those residents inidcating "NO". I object to these plans and I urge Tendring Council to remove the development proposal, protect the green gap between the two villages and to undertake ecological and infratructure assessment.	Object	Objection to the site allocation is noted. The Council understands the concerns expressed by the local community. However, the Council has chosen to take an approach which disperses housing across the District to meet high housing targets set by the Government. The site has been assessed through the Local Plan evidence base, including sustainability and environmental considerations. No modification is proposed.
1190	13852	Vicky Hackett [1190]	It would be a crime to build more homes in this area, the roads are narrow and winding and there is also major housing projects already under way in the Elm Tree Avenue area and Finches Park, as someone who uses this route regularly it is already a difficult journey. There is also no infrastructure e.g	Comment	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the

			schools, doctors, leisure facilities to take on extra families. It could be said that these facilities would come at a later date, but this just does not happen, a good example is the Abigail Gardens near Shorefields School, Holland Road, many bungalows were built over, I believe, two phases but no infrastructure ever came to light. Soon the Clacton area will be part of Colchester as more and more land is taken up with the building of more properties. Why not look around at all the empty properties in the area and bring them up to a liveable standard, e.g a property near to me was sold 6.5 years ago and no one has lived in it although work is done on it albeit on an irregular basis.		local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development Although the Council support regeneration efforts, specific improvements to homes locally is not within the remit of the Local Plan. The Council has updated its Infrastructure Delivery Plan to inform on where upgrades to infrastructure are necessary to support growth. The Council will continue to work with the relevant infrastructure providers to ensure projects are delivered appropriately.
1188	13940	Martin Berryman [1188]	I believe no development should take place north of the Kirby-le-Soken to Walton Church road because it sits beside the highly protected Hamford Water NNR/SAC/SPA/Ramsar. The land near Walton Road is also a high-flood-risk zone and too close to SSSI habitat. Building here would damage wildlife, increase disturbance to nesting and overwintering birds, and restrict natural mammal and bird movement. Extra homes would worsen traffic through Kirby-le-Soken, and the proposed access north of Walton Road is unsafe due to poor visibility and its position near the Halstead Road junction.	Object	The Council does not agree that the Local Plan conflicts with national planning policy. The site has been assessed with considerations to infrastructure, environmental constraints, and job/retail opportunities. In addition to these assessments, the Council has updated its Infrastructure Delivery Plan (IDP), a data-based report which will inform on where infrastructure, such as roads, sewage, and schools are needed to support new development. The Local Plan is supported by a robust evidence base which has been produced in partnership with infrastructure providers, businesses, and all relevant stakeholders. More specifically, site MSA17 has been assessed through the Local Plan evidence base, including sustainability and environmental considerations. Any potential impacts on nearby environmental designations would require detailed assessment and mitigation through the planning application process.
1105	13951	Mrs Sue Mclauchlan [1105]	Objection due to serious safety, infrastructure and community impacts. Frinton Road is the only through route and already unsafe, with limited pavements, no crossings, and severe congestion that routinely brings the area to a standstill, delaying emergency services. Drainage and sewers are at capacity, roads are deteriorating, and utilities are unreliable amid ongoing works. Local GP services are overstretched and further growth would worsen access to care. The development would also destroy valued wildlife habitats and green space. Thorpe is already over-populated, and additional large-scale development would irreversibly damage the village's safety, infrastructure, character and quality of life.	Object	Concerns regarding road infrastructure are noted. The Council has updated its Infrastructure Delivery Plan and transport modelling to inform on where upgrades to facilities and services, such as local GP services and sewers, are needed to support growth. This includes assessments on the capacity of roads, such as Frinton Road. The Council will continue to work with infrastructure providers, such as Essex Highways, to ensure upgrades are delivered as necessary. Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development.
1188	14099	Martin Berryman [1188]	We are writing with concerns about inadequate rainwater drainage if the Kirby Cross development and the 20 dwellings planned north of Walton road are approved. We have attached the draining system currently in place which has serviced	Comment	This representation is noted. The Council has updated its Water Cycle Study to inform on where upgrades to drainage facilities and sewage infrastructure are needed. The SFRA has also been updated to inform on where flood risk is present in the District. The Council will continue to work with the relevant infrastructure providers to ensure capacity is kept

			the village for many years but since the construction of Finches Park at the top of Halstead road and gardens being paved over for parking, the road at the lower end has seen excess water flow and flooding. Please find the attached map depicting flow of excess water. A. Water flows down Halstead road on the surface and underground. B. Its then piped under ground through no3 The Street to an open ditch C. Then the open ditch continues around the field earmarked for the development of 20 properties. D. This is where it goes through pipes under the ground of adjacent properties to Malting Lane.E. The pipework goes under the road across to a large open ditch which carries it out to the Backwaters in front of the Kirby tip. The location of the 20 dwellings being proposed has the added danger of flooding from sea and is considered a flood risk. We have attached the location of the under water springs which also flow down from Kirby Cross. Many of the land drains have been broken over the years due to construction which must be taken into account to the amount of water passing along inadequate draining systems.		available locally and upgrades are completed as necessary. Please see Chapter 7 for more information on drainage and environmental concerns.
1338	14119	Diana and Ray Kemp [1338]	We write to express our concern about the proposed planning recommendations for Kirby Cross and Kirby-le-Soken. We recently attended a meeting when the reasons for the need of a new area plan were explained, and whilst we have sympathy with the council's view we cannot agree with the proposals being suggested. It would appear that more housing is required throughout the country and, of course, it is only right that this area plays its part, but not to the detriment of its current residents and those to follow. There has already been a sharp increase in new housing without adequate infrastructure in place to cope with increased numbers. Road access to this area is limited and any change to this would seem unlikely. Medical and educational services would undoubtedly be inadequate for a further large increase in population. Work opportunities locally are also very limited. Is there any guarantee that funds would be made available to provide sufficient improvements to the infrastructure prior to any building commencing? It seems to us that sacrificing yet more countryside for building (SAH2) on such a large scale cannot be justified simply to meet Government targets. The community deserves better and over development should not be an option. It is also disappointing to note the proposals for Kirby-le-Soken, in particular building along Walton Road (MSA17). Building further houses accessing an already busy road is not ideal. It seems that Kirby-le-Soken is slowly creeping to join Walton. It's important that our villages keep their identity for the benefit of the whole area.	Comment	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. The Council has updated its Infrastructure Delivery Plan and transport modelling to understand where upgrades to facilities and services, such as GP surgeries and schools, are needed to support growth. Funding for improvements will be secured at the application stage of the planning process through developer contributions, and the Council will continue to work with the relevant infrastructure providers to ensure projects are delivered in a timely manner. This particular site is not in the strategic green gap. Moreover, the current Strategic Green Gap between Kirby-le-Soken and Walton will continue to be protected within the Local Plan to prevent coalescence of the two settlements. Please see Chapter 6 of the Local Plan for policies which seek to expand employment opportunities in the District.

			We hope that further consideration will be given to the Planing Policy and a reduction in house quantity be made.		
1088	14188	Mr Mick Hanley [1088]	Allocating MSA17 is unsound due to its proximity to the Coastal Protection Belt, its contribution to harmful ribbon development along Walton Road, and its erosion of the rural setting of Kirby-le-Soken. Previous appeal decisions only permitted three dwellings under very specific screening and scale conditions that cannot justify a 10-unit scheme. The site is environmentally sensitive, visually exposed and subject to access constraints that could require hedgerow loss, undermining landscape policies. Cumulatively with nearby sites, MSA17 would intensify ribboning. Given housing surpluses elsewhere, the site is neither necessary nor justified.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development The Strategic Green Gap between Kirby-le-Soken and Walton will continue to be protected within the Local Plan to prevent coalescence of the two settlements.
593	14200	Mrs Angela S. Hillier [593]	The response raises multiple concerns about proposed housing sites. Several rely on single-track roads with no pavements, particularly off Malting Lane, which could require road widening, disrupt access to the local tip, increase fly-tipping, and place pressure on waste facilities. Increased traffic on Kirby Road would worsen existing congestion, especially at the Walton/Frinton Road junction and during frequent roadworks. Concerns are also raised about building on land formerly within the Coastal Protection Belt, including potential flood risk. Large developments on farmland would reduce food production and harm farming viability. There should be genuinely affordable homes for local people and mandatory, meaningful solar panel provision on all new homes. The previous letter outlines issues relating to infrastructure, including a lack of doctors, banks, public transportation, and roads. Infrastructure must be upgraded to cope with development.	Comment	Concerns regarding traffic and congestion are understood. The Council has updated its transport modelling and Infrastructure Delivery Plan to inform on where upgrades to facilities and services are needed to support growth. This includes capacity assessments of all local roads, such as Walton/Frinton Road and nearby junctions. Whilst it is understood this allocation is near to the Coastal Protection Belt, the site has been assessed for flood risk through an updated SFRA. The Council will continue to work with the Environment Agency and other relevant partners to ensure developments mitigate any risk. Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development
1693	14406	Mr J Sillet [1693]	MSA17 should be removed from the Plan due to its negative visual, ecological and strategic impacts. Development would erode a key hedgerow frontage that defines Kirby-le-Soken's rural character and separation from Walton. This boundary is important for landscape, village identity and conservation principles. The site also raises unresolved ecological concerns given nearby protected areas. As a small allocation, it offers limited planning benefits while causing disproportionate harm, making it unjustified compared to better-planned, larger alternatives.	Object	Concerns regarding the natural environment and local character are noted. Whilst the Council notes construction and increased developments will impact the local environment, this development is necessary in order for the Council to meet Government mandated housing targets. Due to the local landscape of the District, most growth must take place on greenfield land, which can often also be agricultural land. Policies throughout Chapter 7 of the Local Plan seek to mitigate adverse effects as a result of development. The Strategic Green Gap between Kirby-le-Soken and Walton will continue to be protected within the Local Plan to prevent coalescence of the two settlements.
1288	14536	Jules Young [1288]	I am writing to formally object to the scale, strategy and site selection of the proposed residential developments within the Frinton, Walton and Kirby area.	Object	This objection is noted. Concerns relating to infrastructure capacity, including healthcare services, education provision, drainage and utilities, are acknowledged. The Local Plan is supported by an Infrastructure

			While I recognise the need for housing delivery, I strongly object to the overall quantum of development proposed for what is, in reality, a small coastal community with limited infrastructure capacity. Sewerage and drainage capacity, Road network and traffic congestion, Healthcare provision, School places. Environmental impact.		Delivery Plan (IDP), which identifies the infrastructure required to support planned growth. Policy MSA17 will require appropriate mitigation measures and contributions to ensure that impacts are addressed in accordance with national policy and the relevant planning tests. Issues relating to traffic, emergency access and local road capacity are also recognised and will be assessed in detail, with suitable mitigation secured as part of any future planning application. Potential impacts on drainage, flooding and wastewater infrastructure, as well as on ecological interests, have been considered through the supporting evidence base and will be subject to further detailed assessment at the planning application stage, where necessary mitigation and improvements will be secured. The Council considers that, subject to these safeguards, the scale of development proposed is appropriate and can be accommodated in a planned and sustainable manner.

MSA17 Land north of Walton Road, Kirby-le-Soken

Summary of Representations

The Council notes support for the allocation and does not consider it to conflict with national or environmental policy. The site has been assessed through the Local Plan evidence base, including sustainability, environmental, infrastructure and transport considerations, and is considered capable of being developed in a planned and sustainable manner. Concerns regarding traffic, infrastructure capacity, flooding, drainage, ecology, landscape character, loss of agricultural land and potential settlement coalescence are acknowledged; however, updated transport modelling, the Infrastructure Delivery Plan, Water Cycle Study and SFRA inform the Council's position that these matters can be appropriately mitigated through plan policies, developer contributions and the planning application process. The Strategic Green Gap will remain protected, and no modification to the allocation is proposed.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA17 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing needs.

MSA18 Land north of Kirby-le-Soken Evangelical Church, Kirby-le-Soken

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
148	14522	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Medium Site Allocation contains areas of the site at medium and high risk of flood in from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	The Officers have decided to remove the MSA18 site from the Draft Local Plan – see below for reasons.
Businesses, Landowners and Developers					
705	4135	Mr Peter Le Grys [705]	No indication how access is to be provided having regard to the narrow and awkward arrangements.	Object	Objection is noted. The Officers have decided to remove the MSA18 site from the Draft Local Plan – see below for reasons.
Community Representatives					
1163	14088	Cllr Anne and Pierre Oxley [1163]	I formally object to the proposed housing allocations in Walton-on-the-Naze, Frinton, Kirby-le-Soken and Great Holland. The sites fail the Local Plan soundness tests and conflict with national planning policy due to inadequate infrastructure capacity, unsustainable locations reliant on car travel, highway and traffic impacts, flood risk, loss of greenfield land, and harm to community character. The cumulative impacts on services, transport and the environment are not properly assessed, and site deliverability is uncertain. I ask that the scale and location of these allocations be reconsidered before the Local Plan progresses.	Object	All comments and objections noted. The site is not considered suitable for allocation due to significant unresolved highway concerns identified by Essex County Council, including matters relating to site access, highway safety and the achievement of appropriate visibility splays from Halstead Road. The constraints identified are such that no proportionate or deliverable mitigation strategy has been demonstrated. In the absence of evidence confirming that these issues can be satisfactorily addressed, there is insufficient certainty that the site can be delivered.
1175	14446	ONTRACK Tendring Transport Users (John Smock) [1175]	This is one area in the Frinton & Walton township that is not convenient for a railway station. In addition bus services are rather limited and need improvement, but a recent very welcome improvement has been the introduction of an hourly Sunday service between Walton and Clacton via Kirby-le-Soken.	Comment	
Members of the Public					
1386	4249	Mr Luke Bailey [1386]	OBJECTION TO MSA18, Land north of Kirby-le-Soken Evangelical Church. This site is not suitable for development. Not only is the land part of the coastal protection belt, it also has extremely poor/dangerous access. It cannot be accessed from Malting Lane as this is a privately owned single track Lane. The residents are responsible for maintaining the road. It is not acceptable to expect the residents to pay for maintenance, for in excess of an additional 40 cars plus, beforehand, all the construction traffic. This lane is already at capacity and dangerous.	Object	All comments and objections noted. The site is not considered suitable for allocation due to significant unresolved highway concerns identified by Essex County Council, including matters relating to site access, highway safety and the achievement of appropriate visibility splays from Halstead Road. The constraints identified are such that no proportionate or deliverable mitigation strategy has been demonstrated. In the absence of evidence confirming that these issues can be satisfactorily addressed, there is insufficient certainty that the site can be delivered.

1418	4381	Mrs Nicola Webster [1418]	SUMMARY:- For the reasons set out above, including: • The unresolved flood risk and Coastal Protection Belt inconsistencies • The failure to demonstrate compliance with the Sequential and Exception Tests • The increased risk of drainage and surface water impacts • The wholly unsuitable and unsafe access arrangements Site MSA18 is unsound, fails to comply with the NPPF, and represents an inappropriate and potentially unsafe location for residential development. I respectfully request that Tendring District Council removes this site from the Local Plan.	Object	
1423	4394	Mr Jonathan Webster [1423]	Summary: - For the reasons set out above, including: • The unresolved flood risk and Coastal Protection Belt inconsistencies • The failure to demonstrate compliance with the Sequential and Exception Tests • The increased risk of drainage and surface water impacts • The detrimental impact on nature, biodiversity, and the rural environment • The wholly unsuitable and unsafe access arrangements Site MSA18 is unsound, fails to comply with the NPPF, and represents an inappropriate and potentially unsafe location for residential development. I respectfully request that Tendring District Council removes this site from the Local Plan.	Object	
1186	13427	Alan Binks [1186]	We strongly urge that this site ceases to be earmarked in the Local Plan for housing development! The government's quest to build 300,000 houses in a year assured that brownfield and "grey belt" land would be prioritised for development along with a review of green belt boundaries. Why is it now considered appropriate to include Coastal Protection zones? The site is currently designated as being within the "Coastal Protection Zone". It is adjacent to Hamford Water which is a flood plain inlet formed by the Naze at Walton on the Naze. It also lies immediately to the west of Horsey Island. The area is part of the East Atlantic Flyway, with Hamford Water acting as a "Flyway Services Station" for migrating birds who stop off on their migration journey to feed and rest. The east Atlantic Flyway is also on the UK tentative list of UNESCO World Heritage sites, the government having agreed that the landscape is of outstanding universal value. The excess artificial lighting from 20 houses and street lights adjacent to Hamford water and Horsey Island will have a negative effect on the field's ecosystem and	Object	

			nocturnal wildlife. The consequent decline in insect population by additional artificial lighting will negatively impact upon the birds that stop off for feeding. There will also be a risk to future pollination by the lack of insects. The access provision to the site for housing is totally inadequate. There is a right of way over the land we own for occasional access to maintain the field. Permanent access to a housing development by residents, and construction traffic, would constitute a significant intensification and who would want to commit to buying a house where the access is over someone else's private land?		
1307	13707	Teresa Dwight [1307]	Development in and around Kirby is inappropriate due to the lack of infrastructure services, the potential impacts on wildlife, and the disproportionate scale of housing. Such overdevelopment contradicts the Local Plan's protection of green space and will negatively impact the local community.	Object	
1055	13838	Mrs Sue Johnston [1055]	Objection to redefining the Kirby le Soken Settlement Development Boundary to include site MSA18. The site is unsustainable, conflicts with policies SPL1, SPL2 and LP8, and lies outside the existing boundary within the Coastal Protection Belt. Kirby le Soken is a small rural settlement reliant on other towns, with no proven housing need and existing vacant new builds. The proposal is speculative, harms rural character, and risks setting a precedent for backland development. Access arrangements raise serious highway, pedestrian safety, privacy and heritage concerns, particularly near the Conservation Area and listed assets.	Object	
1190	13853	Vicky Hackett [1190]	It would be a crime to build more homes in this area, the roads are narrow and winding and there is also major housing projects already under way in the Elm Tree Avenue area and Finches Park, as someone who uses this route regularly it is already a difficult journey. There is also no infrastructure e.g schools, doctors, leisure facilities to take on extra families. It could be said that these facilities would come at a later date, but this just does not happen, a good example is the Abigail Gardens near Shorefields School, Holland Road, many bungalows were built over, I believe, two phases but no infrastructure ever came to light. Soon the Clacton area will be part of Colchester as more and more land is taken up with the building of more properties. Why not look around at all the empty properties in the area and bring them up to a liveable standard, e.g a property near to me was sold 6.5 years ago and no one has lived in it although work is done on it albeit on an irregular basis.	Comment	
1298	13923	Tracey, Terry, and Natasha White [1298]	There are serious concerns about the scale and impact of proposed developments on Kirby Cross and Kirby-le-Soken. The schemes would harm the environment, biodiversity, and flood resilience, while worsening traffic, road safety, noise and pollution on unsuitable country lanes. The developments would overwhelm already stretched local services, including GP surgeries, schools, drainage, electricity networks and public transport. Residents fear loss of village character, increased danger for pedestrians, and damage to homes from construction traffic. There is a question regarding housing need, deliverability, and infrastructure capacity; perhaps growth should be focused in more suitable locations with proper roads and services rather than small villages.	Object	

1298	13924	Tracey, Terry, and Natasha White [1298]	There are serious concerns about the scale and impact of proposed developments on Kirby Cross and Kirby-le-Soken. The schemes would harm the environment, biodiversity, and flood resilience, while worsening traffic, road safety, noise and pollution on unsuitable country lanes. The developments would overwhelm already stretched local services, including GP surgeries, schools, drainage, electricity networks and public transport. Residents fear loss of village character, increased danger for pedestrians, and damage to homes from construction traffic. There is a question regarding housing need, deliverability, and infrastructure capacity; perhaps growth should be focused in more suitable locations with proper roads and services rather than small villages.	Object	
1105	13952	Mrs Sue Mclauchlan [1105]	Objection due to serious safety, infrastructure and community impacts. Frinton Road is the only through route and already unsafe, with limited pavements, no crossings, and severe congestion that routinely brings the area to a standstill, delaying emergency services. Drainage and sewers are at capacity, roads are deteriorating, and utilities are unreliable amid ongoing works. Local GP services are overstretched and further growth would worsen access to care. The development would also destroy valued wildlife habitats and green space. Thorpe is already over-populated, and additional large-scale development would irreversibly damage the village's safety, infrastructure, character and quality of life.	Object	
593	14201	Mrs Angela S. Hillier [593]	The response raises multiple concerns about proposed housing sites. Several rely on single-track roads with no pavements, particularly off Malting Lane, which could require road widening, disrupt access to the local tip, increase fly-tipping, and place pressure on waste facilities. Increased traffic on Kirby Road would worsen existing congestion, especially at the Walton/Frinton Road junction and during frequent roadworks. Concerns are also raised about building on land formerly within the Coastal Protection Belt, including potential flood risk. Large developments on farmland would reduce food production and harm farming viability. There should be genuinely affordable homes for local people and mandatory, meaningful solar panel provision on all new homes. The previous letter outlines issues relating to infrastructure, including a lack of doctors, banks, public transportation, and roads. Infrastructure must be upgraded to cope with development.	Comment	
1693	14404	Mr J Sillet [1693]	MSA18 should be removed due to unresolved access and safety issues and harm to village character. Safe access is unlikely without damaging a protected tree or creating conflicts at a key junction, while alternative access via a narrow rural lane would erode its character. The site lies within the historic core, where development would harm the Conservation Area's low-density form, views and spaciousness. It offers limited wider benefits and is better suited to remain open land or green infrastructure, making the allocation unjustified and ineffective.	Object	
1288	14537	Jules Young [1288]	I am writing to formally object to the scale, strategy and site selection of the proposed residential developments within the Frinton, Walton and Kirby area. While I recognise the need for housing delivery, I strongly object to the overall quantum of development proposed for what is, in reality, a small coastal	Object	

			community with limited infrastructure capacity. Sewerage and drainage capacity, Road network and traffic congestion, Healthcare provision, School places. Environmental impact.		

MSA18 Land north of Kirby-le-Soken Evangelical Church, Kirby-le-Soken

Summary of Representations
All representations noted – MSA18 has been removed from the Regulation 19 Local Plan for summarised reasons set out above.

MSA19 Land west of Manningtree Road, Little Bentley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					

MSA19 Land west of Manningtree Road, Little Bentley

Summary of Representations
N/A

MSA20 Land south of Shop Road, Little Bromley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
1710	13623	National Grid (Kevin Roeton, Senior Consents Manager (Onshore Planning)) [1710]	There are several proposed allocations located in close proximity to the Project's Order Limits, as follows: - Housing Allocation MSA20: Land south of Shop Road, Little Bromley, which proposes 17 dwellings. - Strategic Allocation – Mixed Use Allocation SAMU9: Horsley Cross Garden Village, which proposes a housing led mixed use development including up to 6,000 dwellings across plan periods. - Strategic Allocation – Mixed Use Allocation SAMU8: Hare Green Garden Village, which proposes a housing led mixed use development including up to 4,500 dwellings across plan periods. National Grid acknowledges that there is no direct interaction between the above sites and the Norwich to Tilbury Project. We would request that we are kept informed of any changes to these proposed site boundaries. There should be no reason why the allocations referred cannot be successfully developed alongside the Norwich to Tilbury Project. However, in order to ensure that this is the case and that developers are aware of the matters to consider when developing in proximity to overhead lines, National Grid strongly recommends that the relevant policies refer to both the Electricity Safety, Quality and Continuity Regulations 2002 and National Grid's Design Guidelines for Development Near Pylons and High Voltage Overhead Power Lines which will assist the developers in this regard. In addition to this National Grid is willing to meet with both the LPA and the site developers to discuss the development of the sites to ensure a mutually beneficial outcome.	Comment	National Grid has confirmed that there is no direct interaction between the allocation and the Norwich to Tilbury Project (which at the time of writing this remains unconsented) and raises no objection in principle to the site's development. The Council notes National Grid's advice regarding development in proximity to overhead electricity infrastructure and will consider whether reference to relevant guidance and safety requirements is necessary within the supporting policy framework.
Businesses, Landowners and Developers					
134	13689	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The allocation of this land is strongly supported. The site has few constraints and is proportionate to the size of Little Bromley. It is of a scale that could be delivered relatively quickly by a small or medium sized developer.	Support	Noted.
Community Representatives					
270	14561	Little Bromley PC	Little Bromley is a small, dispersed rural parish with:	Object	This objection is noted.

		(Dawn Sauka, Clerk) [270]	-No footpaths -No street lighting -No mains sewerage -Limited potable water supply (half the village remains on wells) -No village hall, school, shop, surgery or other amenities -A road network already operating at capacity and unsafe for pedestrians The proposal for a 17 home estate in a village centre of only 50 existing dwellings is wholly disproportionate and would irreversibly damage the rural character that residents overwhelmingly value. Our emerging Neighbourhood Plan-developed with extensive community engagement-supports small scale, sensitively integrated development, typically 1-2 dwellings per site, avoiding estatestyle layouts and preserving the parish's distinctive dispersed pattern. The Document's proposals directly contradict this evidence based local policy work. The Emerging Neighbourhood Plan Provides a Sound, Locally Supported Alternative. Little Bromley's Neighbourhood Plan supports sustainable, small scale growth that: -Maintains the dispersed, low density settlement pattern -Avoids estatestyle layouts or clusters of more than two homes -Protects open views, hedgerows and dark skies -Prioritises affordable homes for local people, selfbuild, ecohomes and downsizing opportunities -Uses materials and design that reflect rural character This is a positive, constructive, community led approach to growth. It aligns with national policy, protects local character, and meets identified local needs. The Local Plan Review ignores this entirely.		The Council understands concerns with regard to rural character. However, in order to meet the high housing targets set by the Government, the Council has chosen an approach which disperses the required housing across the District. This includes allocations within smaller settlements, such as Little Bromley. Following an analysis of infrastructure capacity, environmental constraints, employment and retail opportunities, and other factors, the Council has decided Little Bromley is capable of taking on a smaller allocation of homes within its boundaries. With that being said, Officers have decided to decrease the number of dwellings from 17 to 10 on the site to better reflect the rural context of Little Bromley. In addition, the allocation's amendment, the Council has updated its Infrastructure Delivery Plan (IDP) to inform on where additional infrastructure is needed to support such growth. This includes an analysis of sewage, water supply, schools, surgeries, roads, and other amenities. The Council will continue to work proactively with infrastructure providers to ensure this infrastructure is provided as needed. Similarly, the Council has undertaken transport modelling to inform where roads and other methods of travel can be provided alongside new development. Whilst the Council will also continue to collaborate with Parish and Town Councils, as well as their respective Neighbourhood Plans, the Local Plan has been informed by a robust evidence base, in partnership with infrastructure providers, businesses, and other stakeholders. The Council agrees that housing should be sensitive to the local character and environment of the area, as set out in Policy SPL3 and policies throughout Chapter 7. Please see Chapter 3 and Chapter 7 for more information.
Members of the Public					
1449	4466	Mr Lloyd Bellett [1449]	There should not be the first phase of an housing estate in little Bromley the new dwellings should be scattered around the village. We have no pathways or amenities to support more houses. We will have enough construction upheaval with the trenching and pylons and enough is enough.	Object	This objection is noted. The Council understands concerns with regard to rural character. However, in order to meet the high housing targets set by the Government, the Council has chosen an approach which disperses the required housing across the District. This includes allocations within smaller settlements, such as Little Bromley. Following an analysis of infrastructure capacity, environmental constraints, employment and retail opportunities, and other factors, the Council has decided Little Bromley is capable of taking on a smaller allocation of homes within its boundaries.
700	3757	Mrs Christine Barrett [700]	I strongly object to the proposed development of 17 new homes in Little Bromley	Object	This objection is noted.

813	3923	Louise Joplin [813]	Little Bromley has no mains drainage, with many houses relying on well water, no useful footpaths, no shop, poor public transport links, no facilities and a redundant church, so not suitable for further development. 17 extra houses would contribute very little to the Council's overall housing target but would have a huge negative impact on the character of this small rural village with a population currently of just 255 residents. Brownfield sites in urban areas such as Clacton or Harwich would surely be much more suitable where housing is much more in demand.	Object	This objection is noted. The Council understands concerns with regard to rural character. However, in order to meet the high housing targets set by the Government, the Council has chosen an approach which disperses the required housing across the District. This includes allocations within smaller settlements, such as Little Bromley. Following an analysis of infrastructure capacity, environmental constraints, employment and retail opportunities, and other factors, the Council has decided Little Bromley is capable of taking on a smaller allocation of homes within its boundaries. With that being said, Officers have decided to decrease the number of dwellings from 17 to 10 on the site to better reflect the rural context of Little Bromley. In addition, the allocation's amendment, the Council has updated its Infrastructure Delivery Plan (IDP) to inform on where additional infrastructure is needed to support such growth. This includes an analysis of sewage, water supply, schools, surgeries, roads, and other amenities. The Council will continue to work proactively with infrastructure providers to ensure this infrastructure is provided as needed. Similarly, the Council has undertaken transport modelling to inform where roads and other methods of travel can be provided alongside new development.
751	3978	Mrs Sarah Lodge [751]	I object in the strongest terms to the proposed 17 new dwellings in Little Bromley. This is a tiny village, where most residents aren't on mains sewerage or gas. There is no need for any more housing here, which will change the fabric of the village forever.	Object	This objection is noted. This objection is noted. The Council understands concerns with regard to rural character. However, in order to meet the high housing targets set by the Government, the Council has chosen an approach which disperses the required housing across the District. This includes allocations within smaller settlements, such as Little Bromley. Following an analysis of infrastructure capacity, environmental constraints, employment and retail opportunities, and other factors, the Council has decided Little Bromley is capable of taking on a smaller allocation of homes within its boundaries. With that being said, Officers have decided to decrease the number of dwellings from 17 to 10 on the site to better reflect the rural context of Little Bromley. In addition, the allocation's amendment, the Council has updated its Infrastructure Delivery Plan (IDP) to inform on where additional infrastructure is needed to support such growth. This includes an analysis of sewage, water supply, schools, surgeries, roads, and other amenities. The Council will continue to work proactively with infrastructure providers to ensure this infrastructure is provided as needed. Similarly, the Council has undertaken transport modelling to inform where roads and other methods of travel can be provided alongside new development.
1453	4469	Mr Iain Lyons [1453]	This village is too small to support so many new houses (this is a 30% increase in house numbers). There is no mains sewerage, no mains gas. There is no infrastructure to support so many new homes. This is a small rural and the planned development will	Object	This objection is noted. This objection is noted. The Council understands concerns with regard to rural character. However, in order to meet the high housing targets set by

			transform little Bromley to the size of a small town. This will be detrimental to the local wildlife, tranquility and farmland that will suffer permanently if this plan goes ahead.		the Government, the Council has chosen an approach which disperses the required housing across the District. This includes allocations within smaller settlements, such as Little Bromley. Following an analysis of infrastructure capacity, environmental constraints, employment and retail opportunities, and other factors, the Council has decided Little Bromley is capable of taking on a smaller allocation of homes within its boundaries. With that being said, Officers have decided to decrease the number of dwellings from 17 to 10 on the site to better reflect the rural context of Little Bromley. In addition, the allocation's amendment, the Council has updated its Infrastructure Delivery Plan (IDP) to inform on where additional infrastructure is needed to support such growth. This includes an analysis of sewage, water supply, schools, surgeries, roads, and other amenities. The Council will continue to work proactively with infrastructure providers to ensure this infrastructure is provided as needed. Similarly, the Council has undertaken transport modelling to inform where roads and other methods of travel can be provided alongside new development.
758	4491	Mrs Sarah Travers [758]	The proposed housing is not suitable for the village. There is no mains drainage or gas supply in the village. The area has a high water table and is subject to flooding. Housing in the village is mostly on one side of the road or the other, not both. There is minimal public transport in the village and no footpath or street lighting where the housing is proposed. Adding 17 homes in a village with approximately 50 in total is wholly disproportionate. The plan also does not take into account the potential National Grid etc infrastructure changes.	Object	This objection is noted. This objection is noted. The Council understands concerns with regard to rural character. However, in order to meet the high housing targets set by the Government, the Council has chosen an approach which disperses the required housing across the District. This includes allocations within smaller settlements, such as Little Bromley. Following an analysis of infrastructure capacity, environmental constraints, employment and retail opportunities, and other factors, the Council has decided Little Bromley is capable of taking on a smaller allocation of homes within its boundaries. With that being said, Officers have decided to decrease the number of dwellings from 17 to 10 on the site to better reflect the rural context of Little Bromley. In addition, the allocation's amendment, the Council has updated its Infrastructure Delivery Plan (IDP) to inform on where additional infrastructure is needed to support such growth. This includes an analysis of sewage, water supply, schools, surgeries, roads, and other amenities. The Council will continue to work proactively with infrastructure providers to ensure this infrastructure is provided as needed. Similarly, the Council has undertaken transport modelling to inform where roads and other methods of travel can be provided alongside new development.
1527	13736	MG Shute [1527]	I oppose the use of the land shown in the local plan being used to provide a further 17 properties in the village. The village has limited infrastructure: water mains do not extend to the site, there is no mains gas or sewage, electricity supply is unreliable, and access relies on septic systems discharging to	Object	This objection is noted. This objection is noted. The Council understands concerns with regard to rural character. However, in order to meet the high housing targets set by the Government, the Council has chosen an approach which disperses the required housing across the District. This includes allocations within

			watercourses. There are no footpaths, play areas, shops, schools, or community facilities, and access to the bus stop, pub, and schools is unsafe, especially at night. The proposed development would increase traffic, flood risk, and pressure on utilities, while harming local amenity and property value. Alternative central village sites would be safer and more sustainable.		smaller settlements, such as Little Bromley. Following an analysis of infrastructure capacity, environmental constraints, employment and retail opportunities, and other factors, the Council has decided Little Bromley is capable of taking on a smaller allocation of homes within its boundaries. With that being said, Officers have decided to decrease the number of dwellings from 17 to 10 on the site to better reflect the rural context of Little Bromley. In addition, the allocation's amendment, the Council has updated its Infrastructure Delivery Plan (IDP) to inform on where additional infrastructure is needed to support such growth. This includes an analysis of sewage, water supply, schools, surgeries, roads, and other amenities. The Council will continue to work proactively with infrastructure providers to ensure this infrastructure is provided as needed. Similarly, the Council has undertaken transport modelling to inform where roads and other methods of travel can be provided alongside new development.
1467	13743	Brett Travers [1467]	We are very much against the proposed 17 house development along Shop Road in Little Bromley. The village will be severely impacted by the proposed infrastructure development for National Grid's Norwich to Tilbury pylon route, notably substations for this project along with associated wind farm project connecting on the edge of the village As residents , we are going to be subjected to disruption, noise and dangers from this for many years. Given the social wellbeing concerns we are already facing, we can't face more development (housing) directly opposite our home. Little Bromley is not a normal residential area now, it is being targeted for industrial projects. Adding housing on top risks overdevelopment and upsetting the fine balance as to why we live in a rural location. Construction impacts are already going to be beyond extreme for villagers, without this additional development.	Object	The allocation has been reduced from 17 to 10 dwellings and remains proportionate to the scale of Little Bromley. Potential impacts associated with separate NSIP proposals are subject to their own assessment and decision-making processes and do not preclude the identification of suitable housing sites through the Local Plan.
814	13751	Kate Hodgkiss [814]	Little Bromley proposal for 17 homes: Little Bromley is a village of approx 100 homes with only around half of those centrally located. Another 17 homes (or could it be 20 homes or 25 homes?) would hugely increase the size of the village. The village has no large-scale developments and housing in the village centre isn't set out in a concentrated manner - with few locations, if any, with housing on both sides of the road. If 17 homes have to be built in the Parish of Little Bromley then there must be a better way - with single dwellings or perhaps 2/3 homes maximum being peppered across the area and using materials that are sustainable in themselves and require sustainable living and transport. Sadly, Little Bromley finds itself at the epicentre of numerous Nationally Significant Infrastructure Project (NSIP) applications	Object	The proposed allocation has been reduced to 10 dwellings, representing a modest addition to the village. The scale of development is considered appropriate to the settlement and has been assessed through the Local Plan process. Whilst the cumulative effects of NSIP proposals are acknowledged, these schemes are subject to separate consenting regimes and do not, in themselves, justify discounting what the Council consider to be an otherwise suitable housing allocation.

			including National Grid, Five Estuaries, North Falls and Tarchon. It cannot be possible at this stage, to assess the cumulative impact that such projects and Tendring Local Plan could have on the area.		
1050	14047	Mr Robert Middleton [1050]	Objection to Local Plan for Little Bromley While I understand that Tendring has been told by the government to build numerous houses in its area I must object to why you have come to the conclusion of where to put these in Little Bromley. 1. The land is owned by a local farmer who, once the proposed Substationsare built, thinks the land will be of no use to him so he might as well profit from this situation. 2. I've noticed that you have moved the settlement boundary from the roadside into the field to accommodate this settlement. It is with this in mind you could move the boundary anywhere in the village and even out the distribution of the new houses. There is land available either side of Harlequin for example or in Chequers Road, Ardleigh Road or even Bentley Road. 3. This is what I consider a very large development for a small village. 17 houses are planned. This would mean at least 34 adults plus children and asthere is no other means of transport in the village, apart from a bus service that runs every two hours, there's a possibility of 34 more cars. This would increase the safety risk for those who already live in the village and have to dodge the fast moving traffic that we already have as they cut through from the A120 to Lawford. There is only one footpath in the middle of the village which is a couple of hundred yards long going from nowhere to nowhere and if you want to walk anywhere else you have to go on the road with the speeding cars. 4. At present there are very few amenities in the village. We have no gas or main sewage in the village so the new development would have to be on cesspit and any clean water would have to use soakaways which will add to the high water table that we already have. This could be troublesome for the houses in the village that are still on well water for their needs. 5. As I said earlier we have a bus service that runs every two hours from Clacton to Mistley and back which is always empty because it's	Object	This objection is noted. This objection is noted. The Council understands concerns with regard to rural character. However, in order to meet the high housing targets set by the Government, the Council has chosen an approach which disperses the required housing across the District. This includes allocations within smaller settlements, such as Little Bromley. Following an analysis of infrastructure capacity, environmental constraints, employment and retail opportunities, and other factors, the Council has decided Little Bromley is capable of taking on a smaller allocation of homes within its boundaries. With that being said, Officers have decided to decrease the number of dwellings from 17 to 10 on the site to better reflect the rural context of Little Bromley. In addition, the allocation's amendment, the Council has updated its Infrastructure Delivery Plan (IDP) to inform on where additional infrastructure is needed to support such growth. This includes an analysis of sewage, water supply, schools, surgeries, roads, and other amenities. The Council will continue to work proactively with infrastructure providers to ensure this infrastructure is provided as needed. Similarly, the Council has undertaken transport modelling to inform where roads and other methods of travel can be provided alongside new development.

			basically of no use so everyone has to have a car. There are no shops in the village and we have a public house that is at the end of the village and as there are no footpaths anywhere near it so you take your life in your hands trying to reach it with all the cars speeding though.		
1498	14191	Lee Smith [1498]	Little Bromley is a small, dispersed rural parish with: -No footpaths -No street lighting -No mains sewerage -Limited potable water supply (half the village remains on wells) -No village hall, school, shop, surgery or other amenities -A road network already operating at capacity and unsafe for pedestrians The proposal for a 17 home estate in a village centre of only 50 existing dwellings is wholly disproportionate and would irreversibly damage the rural character that residents overwhelmingly value. Our emerging Neighbourhood Plan-developed with extensive community engagement-supports small scale, sensitively integrated development, typically 1-2 dwellings per site, avoiding estatestyle layouts and preserving the parish's distinctive dispersed pattern. The Document's proposals directly contradict this evidence based local policy work. The Emerging Neighbourhood Plan Provides a Sound, Locally Supported Alternative. Little Bromley's Neighbourhood Plan supports sustainable, small scale growth that: -Maintains the dispersed, low density settlement pattern -Avoids estatestyle layouts or clusters of more than two homes -Protects open views, hedgerows and dark skies -Prioritises affordable homes for local people, selfbuild, ecohomes and downsizing opportunities -Uses materials and design that reflect rural character This is a positive, constructive, community led approach to growth.	Object	This objection is noted. The Council understands concerns with regard to rural character. However, in order to meet the high housing targets set by the Government, the Council has chosen an approach which disperses the required housing across the District. This includes allocations within smaller settlements, such as Little Bromley. Following an analysis of infrastructure capacity, environmental constraints, employment and retail opportunities, and other factors, the Council has decided Little Bromley is capable of taking on a smaller allocation of homes within its boundaries. With that being said, Officers have decided to decrease the number of dwellings from 17 to 10 on the site to better reflect the rural context of Little Bromley. In addition, the allocation's amendment, the Council has updated its Infrastructure Delivery Plan (IDP) to inform on where additional infrastructure is needed to support such growth. This includes an analysis of sewage, water supply, schools, surgeries, roads, and other amenities. The Council will continue to work proactively with infrastructure providers to ensure this infrastructure is provided as needed. Similarly, the Council has undertaken transport modelling to inform where roads and other methods of travel can be provided alongside new development. Whilst the Council will also continue to collaborate with Parish and Town Councils, as well as their respective Neighbourhood Plans, the Local Plan has been informed by a robust evidence base, in partnership with infrastructure providers, businesses, and other stakeholders. The Council agrees that housing should be sensitive to the local character and environment of the area, as set out in Policy SPL3 and policies throughout Chapter 7. Please see Chapter 3 and Chapter 7 for more information.

			It aligns with national policy, protects local character, and meets identified local needs. The Local Plan Review ignores this entirely.		

MSA20 Land south of Shop Road, Little Bromley

Summary of Representations
Representations for MSA20 included a mix of support and objections. National Grid commented that MSA20 is near to the Norwich to Tilbury Project, and recommended developers are aware of matters to consider when developing in proximity to overhead lines. Rose Builders supported the allocation, stating it has few constraints and is proportionate to the size of the Little Bromley. Objections to the site argued there are no footpaths and street lighting, and cited concerns with regard to infrastructure, the environment, and the justification for the site. Further to these objections, representations also noted the existing impacts from the Norwich to Tilbury project within Little Bromley. A few representations cited the emerging Neighbourhood Plan in Little Bromley and argued the Local Plan ignores this document.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA20 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

MSA21 Land east of Heckfords Road, Great Bentley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
609	3841	Hills Building Group [609]	This proposed medium site allocation on the edge of the Rural Service Centre of Great Bentley for 80 dwellings is supported. This site adjoins a successful mixed-use development completed by Hills Building Group to the south and east. Land east of Heckfords Road is sustainability located in relation to the facilities and services in Great Bentley and Hills Building Group confirm that it can make a positive contribution towards the Council's five year housing requirements.	Support	Support for MSA21 is noted.
Community Representatives					
Members of the Public					
1352	4088	Mrs Paula Bland [1352]	Gt Bentley cannot cope with more house building. The school and doctors surgery are oversubscribed. The roads are clogged and there is no parking in the village. The junctions with the A133 are death traps.	Comment	This representation is noted. With consideration to infrastructure, environmental constraints, employment opportunities, and other factors, it is the Council's view that Great Bentley has the capacity to take on a smaller housing allocation, in order to meet the Government's housing targets. This decision has been informed through the Council's 'Call for Sites' consultation and multiple documents in the Evidence Base. The Council has updated its Infrastructure Delivery Plan (IDP), which sets out where infrastructure such as schools, GPs, and roads, are needed to support growth. In the meantime, the Council will continue to work proactively with infrastructure providers and Essex County Council to ensure these needs are met.
955	14509	Mr Christopher Morris [955]	My comments on the SHLAA proposals in Great Bentley relate to concerns about increased traffic and parking pressures in the village centre, particularly near the railway line and primary school. Significant recent development has already led to increased congestion and safety issues, especially around key facilities and junctions. Further sites located away from the centre are likely to increase car use, whereas those within walking distance may have less impact. There is also concern that preferred sites suggested by the Parish Council may not reflect wider community views, as demonstrated by previous objections and local feedback.	Comment	Although the Council agrees development should be located in areas with sustainable transport network, the ambitious housing targets together with unique localised settlement constraints and historic development patterns sometimes require development to be allocated in locations slightly further away from sustainable transport network(s). Please see Chapter 8 of the Local Plan for more information on active travel policies. This comment with regard to traffic is noted. The Council understands concerns around transportation and traffic in Great Bentley, particularly following new development locally. Transport modelling has been undertaken to inform where new transportation infrastructure is needed to support growth. In the interim, the Council will continue to work with local infrastructure providers as well as Essex Highways to mitigate traffic concerns.

MSA21 Land east of Heckfords Road, Great Bentley

Summary of Representations
Representations submitted for MSA21 included a mix of support and comments. The representation in support of the allocation stated the site can make a positive contribution to the Council's five-year housing requirement. Other comments argued there is a lack of infrastructure capacity to support the site and noted concerns with regard to traffic and parking. One representation argued sites farther away from the centre are likely to increase car usage.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA21 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

MSA22 Haulage Depot, Heath Road, Tendring Green

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					
581	4173	Mrs Sally Webb [581]	sensible	Support	Noted.
1503	14324	Mr Carl Richardson [1503]	Proposed allocation of site MSA22 for residential re-development, comprising 10 dwellings, is supported.	Support	Noted.

MSA22 Haulage Depot, Heath Road, Tendring Green

Summary of Representations
Representations broadly supported MSA22.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA22 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

MSA23 Land at Avocet Place, Thorrington

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
6	13481	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	These sites have sewer pumping stations within/adjacent to their boundaries. There should be at least 15m from the pumping station boundary to the nearest residential curtilage within the site to avoid any odour issues. Further advice can be found on our website https://www.anglianwater.co.uk/developing/planning--capacity/assetencroachment	Comment	The Council notes the requirement that minimum buffer distance of 15 metres should be maintained between the stations and the nearest residential curtilage. This level of detail will be covered at the development management stage.
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					

MSA23 Land at Avocet Place, Thorrington

Summary of Representations
Ony one representation was submitted for MSA23. Anglian water stated there should be at least 15m from the pumping station boundary to the nearest residential curtilage to avoid odour issues on site – this is a matter that will be considered at detailed design stage which forms part of the development management process.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA23 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

MSA24 Land east of Bentley Road, Weeley Heath

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
705	4148	Mr Peter Le Grys [705]	The proposal ignores the recent appeal decision wherein the Inspector concluded the development of this site greatly exceeds the amount of housing proposed for this scale of settlement and conflicts with Policy SPL 2. The size of settlement, its rural location and the low level of services provided, the dwellings would be inappropriate, conflicting harmfully with the policies of the plan. This would have a significant effect on the character and appearance of this semi-rural settlement, which appears to have grown gradually and incrementally. Development of this relatively large scale would detract significantly from the local distinctiveness of this area.	Object	The previous appeal decision is noted. However, that decision related to a different proposal and was made at a time when there was a significantly lower housing requirements than now arising through the Government's revised standard method. MSA24 has been reassessed through the current Local Plan process and up to date supporting evidence base. The Council considers that, at approximately 60 dwellings, the medium sized allocation represents an appropriate contribution towards meeting identified housing needs and can be accommodated without unacceptable harm. No modification is proposed.
Community Representatives					
846	14420	St Osyth Beach Estate Ltd [846]	Supports the allocation of MSA24 as it is a suitable, available and deliverable location for housing performing positively against the key criteria used for site selection. It makes a meaningful contribution to housing supply, scoring positively for its ability to deliver around 75 dwellings, and benefits from strong access to public transport, which is identified as a significant sustainability advantage.	Comment	Noted.
Members of the Public					
703	3637	Mr Jon Barber [703]	Site MSA24 - Subject to a decision by the Planning Inspectorate (dated 24.12.2020) that determined the site unsuitable for development. Whilst the proposed development of 60 dwellings is less than the previous application, the reasons for refusal remain valid a) Weeley Heath as a smaller rural settlement, (lowest sustainability category), b) there would be significant adverse environmental impacts from the proposal c) significant effect on the character and appearance of the locality, the site contributes strongly to the semi-rural character and open setting of the settlement. With other significant developments proposed this site is strongly objected to for development.	Comment	The previous appeal decision is noted. However, that decision related to a different proposal and was made at a time when there was a significantly lower housing requirements than now arising through the Government's revised standard method. MSA24 has been reassessed through the current Local Plan process and up to date supporting evidence base. The Council considers that, at approximately 60 dwellings, the medium sized allocation represents an appropriate contribution towards meeting identified housing needs and can be accommodated without unacceptable harm. No modification is proposed.
526	3738	Mr kevin millar [526]	MSA24 east of Bentley Road has already been rejected by the secretary of state due to it being unsuitable for traffic movement. With houses also proposed for Mill Lane how has the traffic movement changed. Please re look at this and move to a better location on the outskirts of the village.	Object	The Planning Inspectorate appeal did not conclude that the site was unsuitable solely on traffic grounds. The previous decision related to a different proposal and policy context. Highway impacts have been considered through the Local Plan evidence base and would be subject to detailed assessment through any future planning application. No modification is proposed.

1104	3901	Mr Steven Holden [1104]	MSA24 - Bentley Road is already a road in poor condition, with increased traffic, and wide enough only for small vehicles (pavement mounting witnessed). The potential loss of the field ditches would be negligent as they are breeding grounds for a wide range of insect life - i.e. no longer biodiverse. Building on this remaining Heathland represents the loss of a valuable green open space fundamental to a 'small rural settlement'. MSA25 - Mill lane is not a viable 'road' for access. It is no more than an old farm track between fields and does not have a proper foundation.	Object	The concerns regarding highways, biodiversity and loss of open land are noted. The allocation has been assessed through the Sustainability Appraisal and site assessment process. Ecological impacts, drainage infrastructure and highway matters would be considered in detail through any future planning application. No modification is proposed.
1271	3924	Mr Jonathan Cann [1271]	The proposed development represents an unjustified and inappropriate expansion of a smaller rural settlement and directly conflicts with both recent appeal findings and established planning principles. It would result in significant harm to the rural character of Weeley Heath, contribute to urban sprawl, and adversely affect neighbouring amenity.	Object	The Council does not agree that the allocation represents an unjustified expansion of Weeley Heath. The allocation has been assessed against current housing needs, the settlement hierarchy and available evidence. Detailed impacts on neighbouring amenity and the character of the area would be considered through the planning application process. No modification is proposed.
641	3928	P. J. Millar [641]	I wish to object to Site MSA24 at Weeley Heath. I understand the position TDC finds itself in with respect of housing numbers & quotas, but I find it incredible that this site is even being discussed as an option. Planning applications have been refused for over development at this site on numerous occasions by Weeley & Tendring Council. Additionally a separate appeal was launched & dismissed on 24/12/20 by the independent planning inspectorate. (Appeal Ref: APP/P1560/W/20/3254569) All of the reasons that the appeal was dismissed are still entirely valid today. There are far better options than this unsuitable site.	Object	The Council acknowledges the previous planning and appeal history. However, those decisions were taken in a different policy context and prior to the significant increase in housing need generated through the revised standard method. The site has been reassessed as part of the Local Plan Review and remains considered suitable for allocation. No modification is proposed.
1316	3938	Mr Daniel Mcginn [1316]	I strongly object to more houses being imposed in this area of Weeley heath. Thee is no infrastructure in place to accommodate another 60 houses.	Object	Infrastructure capacity has been considered through the Local Plan evidence base and Infrastructure Delivery Plan. The Council is satisfied that the site can accommodate the proposed development and that detailed infrastructure matters can be addressed through the planning application process. No modification is proposed.
1392	4265	Ms Jackie Church [1392]	I object due to the reasons planning was previously denied by TDC, WPC and the planning inspectorate on appeal. No circumstances for which refusal was issued has changed. Bentley Road is totally unsuitable for proposed housing access/extra traffic and Mill Lane is a designated ‘quiet lane’. Mill Lane is already quite perilous with cars when walking (as no footpath) and I have witnessed a car almost hit a small child on a bike. The roads would not take the extra	Object	The previous refusal and appeal decisions are noted. However, the allocation has been assessed against current housing requirements and supporting evidence. Highway and access matters would require detailed consideration through any future planning application and consultation with Essex County Council as Highway Authority. No modification is proposed.

			traffic. Cars often have to mount the pavement in Bentley Road to pass farm vehicle's.		
1167	13699	Mr Keith Tuckwell [1167]	The site MSA24 was refused planning application by both Weeley Parish Council and Tendring District Council under Application Reference 19/01201/OUT in 2020. All the reasons for this refusal remain the same now as they were in 2020. One of the key reasons are the size of the development and Weeley Heath being designated a small rural settlement. Mill Lane would be completely unable to take any extra traffic. Flooding is an issue in the Lane and as such any added development would only make the problem worse.	Object	The Council recognises the planning history of the site. However, previous planning decisions were taken before the current Local Plan Review and under a significantly different housing need position. The site has since been reassessed through the Local Plan process and remains suitable for allocation. Detailed highway, drainage and infrastructure matters would be addressed at planning application stage. No modification is proposed.
1056	13713	Mr Ronald Hayes [1056]	While I recognise the need for new housing, I strongly believe that these particular sites are unsuitable for development due to the significant negative impacts they would have on the local area, infrastructure and environment. Development would place considerable strain on the existing road network, particularly Mill Lane, and surrounding roads are already narrow and frequently congested. This development would also lead to the loss of valuable greenfield land which contributes to the rural character and environment of Weeley Heath. Additional issues involve the local infrastructure, such as public services and parking provision, which may be strained with the proposed housing allocations. For these reasons I respectfully urge the council to reconsider the inclusion of sites MSA24 and MSA25 for residential development and to prioritise alternative locations that are better supported by infrastructure and less harmful to the local environment.	Object	The concerns regarding infrastructure, highways and loss of greenfield land are noted. The allocation has been assessed through the Sustainability Appraisal and supporting evidence base and is considered appropriate in balancing housing needs against site constraints. No modification is proposed.
1518	13760	Emma Bumpstead [1518]	Policy MSA24 is unsound due to unresolvable highway safety, flood risk and environmental constraints. Bentley Road and Mill Lane are narrow rural routes unsuitable for increased traffic, posing serious risks to pedestrians, cyclists and horse riders, with no feasible mitigation due to physical constraints. Development would worsen surface water flooding, destroy the rural "green corridor" character, increase light pollution, and harm biodiversity, with no evidence of achieving net gain. The allocation should be deleted and housing redistributed to sustainable locations with existing infrastructure and safe access.	Object	The Council does not agree that the allocation is unsound. Highway, drainage, flood risk and environmental matters have been considered through the site assessment process and supporting evidence. Detailed technical assessments would be required through any future planning application. No modification is proposed.
1269	13774	Lynne Buxton [1269]	Objection to Site MSA24 at Weeley Heath, noting that repeated planning applications and a 2020 appeal were refused due to unsustainable overdevelopment in a small rural settlement. The appeal findings remain valid, confirming Weeley Heath's low sustainability ranking and policy limits of small-scale infill only. The proposed 66 homes would conflict with adopted policies and past decisions. Concerns include unsafe pedestrian access, narrow roads, heavy vehicle movements, increased car dependency and environmental harm. Alternative sites in larger, more sustainable settlements such as Little Clacton are considered more appropriate.	Object	The previous appeal decision is acknowledged. However, the Council has reassessed the site through the Local Plan Review, taking account of updated evidence and substantially increased housing requirements arising from the revised standard method. The Council continues to consider the site suitable for allocation. No modification is proposed.

1134	13777	Sally Cornish [1134]	The objection opposes development of agricultural land at site MSA24, citing harm to the rural character of Weeley Heath, a small settlement in the lowest sustainability category. Mill Lane is designated a quiet rural lane and would be adversely affected by significant traffic increases. The site was deemed unsuitable for similar development by a Planning Inspector in 2020, and those reasons remain valid. Local roads, GP surgeries and primary schools are already under pressure. Alternative sites with better infrastructure exist nearby, making this allocation unnecessary. The proposal would result in the loss of open countryside without exceptional justification and should therefore be rejected.	Object	The concerns regarding sustainability, infrastructure and previous appeal decisions are noted. The allocation has been assessed against current housing needs and supporting evidence and is considered capable of delivering housing in a sustainable manner. Detailed environmental and highway impacts would be considered through any future planning application. No modification is proposed.
1115	13841	Mrs Tracey Phelan [1115]	I object to the proposed site allocations MSA23 and MSA24 in Weeley Heath due to the cumulative scale of development in a small rural settlement with limited infrastructure. The proposed number of houses would place additional pressure on local roads, schools, and healthcare services, which are already under strain from recent developments.	Object	The Council has considered cumulative growth impacts within Weeley Heath through the Local Plan process. The scale of development proposed is not considered sufficient to justify removal of the allocation and infrastructure matters would continue to be assessed through subsequent planning applications. No modification is proposed.
1321	13851	Brian and Joan Hart [1321]	Bentley Road is already experiencing an increase in traffic, due to the developments in Great Bentley. The constant stream of cars, are using this as a cut through to the main Clacton Road and the speed is a concern, as many residents are elderly. If 60 homes were built in the land east of Bentley Road, not only would it add to the weight of traffic, in either direction including Mill Lane, it would also upset the natural habitat of wildlife, as in the meadow south of Mill Lane. Overall Concerns: Consideration needs to be given to the existing infrastructure and the impact on the Village that is already struggling to meet the needs of existing residents i.e. Mill Lane is a narrow lane unsuitable for large vehicles, lorries & deliveries or construction vehicles. The nearest Doctor's Surgery is in Great Bentley or Thorpe; lack of local Schools; not enough Buses/Public Transport links at adequate times. Weeley Heath is a Heath with open grassland, conservation supporting wildlife, walking & grazing and should remain a protected area.	Object	The concerns regarding traffic, infrastructure, wildlife and the character of Weeley Heath are noted. The allocation has been subject to assessment through the Local Plan evidence base, with detailed ecological, transport and design matters to be addressed through the development management process. No modification is proposed.
1095	13860	Mr Andrew Draper [1095]	Good afternoon, I'm emailing regarding the recent letter residents of Weeley Heath received recently. My email regards the land bordered by Bentley Road and Mill Lane. Are we as residents likely to have more building work carried out on this lovely green space? Bentley Road is a narrow road as it is, and increased traffic would make this already bad road into a very dangerous road. Mill Lane is a designated quiet lane, and kept that way for walkers, both old and young, dog walkers, horse riders, and cyclists etc. I've been unable to comment on the website, and would rather have any comments that I make anonymous. It would be a terrible shame to increase the size of such a delightful and small village, and take away green	Comment	The Council acknowledges concerns regarding the loss of open land and traffic impacts. The allocation has been assessed through the site selection process and is considered an appropriate location for development. Detailed highway and design considerations would be addressed through any future planning application. No modification is proposed.

			areas that people need in the modern world for health and wellbeing, and increased traffic causing dangerous situations.		
1513	13905	Cameron and Kelsey Robson [1513]	Site MSA24 was refused planning permission in 2020, and the reasons for refusal remain valid. Both MSA24 and MSA25 are considered unsuitable for development due to their scale and location within Weeley Heath, a small rural settlement. Access via Mill Lane—a narrow, historic, quiet lane with flooding issues and no pavements or lighting—is inappropriate for increased traffic. Local infrastructure is already stretched, with no spare school capacity, minimal local amenities, and no GP surgery. Additional development would place unsustainable pressure on services and should not be reconsidered.	Comment	The previous planning refusal and appeal decision are noted. However, those decisions were reached under a different policy and housing need context. The site has been reassessed through the Local Plan Review and remains considered suitable for allocation, subject to detailed technical assessment at planning application stage. No modification is proposed.
1635	13966	Howard Jones [1635]	I FEEL IT NECESSARY FOR THE PLANNING INSPECTORATE TO FURTHER UPHOLD THE REFUSAL OF THE DEVELOPMENT OF THIS RURAL LAND. APP/P1560/W/203254569. AND TO REFUSE PERMISSION BASED ON MY FURTHER COMMENTS. THANK YOU. H.M. JONES.	Object	The objection and reference to Appeal APP/P1560/W/20/3254569 are noted. The allocation has been reconsidered through the Local Plan Review process having regard to updated evidence and the District's significantly increased housing requirement. The Council remains satisfied that the site is suitable for allocation. No modification is proposed.
1331	14036	Mrs J.M. Morris [1331]	Have lived opposite the field east of Bentley Rd - MSA24- for 50 years. MILL LANE is designated as a QUIET LANE It wouldn't cope with the proposed amount of TRAFFIC involved in 60 houses also no info structure proposed?	Object	The concerns regarding Mill Lane, traffic and infrastructure are noted. The allocation would not be served solely from Mill Lane and detailed access arrangements would be determined through the planning application process. Infrastructure and highway impacts would be assessed in consultation with relevant statutory bodies. No modification is proposed.
1636	14077	Louise Blake [1636]	A development of 77 homes on Mill Lane (MSA25 and MSA24) is unsuitable because it would overwhelm a single track quiet lane with no pavements. It would also place further strain on local infrastructure. Mill Lane is a designated quiet lane, used by walkers, cyclists and horse riders. It has no pavements and is intended for low-volume, low speed traffic. Traffic from 77 new homes would fundamentally undermine the purpose of this designation and create safety risks to road users. It is also a narrow single-lane road with few passing points. It is not designed to accommodate the substantial increase in traffic this development would create. The site is an open agriculture field that contributes to the rural character of Mill Lane. Building a dense housing estate creates a significant and irreversible loss of countryside not in keeping with the surrounding area. Owls are regularly heard in this area, loss of this greenspace and surrounding hedgerows would destroy valuable habitat. The existing fields absorbs rainwater naturally replacing it with hard surfaces will increase surface-water run off and place pressure on local drainage systems.	Object	The Council recognises concerns relating to traffic, drainage, biodiversity and local services. These matters have informed the site assessment process and would be subject to further detailed technical assessment through any future planning application. No modification is proposed.

			Local Services are already under strain. An additional 77 homes will place further pressure on these essential services.		
1523	14100	Hanna Frizzell [1523]	Objection to the continued inclusion of site MSA24 (Land East of Bentley Road) for the allocation of houses within the Tendring District Local Plan Review. This allocation remains fundamentally unsustainable and directly contradicts previous planning judgments regarding the character and capacity of Weeley Heath.	Object	The Council does not agree that the allocation is unsound. Whilst previous planning decisions are material considerations, they were taken in a different policy context and before the substantial increase in housing need arising from the revised standard method. The site has been reassessed through the Local Plan process and remains considered suitable for allocation. No modification is proposed.
600	14127	Mr Norman and Pauleen Ewins [600]	MSA24 should not be designated as Housing use. Planning application was refused on this land by Weeley Parish and Tendering District Councils and an appeal was refused by the Planning Inspectorate in December 2020. The reasons for refusal have not changed since then and so planning should be refused now. Bentley Road and Mill Lane are not suitable for increased road or construction traffic. Generally - Weeley Heath is designated as a smaller rural settlement and as such has few amenities. There are no medical facilities and residents have to attend GP surgeries in other areas such as Great Bentley. There are no shops with the area having one public house and a Garden Centre. School places would be restricted to Weeley and Little Clacton which are over subscribed. Roads generally in the surrounding area are poorly maintained and increased traffic would only add to the problem. Electricity supply stoppages are frequent and would not be improved.	Object	The previous planning history is acknowledged. However, the allocation has been assessed against current housing needs, site-specific evidence and the wider objectives of the Local Plan Review. Infrastructure and highway matters would be addressed through any future planning application. No modification is proposed.
1329	14131	Julie Wills [1329]	I object to both plans MSA25 and MSA24 because, 1. Mill lane is a one track road with no paths and no lighting. It is a designated quiet lane which is used frequently by dog walkers. 2. The landowner of MSA24 also maintains a ditch between 41 and 43 Mill Lane, who will take responsibitliy for this if the land is sold? 3. Part of Mill Lane have their sewage pumped away so anymore homes would put a strain on this system. 4. Previous planning has been refused many times for MSA 25 and an appeal dismissed by the Independent Planning Inspectorate, so what has changed that this can now be allowed? 5. There has already been development in our area and I feel we do not need to fill in what space we have left with more properties. 6. Bentley Road could not cope with the extra traffic. It has a path one side and the other side slopes towards the ditch. It is difficult to pass with larger vehicles oncoming.	Object	The concerns regarding highways, drainage, infrastructure capacity and previous planning decisions are noted. The Local Plan allocation establishes the principle of development only, with detailed technical matters to be considered through the planning application process. The Council remains satisfied that the site is suitable for allocation. No modification is proposed.

			7. The impact of 77 extra properties and potentially in excess of 100 more vehicles in the small area of Weeley Heath will have a negative effect on our infrastructure, which is already struggling to cope.		
1325	14136	Peter and Jean Spurgeon [1325]	My objections relating to MSA24 and MSA25 regarding overdevelopment of Weeley Heath. These are my reasons for objecting to sites MSA24 and MSA25 1. As Weeley Heath is a designated smaller rural settlement, these developments would change it from rural urban to suburban. 2. Increase in heavy traffic volume will affect Bentley Road and Mill Lane enormously. 3. Lack of infrastructure for these sites e.g. doctors/schools/dentists and hospital. 4. Concern over what type of housing.	Object	The Council considers the allocation to represent an appropriate level of growth having regard to current housing needs and the settlement hierarchy. Matters relating to highways, infrastructure capacity and housing mix would be considered through future planning applications and relevant Local Plan policies. No modification is proposed.
1308	14149	Linda Hanrahan [1308]	The proposal to develop this land is likely to have significant detrimental impact on the local infrastructure. Bordered by a designated quiet lane, in a rural setting, is not suitable for development of this scale. The Planning Inspector determined the site unsuitable for development in Dec 2020.	Object	The previous appeal decision is acknowledged. However, the site has been reassessed through the Local Plan Review having regard to updated evidence, current planning policy and the District's increased housing requirement. The Council remains satisfied that the allocation is justified and deliverable. No modification is proposed.
641	14156	P. J. Millar [641]	I wish to raise an objection to Site MSA24 at Weeley Heath. I understand the position TDC finds itself in with respect of housing numbers & quotas, but I find it incredible that this site is being discussed as an option. Planning applications have been refused for over development at this site on numerous occasions by Weeley Parish council & Tendring District Council. Additionally a separate appeal was launched & dismissed on the 24/12/20 by the independent planning inspectorate. (Appeal Ref: APP/P1560/W/20/3254569) All of the reasons cited in the dismissal of the appeal are still entirely valid to date with the below statement being particularly valid as quoted in the dismissal at points 15 & 16	Object	The Council recognises the site's planning history, including Appeal APP/P1560/W/20/3254569. However, that decision was made prior to the current Local Plan Review and before the significant increase in housing need resulting from changes to the Government's standard method. The site has subsequently been reassessed through the Local Plan evidence base and is considered suitable for allocation. No modification is proposed.
1062	14539	Mr Howard Frizzell [1062]	The proposed allocation of MSA24 is unsound because the site has already been found unsuitable for development at appeal, with fundamental issues relating to sustainability and harm to rural character. Reducing the number of dwellings does not address these core concerns. As no material changes have occurred, the allocation remains unjustified and inconsistent with planning policy.	Object	The Council does not agree that the allocation is unsound. Whilst previous appeal findings remain material considerations, they were made within a different policy and housing need context. The site has been reassessed through the Local Plan Review and supporting evidence and remains considered a suitable and deliverable allocation. No modification is proposed.

MSA24 Land east of Bentley Road, Weeley Heath

Summary of Representations

Representations submitted for MSA24 included several objections and comments. Some representations referenced a recent appeal decision for the site and argued the size of the development is inappropriate and incompatible with the Local Plan. Other objections mentioned poor road conditions locally, and stated concerns with regard to traffic impacts and infrastructure capacity. Further to this, many discussed the potential environmental impacts to Weeley Heath, and the harm to rural character as a result of additional development. A few representations also commented that Mill Lane is a designated quiet lane. Other concerns noted housing type and the justification for the proposal.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA24 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

MSA25 Land south of Mill Lane, Weeley Heath

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					
353	3873	Mr Robert Pomery [353]	The respondents fully support the inclusion of this site as a housing allocation which would be deliverable in the first five years of the plan. The site represents a logical rounding of the settlement with no landscape impacts and is proportionate to the size of the settlement. The land is considered to have a low biodiversity value, and all existing trees on the boundary provide enclosure and will be retained. The development here would suit a local developer using local trades.	Support	Noted.
1271	3925	Mr Jonathan Cann [1271]	Impact on Mill Lane (designated Quiet Lane)? The development borders Mill Lane, a designated Quiet Lane used regularly by pedestrians, dog walkers and horse riders. The Local Plan emphasises the importance of: Safe walking and cycling routes Accessible green infrastructure Protection of amenity spaces and routes () A significant increase in traffic would: Undermine the Quiet Lane designation Increase conflict between vehicles and vulnerable users Harm the safety and tranquillity of the route	Object	The Council recognises the concerns around potential for housing here to alter the character of the area. The allocation is relatively modest in scale and any future planning application would be required to demonstrate that safe and suitable access can be achieved and that impacts on highway safety are acceptable, having regard to all users of the lane, including pedestrians, cyclists and horse riders. No modification is proposed.
1167	13700	Mr Keith Tuckwell [1167]	The site MSA24 was refused planning application in 2020. All the reasons for this refusal remain the same now as they were in 2020. This also applies to MSA25. Mill Lane is a designated QUIET lane, it is a very old single track lane. It only has one passing bay. It has no pavements, no street lighting and no mains sewage in large parts. Mill Lane would be completely unable to take any extra traffic. Flooding is an issue in the Lane and as such any added development would only make the problem worse.	Object	Previous planning decisions related to different proposals at that specific time and must be considered in their specific context. MSA25 has been assessed through the Local Plan site assessment process and supporting evidence base. Matters relating to access, drainage, flooding and infrastructure would be subject to detailed assessment through any future planning application. No modification is proposed.

1056	13715	Mr Ronald Hayes [1056]	While I recognise the need for new housing, I strongly believe that these particular sites are unsuitable for development due to the significant negative impacts they would have on the local area, infrastructure and environment. Development would place considerable strain on the existing road network, particularly Mill Lane, and surrounding roads are already narrow and frequently congested. This development would also lead to the loss of valuable greenfield land which contributes to the rural character and environment of Weeley Heath. Additional issues involve the local infrastructure, such as public services and parking provision, which may be strained with the proposed housing allocations. For these reasons I respectfully urge the council to reconsider the inclusion of sites MSA24 and MSA25 for residential development and to prioritise alternative locations that are better supported by infrastructure and less harmful to the local environment.	Object	The Council recognises concerns regarding highways, infrastructure and loss of greenfield land. The site has been assessed through the Sustainability Appraisal and site assessment process and is considered suitable for the scale of development proposed. Infrastructure and environmental impacts would be considered further at planning application stage. No modification is proposed.
1518	13761	Emma Bumpstead [1518]	Policy MSA25 is unsound due to a lack of evidence and untested impacts. The site was excluded from detailed infrastructure modelling, leaving drainage and highway capacity on Mill Lane unassessed. The narrow, single-track lane is unsuitable for construction traffic or increased vehicle movements, creating serious risks to pedestrians, cyclists and horse riders, with no feasible mitigation. Additional concerns include light pollution, harm to biodiversity, and loss of rural character. The site should be deleted and housing redistributed to fully assessed, sustainable locations with safe access and existing services.	Comment	The Council does not agree that the allocation is unsound. MSA25 has been assessed through the Local Plan evidence base, including consideration of infrastructure, accessibility and environmental constraints. Detailed matters relating to highways, drainage, biodiversity and site design would be addressed through any future planning application. No modification is proposed.
1115	13840	Mrs Tracey Phelan [1115]	I object to the proposed site allocations MSA23 and MSA24 in Weekey Heath due to the cumulative scale of development in a small rural settlement with limited infrastructure. The proposed number of houses would place additional pressure on local roads, schools, and healthcare services, which are already under strain from recent developments.	Object	The Council acknowledges concerns regarding cumulative growth and infrastructure capacity. The proposed allocations in Weeley Heath have been considered against the settlement hierarchy, housing requirements and available evidence. The scale of development is not considered sufficient to warrant removal of the allocation. No modification is proposed.
1321	13850	Brian and Joan Hart [1321]	The entrance for the proposed 17 houses is between a row of bungalows where residents including ourselves, purchased these properties for a quiet retirement, where we are not overlooked and is on a "Quiet Lane". If houses were built in the meadow, not only would they overlook the existing bungalows, any building works would damage the natural habitat of the wildlife including red kites, sparrow hawks, bats, crows, gulls, owls, stotes, squirrels, foxes, hedgehogs & pheasants etc. The Lane is used by pedestrians, mainly dog walkers & horses and there are no footpaths or street lighting.	Object	The concerns regarding privacy, wildlife, access arrangements and local infrastructure are noted. Matters relating to overlooking, ecological impacts, detailed access design and highway mitigation would be considered through the planning application process. The allocation establishes the principle of development only and does not determine the detailed layout of any future scheme. No modification is proposed.

			For vehicles using the Lane, there are no adequate passing points, so they already use the 2 entrances to the bungalows, which is unacceptable & any increase in traffic, will make it worse. In addition, in front of the existing 7 bungalows on Mill Lane, there is a ditch that provides drainage off the land, so provision of adequate passing points would need to be considered elsewhere in the Lane as was omitted from the last developer, & should have been put in place already. Consideration needs to be given to the existing infrastructure and the impact on the Village that is already struggling to meet the needs of existing residents i.e. Mill Lane is a narrow lane unsuitable for large vehicles, lorries & deliveries or construction vehicles. The nearest Doctor's Surgery is in Great Bentley or Thorpe; lack of local Schools; not enough Buses/Public Transport links at adequate times. Weeley Heath is a Heath with open grassland, conservation supporting wildlife, walking & grazing and should remain a protected area.		
1095	13861	Mr Andrew Draper [1095]	Good afternoon, I'm emailing regarding the recent letter residents of Weeley Heath received recently. My email regards the land bordered by Bentley Road and Mill Lane. Are we as residents likely to have more building work carried out on this lovely green space? Bentley Road is a narrow road as it is, and increased traffic would make this already bad road into a very dangerous road. Mill Lane is a designated quiet lane, and kept that way for walkers, both old and young, dog walkers, horse riders, and cyclists etc. I've been unable to comment on the website, and would rather have any comments that I make anonymous. It would be a terrible shame to increase the size of such a delightful and small village, and take away green areas that people need in the modern world for health and wellbeing, and increased traffic causing dangerous situations.	Comment	The comments are noted. The Council recognises the rural character of Mill Lane and the surrounding area. The allocation has nevertheless been assessed as a suitable location for modest residential growth. Detailed transport, design and environmental considerations would be assessed through any future planning application. No modification is proposed.
1513	13906	Cameron and Kelsey Robson [1513]	Site MSA24 was refused planning permission in 2020, and the reasons for refusal remain valid. Both MSA24 and MSA25 are considered unsuitable for development due to their scale and location within Weeley Heath, a small rural settlement. Access via Mill Lane—a narrow, historic, quiet lane with flooding issues and no pavements or lighting—is inappropriate for increased traffic. Local infrastructure is already stretched, with no spare school capacity, minimal local amenities, and no GP surgery. Additional development would place unsustainable pressure on services and should not be reconsidered.	Comment	The Council has considered the characteristics of Mill Lane, local infrastructure and previous planning history through the site assessment process. The allocation is considered suitable in principle, with detailed access, drainage and infrastructure matters to be addressed through any future planning application. No modification is proposed.
1635	13967	Howard Jones [1635]	I FEEL IT NECESSARY FOR THE PLANNING INSPECTORATE TO FURTHER UPHOLD THE REFUSAL OF THE DEVELOPMENT OF THIS RURAL LAND. APP/P1560/W/203254569. AND TO REFUSE PERMISSION BASED ON MY FURTHER COMMENTS. THANK YOU.	Object	The objection and reference to previous planning appeal decisions are noted. Those decisions relate to specific planning applications submitted at that particular time and when the planning landscape and in particular the local housing need, were different. The allocation has been assessed through the Local Plan process having regard to current

			H.M. JONES.		evidence and site circumstances. The Council remains satisfied that the site is suitable for allocation and no modification is proposed.
1247	13981	DG Anthony [1247]	I am writing to protest about the planning permission that has been granted for homes in Mill Road, Weeley Heath. Yet again another dumb decision by Tendring District Coucil with no regard to infrastructure, roads, doctors facilities and road safety. With the increased traffic already unsupported by inadequate provision of the above this will make things and living in the area yet again more difficult.	Object	The concerns regarding local infrastructure, healthcare provision, highways and road safety are noted. These matters have been considered through the preparation of the Local Plan and would be subject to further assessment through any future planning application. No modification is proposed.
819	14002	Ann Barnes [819]	I am writing to protest about the planning permission that has been granted for homes in Mill Road, Weeley Heath. Yet again another dumb decision by Tendring District Coucil with no regard to infrastructure, roads, doctors facilities and road safety. With the increased traffic already unsupported by inadequate provision of the above this will make things and living in the area yet again more difficult. Again councillors are not representing the people they were elected to represent and show a total lack of regard and respect for local people. We shall remember this lack of respect when voting.	Object	The concerns regarding infrastructure capacity, healthcare provision and highway impacts are noted. The Council considers the site capable of accommodating the proposed level of development, subject to the detailed assessment of relevant technical matters through the planning application process. No modification is proposed.
1636	14078	Louise Blake [1636]	A development of 77 homes on Mill Lane (MSA25 and MSA24) is unsuitable because it would overwhelm a single track quiet lane with no pavements. It would also place further strain on local infrastructure. Mill Lane is a designated quiet lane, used by walkers, cyclists and horse riders. It has no pavements and is intended for low-volume, low speed traffic. Traffic from 77 new homes would fundamentally undermine the purpose of this designation and create safety risks to road users. It is also a narrow single-lane road with few passing points. It is not designed to accommodate the substantial increase in traffic this development would create. The site is an open agriculture field that contributes to the rural character of Mill Lane. Building a dense housing estate creates a significant and irreversible loss of countryside not in keeping with the surrounding area. Owls are regularly heard in this area, loss of this greenspace and surrounding hedgerows would destroy valuable habitat. The existing fields absorbs rainwater naturally replacing it with hard surfaces will increase surface-water run off and place pressure on local drainage systems. Local Services are already under strain. An additional 77 homes will place further pressure on these essential services.	Object	The objection is noted. The Council recognises concerns regarding Mill Lane, infrastructure, drainage and biodiversity. The allocation has been subject to assessment through the Local Plan evidence base and any future development proposal would be required to address these matters in detail and demonstrate compliance with relevant planning policies. No modification is proposed.
600	14128	Mr Norman and Pauleen Ewins [600]	MSA25 should not be allowed planning for houses. Houses would overlook existing bungalow properties. An access point has been constructed to this land from Mil Lane. However Mill Lane is a single track road designated by the Council as Quiet Lane with only one	Object	The concerns regarding access arrangements, infrastructure capacity, drainage and local services are acknowledged. These matters would be considered in detail through the planning application process in consultation with the relevant statutory bodies. The Council remains

			passing bay, no pedestrian pavements and no street lighting between the Access road and Bentley Road. It is also in a poor state of repair. There is also no mains sewage for many parts of Mill Lane. Generally - Weeley Heath is designated as a smaller rural settlement and as such has few amenities. There are no medical facilities and residents have to attend GP surgeries in other areas such as Great Bentley. There are no shops with the area having one public house and a Garden Centre. School places would be restricted to Weeley and Little Clacton which are over subscribed. Roads generally in the surrounding area are poorly maintained and increased traffic would only add to the problem. Electricity supply stoppages are frequent and would not be improved.		satisfied that the allocation is appropriate in principle. No modification is proposed.
1329	14132	Julie Wills [1329]	I object to both plans MSA25 and MSA24 because, 1. Mill lane is a one track road with no paths and no lighting. It is a designated quiet lane which is used frequently by dog walkers. 2. The landowner of MSA24 also maintains a ditch between 41 and 43 Mill Lane, who will take responsibitliy for this if the land is sold? 3. Part of Mill Lane have their sewage pumped away so anymore homes would put a strain on this system. 4. Previous planning has been refused many times for MSA 25 and an appeal dismissed by the Independent Planning Inspectorate, so what has changed that this can now be allowed? 5. There has already been development in our area and I feel we do not need to fill in what space we have left with more properties. 6. Bentley Road could not cope with the extra traffic. It has a path one side and the other side slopes towards the ditch. It is difficult to pass with larger vehicles oncoming. 7. The impact of 77 extra properties and potentially in excess of 100 more vehicles in the small area of Weeley Heath will have a negative effect on our infrastructure, which is already struggling to cope.	Object	The objection is noted. The Council recognises concerns relating to Mill Lane, drainage infrastructure, previous planning history and cumulative development impacts. The allocation has been assessed through the Local Plan process and detailed technical matters would be addressed through any future planning application. No modification is proposed.
1325	14137	Peter and Jean Spurgeon [1325]	My objections relating to MSA24 and MSA25 regarding overdevelopment of Weeley Heath. These are my reasons for objecting to sites MSA24 and MSA25 1. As Weeley Heath is a designated smaller rural settlement, these developments would change it from rural urban to suburban. 2. Increase in heavy traffic volume will affect Bentley Road and Mill Lane enormously.	Object	The objection is noted. The Council considers that the proposed allocation represents an appropriate scale of growth consistent with the role of Weeley Heath within the settlement hierarchy. Matters relating to highways, infrastructure provision and housing mix would be considered through the planning application process and relevant Local Plan policies. No modification is proposed.

			3. Lack of infrastructure for these sites e.g. doctors/schools/dentists and hospital. 4. Concern over what type of housing.		

MSA25 Land south of Mill Lane, Weeley Heath

Summary of Representations

The representations submitted for MSA25 were a mix of objections, support and comments, although objections dominate. The representation in support of the allocation commented that the site is deliverable in the first five years of the plan, has no landscape impacts, and is proportionate to the size of the settlement. Objections to the allocation argued that there would be impacts to infrastructure, the environment, and local character. Several representations also noted the allocation would impact Mill Lane and noted that this road is a designated quiet lane. Drainage and housing were also mentioned in objections.

The Council considers MSA25 to be a suitable and sustainable allocation for modest residential growth, having been assessed through the Local Plan site assessment process, Sustainability Appraisal and supporting evidence base. Concerns relating to Mill Lane, highways, drainage, infrastructure capacity, biodiversity, landscape impact, privacy and previous planning decisions are acknowledged, but are considered capable of being addressed through detailed assessment at the planning application stage. The allocation establishes the principle of development only, and no modifications are proposed.

MSA26 Land south of Colchester Road, Wix

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					
581	4174	Mrs Sally Webb [581]	Roadside housing - sensible	Support	Noted.

MSA26 Land south of Colchester Road, Wix

Summary of Representations
One representation was submitted in support of the Allocation.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA26 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

MSA27 Land at Abbey Bottom Farm, Harwich Road, Wix

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
148	14523	Environment Agency (Environment Agency) [148]	The Sequential Test should be informed by an updated Level 1 SFRA. Level 2 SFRA assessments are recommended for sites in Flood Zones 2 and 3 to assess flood hazard, climate change impacts, defence infrastructure, access/egress, and design requirements for safe development. These assessments should also consider flood warning and emergency planning. Additional sites affected by surface water flooding may require Level 2 assessments, and advice should be sought from Essex County Council to identify these and ensure appropriate site-specific analysis is undertaken. This Medium Site Allocation contains areas of the site at medium and high risk of flood in from rivers and the sea (Flood Zones 2 and 3) or with increased areas of the site at risk from rivers and the sea with climate change.	Comment	Following the Regulation 18 consultation, the Council received new information regarding land ownership within MSA27 (Abbey Bottom Farm, Wix). Officers have been provided with evidence that approximately 40% of the proposed allocation site is now in separate ownership and that the owners do not support or intend to pursue residential development of their land. This change in circumstances raises significant concerns regarding the availability and deliverability of the site, including uncertainty over the ability to achieve a comprehensive form of development and secure an appropriate access arrangement. The implications of this information were raised with the site promoters; however, no satisfactory evidence has been provided to address these concerns. Having regard to the requirement for Local Plan allocations to be available, suitable and deliverable, the Council has concluded that MSA27 can no longer be relied upon as a deliverable allocation. Consequently, the site has been removed from the Regulation 19 Submission Version of the Local Plan and the housing supply calculations amended accordingly. The representation is therefore noted and no further modification is required.
Businesses, Landowners and Developers					
1471	14138	Stanfords (Beth Deacon-Bates, Head of Planning) [1471]	These representations support the retention of MSA27 Abbey Brook Development at Wix as a preferred allocation, arguing that the site is a logical, settlement-edge and technically deliverable location for around 20 dwellings, with flood risk, access, drainage, footpath and noise matters capable of being addressed through design, mitigation and policy wording rather than removal of the allocation. They also seek targeted changes to related draft policies, including simplification of flood policy and deletion of the proposed biodiversity net gain and water conservation policies where those are said to duplicate or exceed national and statutory requirements without sufficient local justification. See multiple attached documents.	Comment	Following the Regulation 18 consultation, the Council received new information regarding land ownership within MSA27 (Abbey Bottom Farm, Wix). Officers have been provided with evidence that approximately 40% of the proposed allocation site is now in separate ownership and that the owners do not support or intend to pursue residential development of their land. This change in circumstances raises significant concerns regarding the availability and deliverability of the site, including uncertainty over the ability to achieve a comprehensive form of development and secure an appropriate access arrangement. The implications of this information were raised with the site promoters; however, no satisfactory evidence has been provided to address these concerns. Having regard to the requirement for Local Plan allocations to be available, suitable and deliverable, the Council has concluded that MSA27 can no longer be relied upon as a deliverable allocation. Consequently, the site has been removed from the Regulation 19

					Submission Version of the Local Plan and the housing supply calculations amended accordingly. The representation is therefore noted and no further modification is required.
Community Representatives					
Members of the Public					

MSA27 Land at Abbey Bottom Farm, Harwich Road, Wix

Summary of Representations
Representations submitted for MSA27 included comments from different stakeholders. The Environment Agency commented that the site should be informed by a Level 2 SFRA, and another representation expressed support for the retention of the site.

New ownership information received following Regulation 18 has raised significant concerns regarding site availability, access and deliverability. As a result, MSA27 has been removed from the Regulation 19 Local Plan.

MSA28 Land north of Rectory Road, Wrabness

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
134	13691	Rose Builders Ltd (Mr Will Vote, Planning Manager) [134]	The allocation of this land is strongly supported. The site has few constraints and is proportionate to the size of Wrabness. It is of a scale that could be delivered relatively quickly by a medium sized developer.	Support	Noted.
Businesses, Landowners and Developers					
Community Representatives					
1652	6724	Wrabness Parish Council (Richard Colley) [1652]	We request a detailed sustainability and infrastructure assessment for the proposed 30 dwellings at Wrabness (MSA28) and propose conditions such as improving the A120/Primrose Lane junction, a no-street lights clause, a contribution for the playing field and pavement upgrades, and amending Policy HP5 to protect Station Masters Garden.	Comment	The allocation has been assessed through the Council's site assessment process, Sustainability Appraisal and supporting evidence base and is considered suitable for approximately 30 dwellings. Detailed matters relating to highway improvements, pedestrian infrastructure, biodiversity, lighting, open space contributions and protection of adjacent land would be considered through the planning application process. The Council is satisfied that existing Local Plan policies provide an appropriate framework and does not consider additional site-specific requirements are necessary.
Members of the Public					
981	3599	Ms Danielle Williams [981]	Thirty dwellings at Wrabness is disproportionate to the size, facilities and access constraints of the village. Most journeys will be car-based due to minimal walkable services, no continuous pavements and limited public transport frequency. The additional traffic (including construction traffic, deliveries and visitors) will use narrow country lanes with limited passing places and no street lighting, harming highway safety and residential amenity. The Plan does not demonstrate robust, deliverable mitigation. The allocation should be reduced, phased, or deleted unless transport, drainage and infrastructure impacts are properly evidenced and mitigated.	Object	The Council considers that the allocation represents a proportionate level of growth for a Smaller Rural Settlement and is consistent with the spatial strategy. Highway, infrastructure and sustainability matters have been considered through the Local Plan evidence base and will be subject to further detailed assessment through any future planning application. No modification is proposed.
1343	3987	Ms Nicky Davies [1343]	WRABNESS fails to meet objectives as it is a SMALL RURAL SETTLEMENT, extremely limited services & facilities. Everyone has to travel quite far for GP services, hospitals, pharmacy, nursery, primary, secondary schools, shops. No bus service. Train service limited & does not go to areas where many residents would have their GP/hospital. Few employment opportunities. Lack of leisure	Comment	Whilst Wrabness has more limited services than larger settlements, the Local Plan settlement hierarchy and overall growth strategy allows for a modest level of growth within Smaller Rural Settlements. The Council is satisfied that the scale of development proposed is appropriate and that transport and infrastructure considerations do not preclude development of the site. No modification is proposed.

			and social facilities. Pollution would be a main factor. Increased traffic accessing A120 from smaller road. Already fatalities.		
981	3604	Ms Danielle Williams [981]	The purpose of Garden Villages is to deliver comprehensive, infrastructure-supported growth at scale. These locations are intended to provide new schools, services, employment and sustainable transport links. Allocating 30 homes in Wrabness, where such infrastructure does not exist and cannot realistically be delivered at that scale, undermines the logic of concentrating growth in planned new settlements. Growth should be prioritised in locations designed to accommodate it sustainably, rather than dispersed into smaller rural settlements with limited facilities and car-dependent travel patterns.	Object	The Local Plan strategy focuses the majority of growth within the District's larger settlements and Garden Communities whilst also allowing a limited amount of development within rural settlements. The allocation of approximately 30 dwellings in Wrabness is consistent with this balanced approach and does not undermine the role of planned larger-scale growth locations. No modification is proposed.
981	3609	Ms Danielle Williams [981]	An 18-dwelling development in Wrabness took approximately three years to sell out, equating to an average absorption rate of around six dwellings per year. This suggests limited local market capacity. At a similar rate, a 30-dwelling allocation could take several years to complete and may not materially assist short-term housing delivery. The Plan should demonstrate clear evidence that this site is deliverable within the expected timeframe and justified in comparison with larger, infrastructure-led settlements capable of delivering housing more efficiently and sustainably.	Object	The Council's housing evidence indicates the site is suitable, available and achievable for development during the plan period. Sales rates on individual developments can vary according to market conditions and do not demonstrate that a site is undeliverable. No modification is proposed.
1383	4224	Mrs Joanna Thornicroft [1383]	The proposed settlement at Wrabness will provide NO new employment opportunities as there is little to none employment opportunities the area. There is also no transport, the bus being stopped some years ago, with an infrequent train service. Education, healthcare and employment all gave to be found by vehicle which is totally against the sustainable transport requirement that is sought, and simply contribute to climate change. We edge an AONB and SSSI. The development will be detrimental to wildlife with more light, noise and pets	Object	The Council acknowledges the limited employment opportunities and services within Wrabness. However, the settlement hierarchy allows for an appropriate level of housing growth in Smaller Rural Settlements. Ecological impacts will be subject to detailed assessment through any future planning application and development would be expected to comply with biodiversity and environmental policies. No modification is proposed.
1383	4242	Mrs Joanna Thornicroft [1383]	Summary: No existing facilities, detrimental local wildlife detriment climate know enhancement to existing community or services	Object	The Council is satisfied that the allocation has been assessed appropriately through the Local Plan process and that any future development would be required to address ecological, infrastructure and environmental considerations through the planning application process. No modification is proposed.
1385	4243	Mrs Monica Kurnatowska [1385]	MSA 28: Fails to meet P8 & 104-113 NPPF. Small rural settlement with high reliance on car for employment, school, GP, leisure, shopping. No bus. Limited rail. Increased traffic on narrow lanes with limited passing places & no pavement. Increased emissions. Fails to meet NPPF P79 - scale is disproportionate to existing settlement. Fails to consider cumulative impacts on limited infrastructure & traffic on rural road networks Absence of local services would export demand to neighbouring	Object	The Council does not agree that the allocation conflicts with national policy. The scale of development is considered proportionate to the role of Wrabness within the settlement hierarchy. Transport, infrastructure, environmental and ecological matters have been considered through the evidence base and would be subject to further assessment at planning application stage. No modification is proposed.

			settlements. Fails to consider impact on adjacent SSSI - NPPF P180. Erosion of countryside character, loss of openness and rural views Lack of employment		
529	4246	Mr Geoff Kurnatowski [529]	MSA 28: Fails to meet Para 8 & 104-113 NPPF. Small rural settlement with high reliance on car for employment, school, GP, leisure, shopping. No bus. Limited rail. Increased traffic on narrow lanes with limited passing places & no pavement. Increased emissions. Fails to meet NPPFpara79 - scale of development disproportionate to existing settlement. Fails to consider cumulative impacts on limited infrastructure & traffic on rural road networks Absence of local services would export demand to neighbouring settlements. Fails to consider impact on adjacent SSSI - NPPFpara180. Erosion of countryside character, loss of openness and rural views Lack of employment	Comment	For the reasons outlined in response to Representation 4243, the Council remains satisfied that MSA28 is a justified and sustainable allocation and no modification is proposed.
1390	4285	Mrs Emma Y [1390]	Suitable housing as stated must take in to account ALL social status. The proposed development at Wrabness must include affordable homes for first time buyers , taking in to consideration wages in this area, also to contain a caveat that they are not to be brought as buy to let. NOT in this category social housing which is completely different.	Comment	The detailed mix of dwellings and affordable housing provision would be considered through the planning application process having regard to adopted housing policies, identified needs and viability considerations. Restrictions on future ownership or occupation would only be applied where justified through planning policy. No modification is proposed.
1397	4316	Mrs Dale Bridges [1397]	MSA28 development would cause significant harm to a sensitive coastal site adjacent to woodland and the estuary, an area of recognised scientific interest that should be protected. A naturally unmanaged field, supporting biodiversity, with clear potential for ecological enhancement. The build scale is disproportionate to the village size and there are no schools, amenities, or local employment. Rail maintenance access runs through the site, further constraining access, while the nearby station is unsafe and lacks basic facilities, (no ticket machine). This proposal promotes unsustainable growth, increases risk, and damages the long-term environmental, economic, and tourism value of this coastal area.	Object	Ecological impacts, biodiversity interests, access arrangements and infrastructure constraints would require detailed assessment through any future planning application. The Council is satisfied that the allocation has been appropriately assessed through the Local Plan process and that environmental considerations can be addressed through existing planning policies. No modification is proposed.
1455	13703	Neil Bridges [1455]	I would like to state my objection to the proposed local development of the land north of Rectory road. My concern is that	Object	The allocation identifies the principle of development only. Detailed matters relating to site access, internal layout and servicing arrangements would be

			this particular plot is already contained by the houses that surround it and will soon become constricted with regards to transport. The plot would need room for through traffic similar to Wix village, emergency and refuge collection vehicles will require good access to the new residents. as it stands tractors and rail maintenance vehicles struggle to access the area behind Rectory road and as a result block and restrict Rectory road. I do not believe building a new access road by raising an existing dwelling will be enough to alleviate the issue. Please consider the area field south of Rectory road with access from the Wrabness to Manningtree road.		considered through the planning application process in consultation with the Highway Authority and other relevant bodies. No modification is proposed.
1452	13721	Eleanor Totman [1452]	I am writing to formally object to the proposed allocation of land north of Rectory Road, Wrabness for approximately 30 dwellings, as set out in the draft Tendring Local Plan. The proposal does not align with the NPPF with regard to economic, social, and environmental objectives. The growth proposed is of disproportionate scale, and there is no evidence that the cumulative impact of housing growth has been assessed. Such growth is not supported with the adequate infrastructure with regard to healthcare, education, public transport, drainage, or community facilities. Furthermore, residential development of this scale will generate recreational pressure on local wildlife and will do irreversible harm to the rural character of the village. It is questionable whether this growth reflects the needs of the local area. I do not object in principle to the Council's need to plan for new housing across the district. However, the allocation of 30 dwellings at Wrabness is not, in my view, consistent with the sustainability objectives of the NPPF, the requirements of the Settlement Hierarchy, or the infrastructure capacity of this location. Growth of this scale would be better directed toward the district's towns and Garden Village allocations, where infrastructure can be planned and delivered alongside development, and where residents can genuinely access services without reliance on a private car.	Object	The Council considers that the allocation is consistent with the spatial strategy and has been assessed through the Sustainability Appraisal and supporting evidence base. Infrastructure, environmental and transport considerations have informed site selection and would continue to be assessed through the planning application process. No modification is proposed.
1319	13728	John Pidgeon [1319]	No GP surgery or pharmacy within the village No bus service and irregular train service Very limited to no employment opportunities locally No nursery, primary or secondary school provision - primary school accessible by car only Only a small volunteer run community shop Shopping in nearby towns accessible only by car No leisure or social facilities Dangerous narrow windy roads in and out of village - more houses would intensify traffic Nightingales development took 3 years to sell all properties - therefore seems not a great demand for houses in village Increase demand on already limited infrastructure Loss of village character Loss of rural views and openness Trains not frequent enough for travel into London or nearer towns to be suitable for travel to work therefore increase in car journeys Parking pressures of cars for 30 new	Comment	Whilst Wrabness has limited services compared with larger settlements, the allocation reflects the role of Smaller Rural Settlements in accommodating a proportionate amount of housing growth. Detailed matters relating to drainage, highways and infrastructure would be considered at planning application stage. No modification is proposed.

			homes Surface water- how would this be managed? It does not seem viable for so many new homes to be built in a village this small. I cannot see how this would work. Surely families would want to be nearer shops and schools and be able to use public transport. Kindly consider the above points.		
1129	13747	Mrs jackie pells [1129]	I would like to write with objection to the plan of 30 new dwelling in Wrabness The scale of 30 dwellings represents a significant proportional increase in a small rural settlement with limited infrastructure. The absence of local healthcare and education facilities means additional housing will increase car-dependent travel to neighbouring towns, which appears inconsistent with sustainability objectives The village is served by narrow rural lanes with limited passing places and minimal pedestrian infrastructure, and additional vehicle movements may adversely affect safety and amenity. Affordable and market housing provision should prioritise smaller accessible 1-2 bedroom homes and bungalows suitable for downsizers and first-time buyers. Enabling older residents to remain within the village supports ageing in place, reduces pressure on external health and care services, frees up larger homes for families.	Object	The Council considers the scale of development to be proportionate and appropriate. The detailed housing mix and type of dwellings proposed would be considered through any future planning application having regard to identified local housing needs and relevant Local Plan policies. No modification is proposed.
1252	13750	Chris Orlopp [1252]	Wrabness already experiences severe pressure on local services, including GP provision, dentistry, schools, utilities and transport. Public transport is limited, roads are narrow and unsafe, and extra traffic would worsen access and pedestrian safety. Past housing development sold slowly, suggesting limited demand. The proposal conflicts with adopted Local Plan policies, would alter the village boundary, and threatens protected landscapes (SSSI and AONB). The village lacks infrastructure and local employment, raising concerns about sustainability, environmental impact, and whether family housing would be viable.	Comment	The objection is noted. The Council's evidence does not indicate that infrastructure, environmental constraints or housing market conditions would prevent delivery of the site. Ecological impacts and infrastructure requirements would be assessed in detail through the planning application process. No modification is proposed.
1490	13776	Kevin Thornicroft [1490]	Further housing development in Wrabness is unsustainable and contrary to national and local planning policy. Wrabness is a very small rural settlement with minimal services, no bus provision, limited employment and heavy reliance on private cars, conflicting with NPPF sustainability and transport objectives. The scale of proposed growth would represent a disproportionate increase, strain already limited infrastructure, and alter village character, with no clear evidence of infrastructure capacity or delivery. Concerns are also raised about cumulative impacts, ecological harm to nearby SSSI and protected estuarine sites, landscape damage, and weak economic sustainability due to limited local jobs.	Object	The Council considers that a development of approximately 30 dwellings represents an appropriate level of growth for Wrabness and that environmental, infrastructure and transport matters can be appropriately addressed through existing planning policies and the development management process. No modification is proposed.
1394	13784	Mrs Amanda Britton [1394]	I am writing in reference to the above local plan consultation doc reg 18 rectory road Wrabness, local planners often take into consideration the impact of privacy of new developments overlooking established properties and their rights to privacy. We believe that this proposed development will impact us as we are directly behind the. Therefore would respectfully suggest if this is agreed to be built upon bungalows are used on the outside of the development to mitigate the lack of privacy if two storey houses	Comment	The comments are noted. Issues relating to privacy, overlooking, building heights and layout are detailed design considerations which would be assessed through the planning application process. The allocation does not determine the detailed form of development. No modification is proposed.

			were built. I wish this to be applied to this development as it has been applied to other developments. Please advise why this is not being considered? Also the fact that a previous development has recently been built in Wrabness on the Nigtingales estate with all the water, sewage and facilities and I would like to ask why this is not being considered for expansion. As we have already been through the disruption of this development and we are now expected to suffer the same disruption if this proposed prefered site is considered. Please tell me why this is not being considered?		
1283	13788	Mrs Debra Pidgeon [1283]	The proposed 30 new dwellings at Wrabness raise significant concerns. The village lacks essential services, including a GP, pharmacy, schools, regular bus services, local employment, shops, and leisure facilities, making residents heavily car-dependent. Public transport is infrequent and unsuitable for commuting. Narrow, hazardous roads would face increased traffic and parking pressure. Existing infrastructure is already limited, and surface water management is unclear. Previous developments sold slowly, suggesting low housing demand. Overall, the scale of development risks harming village character, rural views, and openness, and appears unsustainable for such a small settlement.	Comment	Infrastructure, transport and drainage considerations have informed the allocation process and would be subject to further detailed assessment through any future planning application. The Council remains satisfied that the site is suitable for allocation. No modification is proposed.
1169	13796	Ms CAMILLA NIEMELA [1169]	The proposal conflicts with policies on Rural Development, Sustainable Development, Infrastructure Capacity, Ecology, and Landscape Character. A 30?dwelling scheme would represent a disproportionate 16–25% growth in a village of around 400 residents, undermining rural vitality and settlement hierarchy. The village lacks essential services, and existing roads, parking, public transport, and community facilities are already overstretched. Increased traffic and pressure on limited recreational space would harm amenity. Proximity to SSSIs and sensitive landscapes risks ecological disturbance and erosion of rural character, with insufficient demonstrated community or environmental benefit.	Object	The Council considers that the allocation represents proportionate growth consistent with the settlement hierarchy and has been appropriately assessed through the Sustainability Appraisal and supporting evidence.
1616	13802	Alasdair Ritchie [1616]	Objection to the proposed 30 dwelling development in Wrabness. The village is a very small rural settlement with minimal services and infrastructure, chosen by residents for its quiet character. A scheme of this size would represent an unprecedented and disproportionate increase in population, fundamentally altering village life. Recent housing nearby took several years to sell, casting doubt on need and viability. The village lacks public transport, school capacity, healthcare provision and suitable road infrastructure, and wider traffic conditions are already deteriorating. The proposal is unsustainably located and would result in unacceptable harm to rural character and the wider transport network.	Object	The Council considers that the allocation represents a modest and proportionate level of growth that can be accommodated within the village. The site is considered suitable, available and achievable and capable of contributing towards the District's housing requirement. No modification is proposed.
1509	13803	Linda Piper [1509]	I object to Policy MSA28 (Land North of Rectory Road, Wrabness) as it conflicts with the principles of sustainable development in the National Planning Policy Framework. Wrabness is a small rural settlement with very limited services, including no GP, pharmacy, schools, or reliable public transport. Future residents would be heavily reliant on private cars to access essential services, employment and education, which is contrary to national policy	Object	The Council considers that the allocation aligns with the overall spatial strategy and has been assessed against sustainability objectives through the preparation of the Local Plan. Infrastructure and transport matters do not indicate that development of the site would be unacceptable. No modification is proposed.

			promoting sustainable transport. The proposal also fails to demonstrate adequate infrastructure capacity or consideration of cumulative impacts, making the site unsuitable for this level of development.		
1396	13854	Mrs Beverley Griggs [1396]	I formally object to the proposed housing development at MSA28 in Wrabness due to serious concerns about its impact on property, infrastructure, and the environment. Previous construction traffic along the narrow access road caused significant damage to my historic cottage and surrounding land, which is not suitable for heavy vehicles and lacks pavements and lighting. The proposal also threatens nearby protected habitats and wildlife. Local infrastructure, including schools, roads, and services, cannot accommodate further growth. Increased traffic and congestion will worsen existing conditions, and I urge reconsideration of this proposal in light of these impacts.	Object	Construction impacts, access arrangements and protection of neighbouring properties are matters that would be considered in detail through the planning application process. Environmental impacts would also be subject to detailed assessment. These concerns do not warrant removal of the allocation. No modification is proposed.
1348	13907	Miss Alice Cole [1348]	The dangerous A120/ Primrose Lane junction: I am concerned that traffic generated from the development will make this already lethal junction even more hazardous. Sustainability: From Wrabness, cars are needed to access nearly every useful service (GP, school, baby/toddler group, nursery, shops). One train per hour and zero buses make relying on public transport virtually impossible. I am concerned that each dwelling could have one or two cars each, adding to the strain on our tiny lanes which are already dangerous for pedestrians and cyclists. Impact on biodiversity and wildlife in area near a SSSI: I ask that as a village we are able to request no streetlights as part of this development. We need our dark skies for moths, bats, owls and other important wildlife.	Comment	Highway safety, sustainability and biodiversity matters have been considered through the evidence base supporting the Local Plan. Any future development proposal would require detailed technical assessments and compliance with relevant environmental and highway policies. No modification is proposed.
1343	13962	Ms Nicky Davies [1343]	30 new homes vastly increases small rural community, which has already had 20 new homes since 2021. Many took years to sell meaning no market for bigger homes in Wrabness. 77 dwellings in main village in 2021. An increase of 50 more in short space of time would detrimentally change Wrabness from a rural village community. No infrastructure: small roads, no schools, nurseries, shops, GPs. Increased population means more traffic, congestion & pollution. Particularly going onto and leaving A120 from small road where already several fatalities. Alter settlement character and density. Small volunteer led village shop, therefore more cars going to shops. Lack of public transport: limited train service, no bus service. No GP service. Use of cars to get to other villages where surgeries. Limited employment. Smaller homes preferable to larger houses - proof in that the houses on the Nightingales development remained unsold for several years, and some prices were reduced by up to £100k. Empty houses just to meet numbers Tendring has to fulfill would not serve any purpose.	Comment	This comment is noted. The Council has chosen an approach to development which allocates sites across the District, in order to meet new housing targets set by the Government. This approach includes smaller settlements, such as Wrabness, where smaller sites have been considered to ensure proportionate growth having regard to the size of the settlement and to meet the short to medium-term housing numbers. With that in mind, this selection has been made with regard to infrastructure capacity and will be informed by the updated Infrastructure Delivery Plan (IDP). This report sets out where infrastructure is required to meet the needs of the growing population, including transportation, GP, schools, and other facilities. The types of housing developed are informed by the Strategic Housing market Assessment (SHMA), which outlines housing need through evidence-based methodologies. The report does so with considerations to the housing market and local economy.
1505	13964	Lucy Cohen [1505]	Concerns that the proposed 30?home development would significantly alter the character and density of Wrabness, a small rural village with very limited services. There is no GP, pharmacy or	Comment	The objection is noted. The Council recognises concerns regarding infrastructure, transport, drainage and environmental impacts. These issues have informed the site assessment process and would be subject to further

			regular bus service, limited train provision, few local jobs, and schools are only accessible by car. Recent housing has already increased pressure, despite weak demand locally. The proposal would increase car dependency, congestion and pollution, exacerbated by poor pavements and a dangerous A120 junction. Serious concerns also arise regarding sewerage capacity and impacts on nearby protected Stour Estuary habitats, dark skies and rural tranquillity. Development should instead be focused in settlements with adequate infrastructure, with any growth here limited, well-justified and supported by appropriate facilities.		detailed consideration through any future planning application. The allocation remains appropriate and no modification is proposed.
1624	14089	Christine Abbott [1624]	I am writing to object to the plans to build 30 new homes in Wrabness. The allocation of 30 dwellings in Wrabness is inconsistent with the Spatial Strategy. Wrabness is a Smaller Rural Settlement where this scale of development is disproportionate. The proposal fails the test of sustainability due to high car dependency, lack of local services, rural narrow roads, and is therefore an unsound element of the Local Plan Review. Allocating 30 homes in a sensitive rural area which borders a designated Area of Outstanding Natural Beauty is less sound than expanding existing urban areas. Can you tell me how this is consistent with the logic of your own strategies and national planning principles?	Object	The Council considers that the allocation is consistent with the Local Plan spatial strategy, which directs the majority of growth to larger settlements whilst allowing limited, proportionate growth within Smaller Rural Settlements. The sustainability implications of the allocation have been assessed through the evidence base and do not justify removal of the site. No modification is proposed.
1454	14121	Clive Totman [1454]	My comments on Draft Allocation MSA28 (land north of Rectory Road, Wrabness) are that the proposal does not comply with the NPPF due to its unsustainable location, with minimal services and infrastructure leading to heavy car dependency. The site is close to sensitive environmental designations, including an SSSI and coastal protection area, raising concerns about habitat damage and biodiversity loss. The scale of development is disproportionate to a small rural settlement and would harm its character. There is also insufficient consideration of cumulative impacts, and overall the adverse effects are considered to outweigh any potential benefits. (SEE ATTACHED DOCUMENT FOR MORE INFORMATION)	Comment	The Council does not agree that the allocation is inconsistent with national policy. The site has been assessed through the Local Plan evidence base, including sustainability and environmental considerations. Any potential impacts on nearby environmental designations would require detailed assessment and mitigation through the planning application process. No modification is proposed.
1310	14122	Lorraine and George Coquard [1310]	Wrabness is a very rural village with very limited services, doctor surgeries, schools, nurseries, bus service, etc. Our main objection is this will take away our privacy to the rear of our property and if access is to be to the right hand side, this will impact badly on our privacy and the road noise. This will also mean the erosion of prime agricultural land detriment of our area of national outstanding beauty. It will also increase car use when we believe the policy is getting more people to use public transport. Approximately 77 dwellings in 2021, 20 dwellings recently constructed, and a further 30 dwellings proposed, that's approximately 60-70% housing numbers within a short time frame.	Object	Matters relating to privacy, access arrangements, landscape impacts and relationships with neighbouring properties are detailed design considerations that would be assessed through the planning application process. The Council considers the allocation to be appropriate in principle and does not propose any modification.

			For such a small village we feel the village is being engulfed by new houses and will lose all of it's camaraderie. When people move in house by house they can integrate quite quickly into the village, but it seems we are being swamped by new houses and people. We think it will break up the structure of village life and take away the character of the village. We will also have a loss of openness and rural views with a disturbance to protected bird populations. It will also bring many more cars to such a small village. We have been monitoring the amount of cars going through the village and the speed of a lot of the cars is quite dangerous and this proposal will only amplify the problem. So summing this all up, we think this proposal is in the wrong place!		

MSA28 Land north of Rectory Road, Wrabness

Summary of Representations

Representations submitted for MSA28 include a mix of support, objections, and comments. The representation in support of the site commented that it has few constraints, is proportionate to the size of Wrabness, and can be delivered relatively quickly by a medium sized developer. Wrabness Parish Council requested a detailed sustainability and infrastructure assessment for the allocations and proposed improvements to infrastructure and leisure spaces. Objections to the site argued that the allocation is disproportionate to the size and Wrabness, and that current facilities and services are inadequate for the proposed growth. Other concerns included drainage, pollution, employment opportunities, access, housing markets, environmental impacts, tourism impacts, and loss of local character. A few representations also stated that MSA28 contradicts the NPPF. Some representations also discussed issues with demand on the Nightingales development.

The Council considers MSA28 to be a justified and sustainable allocation for approximately 30 dwellings, representing a proportionate level of growth for a Smaller Rural Settlement and consistent with the Local Plan spatial strategy. Infrastructure, highway, drainage, ecological, landscape, design and amenity matters have been assessed through the Local Plan evidence base and would be subject to further detailed consideration through the planning application process. The Council remains satisfied that the site is suitable, available and achievable, and no modifications to the allocation are proposed.

MSA29 Land at Weeley Council Offices

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					
1417	4385	Mr reginald tricker [1417]	Important building for the village and should be treated sensitively	Comment	The Council recognises that the former Weeley Council Offices building is a distinctive and well-known feature within the village and that its redevelopment should be undertaken sensitively. However, the building is not a designated heritage asset, being neither statutorily listed nor included on any Local List of Heritage Assets. As such, it does not benefit from any specific heritage protection beyond that afforded through the planning system generally. Notwithstanding this, any future development proposal for the site will be required to comply with the Local Plan's design, placemaking and character policies, which seek to ensure that development responds positively to local context, respects the character and appearance of the surrounding area, and delivers high-quality design. The detailed design, layout, scale and appearance of any redevelopment would therefore be assessed through the planning application process. The Council is satisfied that these existing policy requirements provide an appropriate framework to secure a sensitive redevelopment of the site and no further site-specific policy requirement is considered necessary.

MSA29 Land at Weeley Council Offices

Summary of Representations
The representation submitted for MSA29 noted the importance of the Weeley Council Offices to the local community and argued the site should be treated sensitively.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA29 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

MSA30 Former Tendring Hundred Waterworks Site, Clacton

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
1335	4375	Affinity Water Ltd [1335]	The proposed medium sized allocation at land at Waterworks Dive in Clacton (Site Ref. MSA30) is supported, and it is requested that this allocation is retained in emerging TDLPR. A minor change is requested to the site allocation boundary so that is includes the vacant and derelict residential dwelling in south western part of site.	Support	Noted.
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					
581	4175	Mrs Sally Webb [581]	Sensible use of site if not required any longer	Support	Noted.
933	14011	Susan Bamber [933]	Concerns are raised about the proposed 80 dwelling development at the former Tendring Hundred Waterworks site. Although partially brownfield, the site includes undeveloped areas such as the pond and surrounding habitats, which support biodiversity and link directly to the Strategic Green Gap. Development risks harming established ecological networks and undermining the purpose of that designation. Serious concern also arises from the proposed demolition of waterworks buildings identified as having regional or national heritage significance, with recommendations for listing. The loss of both ecological and historic assets would conflict with national and local planning policy. The suitability, scale, and approach of the proposal should therefore be reconsidered, prioritising heritage conservation, habitat protection, and the integrity of the Green Gap.	Comment	The site is a current allocation that is carried forward from the adopted Local Plan. The current Local Plan review does not introduce a new allocation on this land but continues the Council's existing commitment to the redevelopment of this previously developed site for residential purposes. The principle of development has therefore already been established through earlier plan-making processes. In relation to biodiversity, whilst parts of the site contain areas of ecological interest, including the pond and associated habitats, the allocation does not override the requirement for any future development proposal to comply with national and local planning policies relating to biodiversity, habitat protection and biodiversity net gain. Detailed ecological surveys and assessments would be required as part of any planning application, with appropriate avoidance, mitigation and enhancement measures secured where necessary. The Council is satisfied that ecological considerations can be appropriately addressed through the development management process and do not justify removal of the allocation. The Council also notes the concerns regarding the site's heritage assets. However, the allocation itself does not predetermine the retention or demolition of any particular building. Heritage impacts would need to be fully assessed at the planning application stage, having regard to the significance of any designated or non-designated heritage assets and the requirements of both national and local planning policy. Any future proposal would be expected to demonstrate that heritage considerations have been appropriately taken into account and that any impacts are justified and balanced against the benefits of redevelopment. With regard to the Strategic Green Gap, the allocation boundary reflects that established in the adopted Local Plan and has been carried forward

					without significant change. The Council is satisfied that the allocation can be developed without undermining the overall objectives or function of the Strategic Green Gap, subject to the detailed design and assessment of any future planning application. Accordingly, the Council considers the allocation remains appropriate, justified and consistent with the adopted development strategy, and no modification is proposed.

MSA30 Former Tendring Hundred Waterworks Site, Clacton

Summary of Representations
Representations submitted for MSA30 include a mix of support and comments. Affinity Water requested a minor amendment to the site allocation boundary to include a derelict building. A separate comment had concerns with regard to the ecological and historical assets on the site.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA30 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

MSA31 Land adjoining Harwich & Parkeston Football Club, Dovercourt

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
791	3722	Sport England (Mr Roy Warren, Planning Manager) [791]	The MSA31 allocation site substantially comprises the car park serving Harwich & Parkeston Football Club's stadium and provides the only on-site car park that serves the club site. The potential loss of the car park to residential without mitigation would prejudice the use of the football club as car parking would have to be provided for off-site which could result in highway congestion and residential amenity conflicts in the surrounding area. It is requested that the potential allocation of this site includes a development requirement that suitable alternative car parking provision is made and delivered as part of any development.	Object	The Council does not consider it necessary or justified to introduce a site-specific development requirement relating to replacement parking provision for Harwich & Parkeston Football Club as part of Allocation MSA31. MSA31 is a relatively small allocation for approximately 24 dwellings and is carried forward from the adopted Local Plan, with the number of dwellings proposed having been reduced from the existing allocation. Introducing a new development requirement at this advanced stage in the plan-making process would therefore be unreasonable, particularly where the matter has already been considered through the development management process. Furthermore, planning permission has recently been granted for residential development of the site. As part of that approved scheme, alternative parking provision is secured to the rear of the neighbouring football club to compensate for the loss of the existing car park used primarily on match days. The replacement parking area is located within the south-western corner of the football club site, outside of the allocation boundary, on an area currently comprising mown grass and a small redundant clubhouse building. The adequacy and suitability of this replacement parking provision were fully assessed during the determination of the planning application. It was concluded that the proposed parking arrangements would not materially prejudice the continued operation of the football club, would not have an unacceptable impact on the sporting use of the site, and would provide an appropriate level of off-street parking. Given the physical constraints of the football club site, including the extent to which the football pitch occupies the frontage, alternative parking solutions are not realistically achievable elsewhere within the site. In light of the extant planning permission and the replacement parking provisions already approved, the Council is satisfied that the issue has been appropriately addressed. Consequently, the inclusion of an additional site-specific requirement within Allocation MSA31 is neither necessary nor justified.
Businesses, Landowners and Developers					
Community Representatives					

Members of the Public					
980	3594	Rebecca Styles [980]	Object to site allocation MSA31 Land adjoining Harwich & Parkeston Football Club, Dovercourt. There is no written justification in the draft Local Plan and the loss of parking for the club will be detrimental to road safety. There is already too much on street parking due to the Royal Oak pub not having a car park and dependence of existing dwellings with no off-street parking needing to park on the road. The ASDA junction, school parking restrictions and nearby pedestrian crossing make this a very dangerous road to add more on-street parking to. Too dangerous, must be removed.	Object	MSA31 is a long-standing allocation carried forward from the existing Local Plan and has been reduced in scale to approximately 24 dwellings. Furthermore, planning permission has recently been granted for residential development of the site, during which the highway and parking implications were fully assessed by the Highway Authority and the Local Planning Authority. The approved scheme includes replacement parking provision for Harwich & Parkeston Football Club to mitigate the loss of the existing car park. Consequently, the Council is satisfied that the development would not result in unacceptable levels of on-street parking or highway danger. Any impacts upon the local highway network, including nearby junctions, parking restrictions and pedestrian movements, have already been considered through the planning application process and were not found to justify withholding permission. The Council therefore considers the allocation to be appropriate and does not consider its removal to be justified.
1090	3776	Mr Jay Thomas [1090]	The proposed 24 homes on land currently used as a car park for Harwich and Dovercourt Football Club and as informal overflow parking for Mayflower Primary School. Losing this space will push event and school parking onto surrounding streets and the High Street, increasing dangerous parking and risks to pedestrians and cyclists. With an estimated 33 additional cars from the development, the High Street entrance opposite Heron Way could effectively turn a T-junction into a crossroad, causing congestion. Local infrastructure is already strained, with the nearby primary school close to capacity and limited GP provision in the area.	Object	The allocation is for a modest residential development of approximately 24 dwellings and has been carried forward from the existing Local Plan at a reduced scale. Planning permission has recently been granted for development of the site, and the impacts on parking, highway safety and local infrastructure were fully considered during the determination of that application. The approved scheme includes alternative car parking provision for Harwich & Parkeston Football Club to compensate for the loss of the existing parking area. The Council is therefore satisfied that the continued operation of the football club can be accommodated without giving rise to unacceptable parking pressures on surrounding streets. In addition, the traffic associated with a development of this scale was assessed through the planning application process and was not considered to result in severe highway impacts or unacceptable risks to pedestrians and cyclists. Matters relating to school capacity, healthcare provision and other infrastructure requirements are considered through the wider evidence base supporting the Local Plan and do not indicate that the allocation is unsuitable for development. Accordingly, the Council considers that MSA31 remains a sound and appropriate allocation and no modification is proposed.

MSA31 Land adjoining Harwich & Parkeston Football Club, Dovercourt

Summary of Representations

Representations submitted for MSA31 are all objections. Sport England objected no the basis that the allocation would impact car parking for the football club, therefore resulting in highways congestion and residential amenity impacts. Sport England suggests alternative car parking be provided as mitigation. Two other representations object due to the loss of car parking, arguing that this would cause increased street parking, highways congestion, and safety issues. Other concerns related to infrastructure capacity near the site.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA31 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

MSA32 Station Yard / Avon Works, Walton

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council Response
Technical Stakeholders					
Businesses, Landowners and Developers					
Community Representatives					
Members of the Public					
969	4506	Mr Scott Gilmour [969]	Repurposing land adjacent to Walton on the Naze station for housing would represent an efficient use of space. Given the proximity to the station as well as the town centre and bus stops nearby, I hope that a large supply of housing can be built here relative to the plot size, with less need for car parking due to how close it is to town and mentioned transit hubs.	Support	Support noted.

MSA32 Station Yard / Avon Works, Walton

Summary of Representations

The representation submitted for MSA32 supports the allocation, commenting that it would be a good use of space, and that its proximity to the station and town centre could accommodate a large supply of housing.

Having carefully considered the representations and the matters raised, the Council does not consider there to be sufficient justification to remove this allocation from the Local Plan. The Council remains satisfied that MSA32 represents a suitable, sustainable and deliverable site capable of contributing towards meeting the District's identified housing.

CHAPTER 10: DELIVERING INFRASTRUCTURE

Policy DI1: Infrastructure Delivery and Impact Mitigation

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/ Object/ Comment	Council response
Technical Stakeholders					
258	4279	Frinton and Walton Town Council (Miss Tanya Smith, Clerk) [258]	Objective 4 Infrastructure Provision strongly support The garden villages make good use of the main routes into the district; Additionally, the Hare Green garden village potentially will create a new road connection to Harwich.	Comment	Noted.
349	4331	Suffolk and North East Essex ICB (NHS) (Mr Chris Crisell, Estates Strategic Planning Manager) [349]	Comments by health partners	Comment	Noted. The Council will update references from Clinical Commissioning Groups to Integrated Care Boards where appropriate and will continue to engage with health partners through preparation of the Infrastructure Delivery Plan.
262	5211	Great Bromley Parish Council (Lizzie Ridout, Clerk) [262]	Existing infrastructure – roads, sewage, water supply, electricity networks and public transport – is insufficient for the planned growth and requests clear funding commitments, questioning the plan's ability to achieve its strategic focus on infrastructure delivery.	Comment	Noted. Policy DI1 requires new development to be supported by necessary infrastructure and to demonstrate sufficient capacity or deliver appropriate mitigation. The Infrastructure Delivery Plan identifies infrastructure needs, costs, responsibilities and funding sources where possible, and will be used as a live document to support delivery and monitoring.
262	5240	Great Bromley Parish Council (Lizzie Ridout, Clerk) [262]	Concerns that Sectio 106 contributions alone will not deliver the infrastructure needed for the proposed growth and request clear information on additional government or authority funding commitments.	Comment	Noted. The Plan recognises that developer contributions will be secured through Section 106 and that the IDP will identify infrastructure needs, funding sources and delivery responsibilities where possible. The Council will continue to work with infrastructure providers to support a coordinated approach to infrastructure delivery.
166	6799	Essex Fire (Essex Fire) [166]	Infrastructure Funding Schedule. Making Essex safer together Additional evidential considerations for how Essex County Fire and Rescue Service are an essential infrastructure provider for local developments in the Tendring District. Vulnerable communities:	Comment	Noted. The Council will review wording in relation to emergency services as part of critical infrastructure and will consider the role of police, fire and ambulance services through the Infrastructure Delivery Plan. Policy DI1 already applies the widest reasonable definition of infrastructure and infrastructure providers.

			The Tendring Local Plan identifies several areas with heightened vulnerability, including communities exposed to coastal risk, socio-economic deprivation, rural isolation, and limited access to services. The ECFRS CRMP similarly recognises these demographic and geographic factors as key drivers of increased fire risk and reduced resilience. As development is directed into or near these sensitive locations, S106 contributions are justified to ensure that additional growth does not disproportionately impact vulnerable groups. Funding may be required for enhanced operational capacity, improved access, targeted prevention activity, and resilience infrastructure to protect those most at risk. Infrastructure & Emergency Services The Tendring Local Plan identifies emergency services as essential infrastructure required to support and accompany all new development. This aligns with the ECFRS CRMP, which emphasises that effective emergency response relies on adequate resourcing, strategically located assets, and infrastructure that grows proportionately with population and risk. As development expands across Tendring, S106 contributions are necessary to ensure that emergency services infrastructure is delivered in parallel, preventing additional demand from undermining statutory response standards and safeguarding community safety. Risk & Resilience Considerations The Local Plan highlights a range of risk factors across Tendring, including coastal vulnerability, flood risk, rural isolation, and ageing populations. These issues closely mirror the risk environment identified within the ECFRS CRMP, which recognises that such vulnerabilities heighten the likelihood and impact of emergencies. To ensure resilience is built into new development, S106 funding may be required for enhanced firefighting water supply, improvements to local operational capacity, or resilience infrastructure designed to mitigate the identified risks. Such measures ensure new growth does not exacerbate existing vulnerabilities. Growth Areas Driving Service Demand Significant planned growth in housing, employment land and supporting community infrastructure will lead to increased demand for fire and rescue services across the district. The CRMP sets out the need for scalable response capability and the importance of aligning service provision with future growth projections. S106 contributions therefore play a critical role in enabling ECFRS to deliver necessary infrastructure such as station upgrades, hydrants, and operational assets to ensure		

			Making Essex safer together that emergency service provision remains effective and resilient as Tendring's communities expand. Justification for S106 Contributions: the Local Plan confirms that planning obligations will be used where development generates additional pressure on existing infrastructure, providing a clear policy basis for ECFRS to seek mitigation through S106. The CRMP evidences that population growth, increased housing density, and wider community expansion directly increase incident demand and complexity, particularly in areas already experiencing heightened vulnerability. Securing appropriate S106 investment ensures that ECFRS can maintain response times, prevention capacity, and fire safety resilience as Tendring's communities grow. (See attached documents for developer funding requirements)		
235	6856	Alresford Parish Council (Mr Matt Cooke, Alresford Parish Council Clerk) [235]	We are concerned that the Infrastructure Delivery Plan does not adequately address the shortfall in key infrastructure – roads, rail, schools, health facilities and recreational areas – needed for the projected housing growth.	Comment	Noted. As part of the Regulation 19 version of the local plan, the Council has commissioned a full Infrastructure Delivery Plan to identify the main infrastructure required to support growth, including transport, education, health, utilities, leisure and green infrastructure. Policy DI1 requires sufficient infrastructure capacity to be demonstrated or delivered by development proposals, with mitigation agreed with the Council and relevant infrastructure providers where required.
638	6937	Essex Police (Mrs Nicki Lyden) [638]	The Tendring Local Plan Area is covered by the Tendring District Policing Area. The baseline police resources within the Local Policing Area are operating at capacity, and would be significantly impacted by the planned housing and population growth envisaged. It is therefore necessary for the planned housing and population growth, and the related increase in crime to persons and property to be addressed as follows; - By including an infrastructure policy(s) & text in the local plan which reference the requirement for developer funded police facilities to provide for effective community safety, cohesion & policing to create sustainable new communities, as outlined above: With this in mind; - Insufficient recognition is currently provided by Chapter 10 (Delivering Infrastructure) Table 10.1 (Implementation) & the text/ Glossary of the Adopted Tendring District Local Plan 2013-2033 & beyond Section 2; - By including an appropriate level of police facilities provision & funding to mitigate & manage the community safety, cohesion & policing needs arising within the Infrastructure Delivery Plan (IDP): With this in mind; - Insufficient recognition is currently provided by the Tendring Infrastructure Delivery Plan Report (October 2017) & related	Object	Noted. The Council will review wording in relation to emergency services as part of critical infrastructure and will consider the role of police, fire and ambulance services through the Infrastructure Delivery Plan. Policy DI1 already applies the widest reasonable definition of infrastructure and infrastructure providers.

			Chapter 8 (Emergency Services) Table 13.1 (Infrastructure summary table – by type of infrastructure) & Table 13.2 (Infrastructure summary table – by settlement) to the level of developer funding required to mitigate & manage the effects of planned growth; The development of housing sites within each growth area would lead to an increased draw on police resources, and significantly impact on the Tendring District Policing Area Teams which are operating at capacity. It is suggested that the infrastructure policy be amended to require developer-funded police facilities (e.g., stations, vehicles, ICT) for large developments, funded via Section?106 or CIL, to meet statutory crime-reduction duties. Essex Police also proposes text for inclusion in the IDP update.		
254	7122	Elmstead Parish Council (Angela Baxter, Clerk) [254]	Infrastructure-First Disconnect: Despite "infrastructure-first" rhetoric, policy loopholes allow significant residential occupation before critical infrastructure is operational. We are concerned that existing local healthcare services are already at a breaking point and doubt the plan's ability to provide sufficient health and wellbeing infrastructure for the projected population increase. impact assessments for TCBGC were based on data gathered during the COVID-19 pandemic, which underestimates real-world trends. Furthermore, the modelling fails to account for the cumulative burden of three additional garden communities, rendering the current projections inadequate. Elmstead already experiences significant peak-hour congestion. The allocation of 300 homes in Brightlingsea alone will result in thousands of additional journeys through our parish to access eastern Colchester and the A120 via the A1331, a factor seemingly overlooked in the current plan.	Comment	Noted. Policy DI1 requires infrastructure capacity to be demonstrated or delivered and allows mitigation to be secured through financial contributions, on-site provision, off-site works and/or land. Detailed and site-specific requirements, including phasing and transport matters, will be addressed through the relevant site policies, the Connected Places chapter, the Infrastructure Delivery Plan and the planning application process.
90	13439	Tendring Parish Council (Mrs Marie Snell, Clerk/RFO) [90]	The Parish Council remains concerned that infrastructure delivery lacks certainty and enforceability. • Highway improvements are not guaranteed. • Healthcare and schooling expansion are not secured. • Utility upgrades are not confirmed. Local primary and secondary schools are already experiencing capacity pressures. The Parish Council is concerned that: • Increased pupil numbers may require children to travel further afield.	Object	Noted. The Local Plan is supported by the Infrastructure Delivery Plan, which identifies infrastructure needs across categories including transport, education, health and utilities. Policy DI1 requires development to demonstrate sufficient infrastructure capacity or to deliver appropriate mitigation, and enables obligations to be secured through Section 106 and/or CIL where appropriate.

			• Safe walking routes to schools are inadequate due to lack of pavements. Development should not proceed without confirmed education infrastructure delivered ahead of occupation.		
6	13482	Anglian Water Services Limited (Ms Tessa Saunders, Spatial Planning Advisor – Sustainable Growth) [6]	Anglian Water welcomes this policy to ensure that infrastructure delivery is provided in step with development. The policy should also consider that where appropriate, development may need to be phased to align with the delivery of essential infrastructure. Anglian Water is funded in different ways to deliver infrastructure within our region. For example, we are unable to accept developer funding to upgrade our WRC's (Water Recycling Centres). Therefore, we cannot currently be requisitioned to upgrade a WRC at a developer's cost, although such opportunities are being explored. WRC upgrades must be delivered through our 5-yearly Business Plan investments and agreed with our regulators. We agree that the delivery or the capacity of essential infrastructure must be confirmed by the provider or acceptable mitigation provided. Where this is not possible, development should be phased by condition of a planning permission or by prior agreement with the developer to ensure the delivery of infrastructure at the appropriate time. On large strategic developments that are being delivered over the plan period and beyond, improvements to essential infrastructure and phasing should be addressed in masterplans. This requirement should also apply to future phases of developments where either a full or reserved matters planning application is required. We consider that such measures are appropriate and fundamental to our investment programmes and future priorities for infrastructure delivery to support sustainable growth - providing the flexibility to include contributions to utilities infrastructure, should this be required in the future.	Support	Noted.
1654	13519	Natural England (Jonathan Burt) [1654]	NE advises that the requirement to mitigate the adverse impacts of larger site allocations via the provision of SANG is a requirement under the Habitats Regulations and, as such, viability concerns are not a valid reason for not providing the required SANG. TDC may wish to make this clear by updating the wording of Policy DI1	Comment	Comments noted. As stated, this is covered by different legislation. No wording changes are proposed to Policy DI1.
823	13582	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	ECC welcome that the IDP will include a category for Green Infrastructure (GI) and that GI is recognised as necessary infrastructure, supported by Policy DI1. ECC Transportation Planning and Infrastructure team welcomes the intent of Section 10 and Strategic Policy DI1, which establishes that development will only be permitted where sufficient infrastructure capacity exists, or where mitigation and new infrastructure can be	Comment	Comments noted. Detailed requirements of this nature will generally be dealt with at planning application stage. Transport is addressed explicitly in the Connected Places chapter, particularly Policies CP1 and CP2 and supporting text, and infrastructure requirements are contained in the Infrastructure Delivery Plan.

			delivered in a timely and coordinated manner. This aligns strongly with the strategic requirements for transport. However, Section 10 and policy DI1 could be more explicitly recognise the significant role of transport, active travel, Rapid Transit, rail, and digital mobility infrastructure in enabling sustainable growth. ECC recommends strengthening the Section so that: • Infrastructure delivery is phased, enforceable and tied to occupation triggers • The proposed LTP4 movement hierarchy and evidence led mode shift principles are embedded • Transport mitigation and emission reduction are treated as core infrastructure, • Cumulative impacts are demonstrably not severe, in line with NPPF paragraph 116 • Infrastructure delivery—particularly sustainable transport, active travel, digital mobility, and demand management should be phased to support early mode shift and reduce car dependency, consistent with the existing LTP3 and proposed LTP4 movement hierarchy. • Proposals shall safeguard and deliver LCWIP and Active Travel Network Plan (ATNP) routes, including compliant LTN 1/20 design, crossings, and junction treatments. Rail infrastructure improvements may be required to support the level of growth planned and should therefore be considered eligible for developer contributions where development directly increases rail demand. This ensures that rail capacity and station access keep pace with growth in the Garden Villages, Clacton, and Harwich. Comment and recommended change Whilst this policy is strongly supported, financial obligations are also included in some site policies, which is inconsistent and repetitive. With regards to education and childcare land, a separate policy should be added requiring submission of a Land Compliance Study Report (section 4.3 of the ECC Developers' Guide) prior to validation of the relevant planning application. It should also require conformity with the Essex Design Guide Schools Guidance.		
849	13588	NHS Property	Draft Policy DI1 sets out the appropriate mitigation measures to be agreed with the Council where a development proposal requires	Comment	Noted. The Council will change references from Clinical Commissioning Groups to Integrated Care Boards and will continue to engage with

		Services Ltd (NHS Property Services) [849]	additional infrastructure capacity, and the process through which developers are expected to contribute towards the delivery of relevant infrastructure. Supporting Paragraph 10.9 states that healthcare services and facilities are provided by North East Essex Clinical Commissioning Group and National Health Service England Midlands and East (NHSE) England. NHSPS welcomes and supports the inclusion of health within the broad categories of necessary infrastructure. We highlight that Clinical Commissioning Groups (CCGs) were replaced by ICBs in the NHS in England in 2022, and therefore recommend that references to the previous CCG be updated to the local Integrated Care Board to support effective healthcare service and infrastructure delivery. In line with our comments to Policy HP1 – Part B, where contributions are sought for healthcare infrastructure, we would recommend the Council to engage with the local ICB as the responsible bodies for the planning and commissioning of healthcare infrastructure. The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. We recommend the Council engage with the NHS, particularly the ICB, on an on-going basis as part of preparing the Infrastructure Delivery Plan (IDP). A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to support growth, and to ensure that both planning obligations and the capital allocation processes for the CIL effectively support and result in capital funding towards delivery of the required infrastructure. Related to this, appropriate healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies. Such an approach means that developers are adequately informed in advance that they may be required to make contributions towards healthcare infrastructure. A separate cost input for health infrastructure in the plan viability assessment would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. This is particularly important in situations where a viability assessment demonstrates that proposals are unable to fund the full range of infrastructure requirements.		relevant NHS bodies through preparation of the Infrastructure Delivery Plan. The Council has also considered the cumulative costs of infrastructure and other policy requirements through the Local Plan viability work.
1710	13626	National Grid (Kevin Roeton, Senior Consents Manager (Onshore	As you will be aware, on 16th December 2025, the Government published a consultation seeking views on the revised version of the NPPF. This consultation ended on the 10th March 2026 and it is anticipated that an amended version will be published in 2026. Notwithstanding its current draft status, Tendring District Council should be aware that draft policies W1 (Planning for Energy and Water), W2 (Securing renewable and low carbon energy, and	Comment	Noted. Major infrastructure of national significance is planned and determined through the Planning Act 2008 regime and guided by National Policy Statements. The Council will work proactively with promoters and relevant authorities to ensure that impacts are appropriately managed and that opportunities to support local growth and infrastructure provision are maximised.

		Planning)) [1710]	electricity network infrastructure) and W3 (Renewable and Low Carbon Energy Development and Electricity Network Infrastructure) in combination add support to the role and function of NGET insofar as the administering of its responsibilities is concerned, including expansion of the existing electricity network where required. The Overarching National Policy Statement for Energy (EN-1) also concludes that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure including electricity infrastructure to meet the Clean Power 2030 mission and net zero. The LPA should be cognisant of the above matters when developing the Local Plan.		
244	13644	Ardleigh Parish Council (Ardleigh Parish) [244]	Infrastructure Deficit The Parish Council considers that: Roads (including A137 and local rural roads) are already at or beyond capacity Healthcare, education, and utilities are under strain Public transport provision is insufficient Safe cycle and walking routes need to be provided. There is no clear, funded, and deliverable infrastructure plan to support the scale of proposed growth.Request: Adopt an "infrastructure-first" strategy, with: Legally binding delivery mechanisms Phased development tied to infrastructure provision	Comment	Noted. Policy DI1 requires sufficient infrastructure capacity to be demonstrated or delivered, and mitigation to be agreed with the Council and appropriate infrastructure providers where needed. The Infrastructure Delivery Plan will identify infrastructure needs and delivery responsibilities where possible and will support a coordinated approach to infrastructure delivery.
48	14359	Essex Police [48]	Paragraph 10.9, Page 309 After (NHSE) England in line 6, insert a new sentence as follows; “Police, fire & rescue and ambulance infrastructure and facilities by Essex Police, Essex County Fire & Rescue Service and the East of England Ambulance Service NHS Trust.” Chapter 10 Delivering Infrastructure, Table 10.1 Implementation After Health authorities including North East Essex Clinical Commissioning Group & any future health bodies, insert a new row to the table as follows; “Police, Fire & Rescue & Ambulance Services” • The provision of police, fire & rescue and ambulance facilities in the District; • Liaising with TDC regarding necessary infrastructure planning including proposals for new facilities in the District” Paragraph 10.8, Page 309	Comment	Noted. The Council will review wording in relation to emergency services as part of critical infrastructure and will consider the role of police, fire and ambulance services through the Infrastructure Delivery Plan. Policy DI1 already applies the widest reasonable definition of infrastructure and infrastructure providers.

			Insert a new bullet point as follows; “Police, fire & rescue and ambulance infrastructure/ facilities” (Please see second attached document for comments on the IDP)		
48	14370	Essex Police [48]	There is no reference to Essex Police as an essential social infrastructure provider requiring developer funded police facilities in Chapter 9 Delivering Places. Essex Police therefore consider that the text and policies within the Preferred Options Local Plan Regulation 18 Consultation and Infrastructure Delivery Plan are incomplete, and not justified, effective or consistent with national policy.	Comment	Noted. The Council will review wording in relation to emergency services as part of critical infrastructure and will consider the role of police infrastructure through the Infrastructure Delivery Plan. No further wording changes are proposed to Policy DI1 at this stage.
Businesses, Landowners and Developers					
1439	13899	Catesby Estates [1439]	Catesby generally supports Draft Policy DI1, which seeks to ensure that new development is supported by appropriate infrastructure and mitigates any impacts. In respect of the Site, which forms part of the draft allocation SAMU5, it is considered that the infrastructure requirements can be delivered in a sustainable and phased manner, and the Site is capable meeting the policy objectives.	Support	Support noted.
205	14337	Latimer [205]	TDC’s IFS should be updated to include reference to the required and stated infrastructure (the Park & Choose, the A1331 Link Road, Secondary School provision, a Swimming pool and Leisure Centre facility etc.) to ensure that both contributions can be sought from site allocations and that the pooling of these contributions can be used to fund the infrastructure items. TCBGC is referenced a number of times within TDC’s Infrastructure Delivery Plan, dated 22 December 2025. This document contains a number of references to TCBGC and makes assumptions on infrastructure delivery at TCBGC and financial contributions the project will make to infrastructure provision. These commitments from the TCBGC project, and their timings, are not confirmed, agreed or secured (via S106 or otherwise). Therefore, TDC should not base their emerging Local Plan policy on these assumptions, particularly on timings. We provide specific commentary below: (See attached document for commentary) In addition to the above commentary on the Reg18 draft Local Plan, Latimer have also reviewed the associated viability work also subject to this consultation – namely the Local Plan Viability Assessment, (January 2026). The areas of concern relate to Existing and Benchmark Land Value, Build Costs (including External Works, Garages, Net Zero and contingency assumptions), Section 106 assumptions, and Residential Mix/Tenure assumptions.	Comment	Noted. The Council will review Latimer’s comments as part of the production of the Infrastructure Delivery Plan. However, no changes are proposed to the policy wording.

Community Representatives					
953	3554	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Officers consider that the representation submitted is broad in scope and does not clearly reference specific policies or site allocations within the Local Plan. The Council assesses heritage matters on a case-by-case basis, and it is considered that other policies within the Plan provide adequate protection for heritage assets while promoting high-quality design.
1520	13813	The Harwich Society (Richard Colley) [1520]	3.1 We recommend the Local Plan identifies local physical and social infrastructure needs related to planned growth. Policy DI1 sets out infrastructure policy aspirations and expectations, supported by the strategic overview in the Infrastructure Delivery Plan. This identifies some key infrastructure issues for new residential clusters. For the Harwich area this highlights strategic issues relating to primary education, electricity and water supply. We note at this time no strategic information is published around health provision. 3.2 The scale of development proposed will require appropriate upgrades, local extension and investment, both on and off site, to existing infrastructure such roads, water, sewerage and utility services, as well as the local social infrastructure such as schools, health, public transport and community facilities. 3.3 New infrastructure requirements to support the planned level of growth in localities should be scoped in the Review Local Plan. Timely public investment or developer contributions will be essential to ensure public/private investment in infrastructure matches future phased development. The public perception is this is a recurring failure of the current national and local planning system. For example the A120 Trunk Road serving Harwich is now promoted in the Review Local Plan as a Growth Corridor. However the improvement and dualling of this road has become a long term orphan project with no secure funding. Unless responsible organisations fund and deliver timely infrastructure to address pressures generated by the sheer scale of development proposed in the Review Local Plan, the quality of life in the District will be diminished. end of representation	Comment	Noted. The Infrastructure Delivery Plan sits alongside the Local Plan and reviews infrastructure needs for the plan period. Policy DI1 requires development to demonstrate sufficient infrastructure capacity or to deliver appropriate mitigation, with contributions secured through Section 106 and/or CIL where appropriate. The Council will continue to work with infrastructure providers to support coordinated delivery.
1712	14245	Bernard Jenkin [1712]	Tendring's population is due to increase by 12,000 people over the next 10 years, closely following the expected 15,000 increase in Colchester. These forecasts are based on previous trend growth and therefore reflect already high levels of housing growth. A higher proportion of the population in Tendring is aged over 65[3], however, and this demographic will become more acute as the population expands. The Regulation 18 TDC Local Plan 2025-2042, based on the proposed housing numbers and typical household size, implies a population increase of around 27% over the plan period. Tendring District Council plans to accommodate the existing residential needs whilst household growth increases demand on services.	Comment	Noted. Thank you for your continued support. The Council recognises the importance of ensuring that growth is supported by necessary infrastructure and that infrastructure deliverability is central to the Local Plan. Policy DI1 requires all new development to be supported by, and have good access to, necessary infrastructure, and permission will only be granted where sufficient appropriate infrastructure capacity exists or will be delivered by the proposal. Where additional capacity is required, mitigation must be agreed with the Council and relevant infrastructure providers, including through financial contributions, on-site provision, off-site works and/or land where appropriate. The Infrastructure Delivery Plan sits alongside the Local Plan and will identify infrastructure needs, costs, phasing, funding sources and delivery responsibilities where possible,

			The Local Plan must be driven by infrastructure deliverability. Communities across Tendring recognise the need for growth but the current infrastructure deficit cannot accommodate the Government targets of 1,063 homes per year without significant upfront investment. Highways and healthcare improvements must be delivered alongside development. Critical improvements like the Manningtree underpass must be made to serve the expanding community in advance of housing development.		including for transport and healthcare. The Council will continue to work with infrastructure providers to ensure that highways and healthcare improvements are planned and delivered in a coordinated way alongside development. Paragraph 8.28 of the Connected Places chapter expressly refers to partnership working with Essex County Council, Suffolk County Council, Babergh District Council and Network Rail to explore opportunities to improve the A137 and the railway crossing/underpass at Manningtree Station. The Council recognises the cross-boundary importance of this location and will continue to work with relevant partners to consider options, funding opportunities and the relationship with growth in both Tendring and neighbouring authority areas.
Members of the Public					
963	3455	Mr Michael Hearn [963]	There is a lack of parking at rural railway stations which will cause untold pressure on local roads.	Comment	Noted. Transport infrastructure, including access to public transport nodes and interchanges, is addressed through the Connected Places chapter and the Infrastructure Delivery Plan. Detailed requirements will be considered through the planning application process where relevant.
1059	3733	Mr Matthew Sutton [1059]	Policy DI1's viability provisions are welcome but must require public verification of assessments before planning permission is granted, not after. Table 10.1 references the abolished CCG rather than the current NHS Suffolk and North East Essex ICB - raising questions about whether current health body engagement has taken place for SAH2 and SAH3. Most critically, paragraph 10.8 lists GP surgeries within IDP scope, but SAH2 and SAH3 contain no healthcare policy requirement. The IDP does not bind developers; only site-specific policy does. That gap must be closed by amending both site policies.	Comment	Noted. The Council will update references from Clinical Commissioning Groups to Integrated Care Boards. Policy DI1 requires development to demonstrate sufficient infrastructure capacity or to deliver appropriate mitigation, and viability assessments must be transparent and open book where relied upon. Site-specific healthcare matters will be considered through the relevant policies, the Infrastructure Delivery Plan and the planning application process.
1106	3940	Mr Jack Martin [1106]	While this policy appears robust, it relies heavily on developer promises and viability assessments that can weaken infrastructure requirements in practice. The “exceptions” clauses create significant loopholes, allowing developments to proceed without full mitigation where viability is disputed. This risks leaving communities with inadequate infrastructure and long-term strain on services. There is also insufficient certainty on when infrastructure will be delivered, meaning it may lag behind housing. Overall, the policy lacks firm guarantees and enforceable safeguards to ensure infrastructure is in place before development impacts are felt.	Object	Noted. Policy DI1 requires development to be supported by necessary infrastructure and allows exceptions only where specific tests are met, including transparent open book viability assessment, investigation of innovative solutions and obligations to provide additional mitigation if viability improves. The Council considers this approach proportionate and consistent with ensuring the Plan remains deliverable.
581	4178	Mrs Sally Webb [581]	Your document does not mention Affinity Water, who are the fresh water supply company for this area; a serious omission I think.	Comment	Noted. The Council consults service operators, including Affinity Water, where relevant to infrastructure planning and delivery.
753	4214	Mr Martin Colley [753]	As the Tendring area is in the driest part of the country, high priority should be given to the supply of water to new and existing communities. It is not feasible for new developments to just expect that the existing water supply infrastructure can cope with the increased demand.	Comment	Noted. Water supply, wastewater, flood risk management and water quality are identified as broad categories of necessary infrastructure within the Infrastructure Delivery Plan. Policy DI1 requires development to demonstrate sufficient infrastructure capacity or that such capacity will be delivered by the proposal.
1417	4391	Mr reginald tricker [1417]	There is considerable effort in researching and justifying road/car based schemes, which will only underpin car dependency, and little if anything to underpin needs of Local Plan to promote active travel	Comment	Noted. Policy CP1 already requires development to provide safe, direct and attractive walking and cycling routes, enhanced connectivity to public

			and health, tourism and accessibility benefits that can be brought by making it safe and normal to travel between villages and settlements by bike, and sometimes walking, that residents should be able to easily do. There is no infrastructure across most of inland Tendring to do any safe cycling. The need for significant investment and leadership in medium distance active travel routes must be referenced in this Local Plan.		rights of way and green infrastructure, and good walking and cycling connections to public transport nodes and interchanges.
1427	4412	Mrs Elspeth Knott [1427]	Currently, the A120 is unable to cope with the amount of traffic at busy times of the day. Cars have to wait 5-10 minutes to get onto the A120 from the side roads, e.g. Bentley Road. If two large Garden Communities go ahead (Hare Green and Horsley Cross) the road will become grid locked and is used for all port traffic. The following photos were taken at 6.00p.m. at the Little Bentley Rd Junction with A120.	Comment	Noted. Transport matters are addressed through the Connected Places chapter and the Infrastructure Delivery Plan. Policy DI1 requires development to be supported by necessary infrastructure and to mitigate impacts where additional infrastructure capacity is required.
1427	4481	Mrs Elspeth Knott [1427]	Health- doctors, dentists and opticians are oversubscribed in this area already. Most are in Manningtree and are oversubscribed requiring current residents in this area to travel further afield.	Object	Noted. Health infrastructure is identified as a broad category of necessary infrastructure in the Infrastructure Delivery Plan. Policy DI1 requires development to demonstrate sufficient infrastructure capacity or to deliver appropriate mitigation, with contributions secured where appropriate.
822	4502	Rachel Fletcher [822]	why are residents not mentioned?	Comment	Noted. The Local Plan has been prepared through public consultation and recognises that infrastructure delivery is of particular concern to residents and businesses. Policy DI1 and the Infrastructure Delivery Plan seek to ensure that development is supported by necessary infrastructure.
1385	4508	Mrs Monica Kurnatowska [1385]	Developers in the small village sites should be required to contribute cash to the local parish for local services - these should not go to the general TDC pot. A huge concern in lack of primary places in the area eg for Wrabness, Wix and Bradfield, the primary schools are full/close to being full, and a new school at Horsley Cross would not be delivered in time for the housing in these villages. In Wrabness, there is no primary school and so all options involve a private car	Comment	Noted. Developer contributions will be secured through Section 106 where appropriate. Education infrastructure is identified within the Infrastructure Delivery Plan, and detailed requirements will be considered with the relevant providers through site policies and the planning application process.
1495	14179	Please draft [1495]	Tendring is facing major national infrastructure projects that will permanently alter the landscape and place long-term pressure on rural communities. The installation of high-voltage pylons across the district will require abnormal-load vehicles, heavy machinery, and the creation of temporary access tracks across farmland and open countryside. These works will cause soil disturbance, habitat loss, and changes to drainage patterns, with long-lasting effects on the environment. The district is also expected to host a large new substation and additional associated substations. These installations generate continuous low-frequency noise, require extensive land take, and introduce industrial structures into areas that are currently rural in character. Once built, these facilities cannot be screened or mitigated in any meaningful way. Residents have repeatedly raised concerns about the decision to pursue an onshore pylon route when offshore alternatives were	Comment	Major infrastructure of national significance is planned and determined through the Planning Act 2008 regime and guided by National Infrastructure Planning Guidance. While such development is determined at a national level, the Council will work proactively with promoters and relevant authorities to ensure that impacts are appropriately managed and that opportunities to support local growth and infrastructure provision are maximised.

			available, less destructive, and presented fewer long-term impacts on communities and the countryside. The Neighbourhood Plan must recognise the scale and permanence of these infrastructure projects and set out policies that protect rural character, minimise environmental harm, and ensure that future decisions prioritise the wellbeing of local communities.		

Policy DI1: Infrastructure Delivery and Impact Mitigation

Summary of Representations

Representations on Policy DI1 and Chapter 10 raise a broad range of infrastructure issues, with many respondents emphasising that planned growth must be supported by timely, deliverable and funded infrastructure. Parish councils, community representatives and members of the public express concern that existing roads, healthcare, schools, water supply, utilities, public transport, active travel routes and community facilities are already under pressure and may not be able to accommodate the proposed level of growth without significant investment and clear delivery mechanisms. Several representations seek an "infrastructure-first" approach, including phasing linked to occupation, enforceable delivery triggers and greater certainty that highways, healthcare, education, utilities and other essential infrastructure will be provided alongside or ahead of development. Particular concerns are raised about the A120, A137, Manningtree Station crossing/underpass, rural road capacity, school places, GP and wider health provision, water supply and the cumulative impacts of growth across Tendring and neighbouring areas.

Technical stakeholders generally support the principle of Policy DI1 but request clarification or strengthening in specific areas. Health bodies welcome the inclusion of healthcare infrastructure and request references to Clinical Commissioning Groups be updated to Integrated Care Boards. Essex Police and Essex Fire seek clearer recognition of emergency services as critical infrastructure providers. Essex County Council supports the policy intent but highlights transport, active travel, rail, digital mobility, education and green infrastructure considerations. Anglian Water supports the need for infrastructure to be delivered in step with development, including appropriate phasing where required. Developer and landowner representations include support for Policy DI1 where infrastructure can be delivered in a phased and sustainable manner, but also raise concerns about assumptions in the Infrastructure Delivery Plan, infrastructure funding schedules, viability evidence and the timing and security of infrastructure commitments.

The Council's responses note that Policy DI1 requires all new development to be supported by necessary infrastructure and that permission will only be granted where sufficient appropriate capacity exists or will be delivered by the proposal. Where additional infrastructure is required, mitigation must be agreed with the Council and relevant infrastructure providers and may include financial contributions, on-site provision, off-site works and/or land. Contributions will be secured through Section 106 where appropriate. The Council also notes that the Infrastructure Delivery Plan sits alongside the Local Plan and will identify infrastructure needs, costs, phasing, funding sources and delivery responsibilities where possible. It will be used as a live document to support coordinated delivery and monitoring. Detailed and site-specific requirements will be considered through site policies, the Connected Places chapter, the Infrastructure Delivery Plan and the planning application process.
In response to specific matters, the Council will update references from Clinical Commissioning Groups to Integrated Care Boards and continue to engage with relevant NHS bodies. The Council will update wording relating to emergency services as part of critical infrastructure and consider the role of police, fire and ambulance services through the Infrastructure Delivery Plan. Transport matters are addressed in the Connected Places chapter, particularly Policies CP1 and CP2, and through the Infrastructure Delivery Plan.

The Council recognises the cross-boundary importance of locations such as the A137 and Manningtree Station and will continue to work with Essex County Council, Suffolk County Council, Babergh District Council, Network Rail and other relevant partners to consider options, funding opportunities and the relationship with growth in Tendring and neighbouring authority areas. Overall, the Council considers that Policy DI1 provides a sound and appropriate framework for securing necessary infrastructure and mitigating the impacts of development.

Chapter 11: Monitoring and Review

Chapter 11: Monitoring and Review

Policy	Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders						
Vision	826	14508	Essex Wildlife Trust (Annie Gordon) [826	We note that Chapter 11 of the plan addresses monitoring and review but does not include specific ecological monitoring indicators. The effective delivery of the plan's ecological ambitions — including 20% BNG, LNRS delivery, and Habitats site protection — requires a robust monitoring framework with clear indicators, targets, and reporting responsibilities. We recommend that the Council includes the following specific monitoring commitments: annual reporting on BNG delivery (by type, location, and habitat unit value, via a publicly accessible register); periodic condition monitoring of Local Wildlife Sites within the plan area; collaboration with Natural England to monitor the condition of Habitats sites and their qualifying features over the plan period; and annual reporting on progress against LNRS priorities and GI delivery in the District.	Comment	The Council notes these suggestions. The monitoring framework has been intentionally kept proportionate and focused on strategic plan delivery, with a number of the matters raised already monitored through separate statutory processes and reporting mechanisms, including Biodiversity Net Gain monitoring requirements.
Objective 4: Infrastructure Provision	823	14557	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	ECC strongly supports the commitment to annual monitoring, five-yearly review, and the integration of wider datasets (Census, ONS, ECC forecasts, health data). The following suggested recommends are made to further strengthen monitoring of sustainable transport delivery, mode-shift outcomes, network performance, and cumulative impacts. These would help to support the spatial strategy and major allocations set out under the Local Plan: • While “sustainable travel” is included as a monitoring theme, Section 11 does not explicitly indicate the monitoring of: o Active travel uptake o Bus/RTS performance o EV ChargePoint deployment (public and private) o Travel Plan uptake o Mode-share achievement against any agreed targets	Comment	The Council has considered these suggested indicators. However, the monitoring framework is intended to remain proportionate and flexible, allowing the Council to draw on a range of relevant datasets and monitoring information over time rather than specifying an exhaustive list of measures within the Plan. The suggested biodiversity indicators are noted. However, Biodiversity Net Gain is subject to its own statutory monitoring and reporting requirements and it is therefore not considered necessary to duplicate these measures within the Local Plan monitoring framework.

				o Implementation of remedial mechanisms where targets are unmet Potential monitoring indicators for GI, BNG and LNRS could be: • Increase or decrease in local biodiversity units. Monitored annually through assessment of Biodiversity Net Gain compliance evidence submitted with planning applications Linked to Biodiversity Duty Report -these reports should include quantitative data on the BNG impacts of all developments approved since the introduction of mandatory BNG in February 2024. • Amount of green space created or enhanced within new developments. Planning Application monitoring and Developer contributions received for open space projects through infrastructure Funding Statement/S106 records/ Open Space Strategy. • Number of developments contributing to priority habitat areas identified in the LNRS. Planning application monitoring.		
PPL5: Water Conservation, Drainage and Sewerage	148	14558	Environment Agency (Environment Agency) [148]	We welcome that Policy PPL5 treats water supply and demand strategically, promotes water-efficient design, includes non-residential BREEAM requirements, requires early and completion-stage evidence, and encourages engagement with the water company. These broadly align with the Shared Standards document. The proposed 100 l/p/d standard is noted as a pragmatic approach. However, the policy could be strengthened by referencing relevant legislation, addressing low flows and agricultural pressures, and using the WCS/IWMS to justify targets. Greater clarity is suggested on verification, design statement content, and inclusion of AMR monitoring to support effective delivery.	Comment	The Council notes these comments. The monitoring framework has been intentionally kept proportionate and focused on strategic plan outcomes. Detailed monitoring of water efficiency, drainage and sewerage infrastructure is already informed through planning application requirements, water company reporting and other regulatory processes. It is therefore not considered necessary to incorporate additional policy-specific monitoring measures within the Local Plan.
Businesses, Landowners and Developers						
Community Representatives						
Members of the Public						

Chapter 11: Monitoring and Review

Summary of Representations

The Monitoring and Review section is referenced indirectly through several other parts of the Plan, including the Vision, Objective 4: Infrastructure Provision, and Strategic Policy PPL5: Water Conservation, Drainage and Sewerage. All relevant representations were submitted by technical stakeholders, including Essex Wildlife Trust, Essex County Council, and the Environment Agency.

Essex Wildlife Trust recommends the inclusion of monitoring commitments relating to Biodiversity Net Gain (BNG) delivery, the condition of Local Wildlife Sites, collaboration with Natural England to monitor the condition of Habitats Sites, and annual reporting on progress towards Local Nature Recovery Strategy (LNRS) priorities and Green Infrastructure (GI) delivery across the District.

Essex County Council recommends the inclusion of more specific sustainable travel indicators, such as active travel uptake, bus and Rapid Transit System (RTS) performance, electric vehicle (EV) charging provision (both public and private), Travel Plan adoption, and mode share against agreed targets. They also suggest considering remedial actions where monitoring indicates that targets are not being met. In addition, Essex County Council supports monitoring related to Green Infrastructure (GI), Biodiversity Net Gain (BNG), and the Local Nature Recovery Strategy (LNRS), including changes in biodiversity units, the amount of green space created or enhanced through development, and the number of developments contributing to priority habitat areas identified within the LNRS.

The Environment Agency advises that Strategic Policy PPL5 could be strengthened through references to relevant legislation, greater consideration of low-flow conditions and agricultural pressures, and the use of evidence from the Water Cycle Study (WCS) and Integrated Water Management Strategy (IWMS) to support monitoring targets and policy requirements. Further, they suggest there is greater clarity regarding verification, design statement content and the inclusion of AMR monitoring to support delivery.

In response, the Council has decided to keep the monitoring framework proportionate and focused on strategic plan outcomes. It is therefore not considered necessary to incorporate additional policy-specific monitoring measures within the Local Plan.

Appendix A: Glossary of Terms

Appendix A: Glossary of Terms

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
Community Representatives					
Members of the Public					

Appendix B: Local Maps

B.6 Clacton-on-Sea and Jaywick Sands

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
Community Representatives					
63	4016	Colchester Natural History Society (Mr Peter Hewitt, Planning Officer) [63]	There will need to be an effective barrier between development and the ancient woodland that protects the integrity of the woodland and its surrounding habitats.	Object	This representation is acknowledged. It is unclear which woodland this comment refers to. However, barriers between ancient woodlands and development will be considered through master planning on sites where relevant.
Members of the Public					

B.8a Fox Street

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
30	4509	Mr Bill Marshall [30]	I would like the proposed SDB at Fox Street to be expanded to include development 20/01058/FUL.	Comment	The Council agrees, and this will be reflected in the Regulation 19 version of the Local Plan.
Community Representatives					
Members of the Public					

B.10 Frinton, Walton, Kirby Cross and Gt Holland

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Developers, and Landowners					
Community Representatives					
Members of the Public					
1386	4251	Mr Luke Bailey [1386]	Infrastructure is not suitable. New houses need need be closer to Colchester.	Object	Whilst this representation is noted, it is not feasible to meet the entire housing need set by the Government's standard method in the West of the District. The spatial strategy set out within the Local Plan distributes development across the District in a well-planned, sustainable manner to preserve the local character and natural environment of existing settlements. Further to this, infrastructure requirements have been assessed through the Local Plan evidence, such as the Infrastructure Delivery Plan (IDP) and transport modelling, to support growth.

B.11 Great Bentley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
601	14356	Edward Gittins and Associates (Mr Edward Gittins, Chartered Town Planner) [601]	The requested change is to amend the Great Bentley Settlement Development Boundary to include land at St Mary's Field for mixed-use development. The representation argues this site is a more sustainable location due to its close proximity to the station, village centre and school, encouraging walking and reducing reliance on cars compared to northern sites. It highlights that the decision to exclude the site was based narrowly on traffic concerns without a full comparative assessment. The site could deliver housing, employment, open space, and a station car park, along with wider community benefits. It is considered a logical, well-connected extension that supports sustainable growth and village needs. (SEE ATTACHMENTS FOR FURTHER INFORMATION)	Object	This representation is acknowledged. The Council has chosen to allocate alternative sites in Great Bentley, the evidence for which will be set out in the SHLAA and Sustainability Appraisal.
Community Representatives					
Members of the Public					

B.12 Great Bromley

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
136	4483	Andrew Martin-Planning Limited (Mr Andrew Martin, Director) [136]	On behalf of the landowner, the two proposed allocations are fully supported. The sites have been the subject of pre-application requests and favourable responses have been issued by the Council. Consequently, planning applications are now being prepared for early submission and delivery of the two sites.	Support	Support for allocations in Great Bromley is noted.
Businesses, Developers, and Landowners					
Members of the Public					

B.16a Lanswood

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Landowners and Developers					
705	4191	Mr Peter Le Grys [705]	Policy area insufficient and inadequate.	Object	Whilst this representation is noted, the Local Plan does not allocate additional land around Elmstead or Ardleigh due to their proximity to the TCB Garden Community and their recently adopted Neighbourhood Plans.
Community Representatives					
Members of the Public					

B.21 Manningtree, Mistley and Lawford

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Developers, and Landowners					
Community Representatives					
Members of the Public					
368	3777	Mr Peter Rose [368]	Please correct the area of Safeguarded Open Space on the corner of School Lane and Green Lane, mistley. It currently has our house and garden (Land Registry titles [redacted]) coloured in as open space, and it is definite not open to the plublic. Please ensure this is corrected, we raised this last time there was local plan consultations, your colleagues agreed this could not be open space, but some how those amendments never made it into the master plan. thanks Peter	Object	This land will be removed from the Safeguarded Open Space designation on the Manningtree, Mistley, and Lawford Local Map.
15	14046	Mrs Karen Rose [15]	With reference to the Tendering Local Plan update, We have looked at the updated map of the Mistley Manningtree and Lawford Map and find that our garden is noted as a Safeguarded Open Space. I have highlighted this area on the plan below. I would be grateful firstly if you could relook at this area and remove it from the Safeguarded Open Space category and secondly provide a definition for this. I have included our Land Registry Titles [redacted] and [redacted] of our Garden. I look forward to hearing from you	Comment	This land will be removed from the Safeguarded Open Space designation on the Manningtree, Mistley, and Lawford Local Map.

B.26 Thorpe Station and Thorpe Maltings

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Developers, and Landowners					
Community Representatives					
Members of the Public					
63	4018	Colchester Natural History Society (Mr Peter Hewitt, Planning Officer) [63]	It will be necessary to protect the habitat and species in the nearby LWS	Comment	The Council agrees. Please see Chapter 7 for more policies relating to environmental conservation.

Appendix C: Local Wildlife Sites and Ancient Woodland

Appendix C: Local Wildlife Sites and Ancient Woodland

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response	
Technical Stakeholders						
Businesses, Landowners, and Developers						
Community Representatives						
Members of the Public						

Appendix D: Heritage Assets

Appendix D: Heritage Assets

Respondent ID	Representation ID	Name/ Organisation	Supporting docs	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders						
Businesses, Landowners, and Developers						
Community Representatives						
Members of the Public						

Appendix E: Loss of Community Facilities

Appendix E: Loss of Community Facilities

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
Businesses, Landowners, and Developers					
Community Representatives					
Members of the Public					

Appendix F: Affordable Housing

Appendix F – Affordable Housing

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object/ Comment	Council response
Technical Stakeholders					
Businesses, Developers, and Landowners					
Community Representatives					
953	3555	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
Members of the Public					

Appendix G: Saved Policies from Section 1 Local Plan 2013-2033

Policy SP8: Development & Delivery of a New Garden Community in North Essex

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
Businesses, Developers, and Landowners					
Community Representatives					
953	3556	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
Members of the Public					
822	4497	Rachel Fletcher [822]	the scale of the new garden villages is comparable to that of the TCB garden community which has been a long time in development/ discussion and has not yet delivered any houses. Are we certain that there is the need for all three developments in such relative close proximity. the character of the area would change forever, urbanising rural areas and putting pressure on all kinds of existing infrastructure especially Colchester General Hospital which seems to already be at capacity.	Comment	Though concerns with regard to local character surrounding the Garden Community are noted, the Garden communities are pivotal in the Council's ability to meet housing targets set by the Government. Officers are recommending the Local Plan retains its larger allocations so that longer-term housing numbers can be realistically achieved. Please see Chapter 7 of the Local Plan for policies which focus on the protection of the historic environment and landscape character of the area whilst such developments take place. With regard to health infrastructure, the Council will continue to work with the ICB and the NHS to ensure growth is supported by the appropriate facilities. The Infrastructure Delivery Plan (IDP) has been updated to inform on what types of infrastructure are needed and where to support the new housing allocations within the Local Plan.

Policy SP9: Tendring/Colchester Borders Garden Community

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
Businesses, Developers, and Landowners					
Community Representatives					
953	3557	Mr Community Campaigner David Barton [953]	Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.	Comment	Comment noted. The Plan includes strong place-making and design policies which are considered to be consistent with, and aligned to, the NPPF and associated guidance. However, the Council remains open to further refinement and is committed to ongoing improvement. The suggestions set out in the submission will be duly considered, and relevant policies will be updated where this is justified.
Members of the Public					

Integrated Sustainability Appraisal January 2026

Integrated Sustainability Appraisal January 2026

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Technical Stakeholders					
823	13585	Essex County Council (Rich Cooke, Principal Spatial Planner) [823]	The sustainability assessment bears no resemblance to actual travel times for any travel modes. On page 8 - Harwich - Brightlingsea: Cycling is notably quicker (approximately 30-40 minutes by bike compared to 62-77 minutes by bus). From Harwich to Brightlingsea - it takes at peak times with a higher frequency of service: Bus- 2 hours 7 minutes by bus - 2 changes if the routes connect, Train — 1 hour and 34 minutes - one bus and 3 train service changes, Cycling -1 hour and 29 minutes to cycle Car - between 28-45 minutes (based on unreliability of traffic leaving Brightlingsea) This time does not take into account the schedules - e.g. there are only half hourly buses, the buses do not connect with the rail service. The result in this report is not representative of real and actual travel times. They also do not take into account capacity for trains and buses. These stated travel times will need to be reviewed and considered carefully to ensure that they are realistically representative of the levels of service in the DfT connectivity tool https://connectivity-tool-lite.dft.gov.uk/app#11.1/51.8295/1.0955SP9	Comment	The ISA Report's approach to assessing public transport accessibility within site assessments (ISA Objective 3b) has been amended to better reflect the quality of the local bus network.
Businesses, Landowners, and Developers					
1002	3963	George Thompson Limited [1002]	Our client respectfully requests that the first row on page 158 of the ISA is amended to read: "More widely, Great Oakley has good access to services for a settlement of its size, but is ...".	Comment	Noted.
1406	4347	The MacDonald Family (Ravens Green) [1406]	In general our clients are supportive of the findings in TDC's ISA (January 2026), including in relation to the Hare Green Garden Village at pages 135, 136 and 140 of the Interim Report and pages 283-284 of Annex C. However, there are multiple references in the ISA to the preparation of Masterplan Supplementary Planning Documents (SPDs) for the new Garden Villages, after the adoption of the emerging new Local Plan. This conflicts with Policies SAMU8 and SAMU9 in the Local Plan Preferred Options document, which suggest that these Masterplans should be prepared as DPDs, not SPDs.	Comment	The ISA Report will be updated to refer to forthcoming Masterplan DPDs as opposed to SPDs.
1409	4373	The MacDonald Family (Frating) [1409]	**In** general our clients are supportive of the findings in TDC's ISA (January 2026), including in relation to the Hare Green Garden Village at pages 135, 136 and 140 of the Interim Report and pages 283-284 of Annex C. However, there are multiple references in the ISA to the preparation of Masterplan Supplementary Planning Documents (SPDs) for the new Garden Villages, after the adoption of	Comment	Duplicate rep input by user with rep 4347.

			the emerging new Local Plan. This conflicts with Policies SAMU8 and SAMU9 in the Local Plan Preferred Options document, which suggest that these Masterplans should be prepared as DPDs, not SPDs.		
774	13720	Trinity College [774]	**In** summary, the SHLAA and Sustainability Appraisal identify constraints but none that deem the site to be unsuitable or undeliverable. Technical work undertaken by the College since the Council's assessments were prepared demonstrates that access can be safely achieved, heritage impacts can be sensitively mitigated, biodiversity and landscape issues can be addressed, and the site is suitable and deliverable. The Councils evidence does not justify it being discounted from the draft Local Plan. The site remains a suitable and deliverable candidate for allocation.	Comment	Following multiple discussions with affected parishes, local politicians and following local plan committee meetings, there are wider strategic concerns relating to the scale and direction of growth proposed through this and other nearby sites located to the north and north-west of the existing settlement. Development extending significantly to the north and north-west of Brightlingsea risks undermining the established spatial pattern of the settlement, which the Plan seeks to reinforce and manage in a coherent and sustainable way.
Members of the Public					
990	3636	Ms Mary Clune [990]	House building is a good opportunity to boost the economy, if carefully planned. If local companies are used, in conjunction with apprentice schemes, both might begin to thrive. Fewer people would leave the area for employment and younger people would be more likely to stay local, as would their money. But 300 new homes for B'lingsea? Too many. If the designation were changed to medium site, and local builders only were used, and swift bricks mandatory in every new home, there is a beginning for negotiation. The public should have more say, if their money is involved.	Comment	As reported through the Local Plan Committee process, site allocation SAH4 has been removed from the Plan following further assessment. The revised strategy now focuses on a number of smaller-scale sites which collectively will continue to deliver growth, albeit at a reduced level and with a more distributed pattern.
1048	3691	Mrs. Patricia Brooks [1048]	In the ISA, Non tech report, transport, health and education, biodiversity, historic, landscapes, water quality, air quality, soil and agriculture and flood risk all cite possible or certain negative results and outcomes, both short and long term. How can this be justified to the existing residents, whose futures and those of their children (health, education, quality of life) are jeopardised by this damage to our area. The Elm Tree Avenue site in Walton has delayed phase 2 of building new houses as the original phase hasn't been sold. With this proposed level of future housebuilding, how will Tendring ensure that proposed houses will be sold, that there'll be enough infrastructure and assets, water, sewers etc	Object	Noted.
1059	3945	Mr Matthew Sutton [1059]	The ISA's own evidence base confirms that Primary School capacity is insufficient across all non-Clacton cluster areas of the District, yet the site assessments for SAH2 and SAH3 in the Frinton/Walton/Kirby Cross area do not flag this as a negative effect requiring mitigation. This inconsistency is material. The 'uncertain' rating for ISA Objective 4 (Health and Education) must be resolved - not deferred - before Regulation 19. A specific school capacity assessment for this cluster is required.	Object	The ISA Report will be updated to reflect the allocations proposed at the Regulation 19 stage, as well as any new evidence regarding school capacities. Effects raised will be amended where necessary.
1059	3946	Mr Matthew Sutton [1059]	The ISA identifies GP waiting times and new healthcare provision as key indicators for ISA Objective 4 but presents no baseline GP data for the Frinton, Walton and Kirby Cross area. The site assessments for SAH2, SAH3 and MSA2 do not assess GP access at all. The ISA's own data confirms Tendring has the highest median age and lowest life expectancy in Essex - making a digital-first healthcare substitute particularly inadequate. GP capacity baseline data must be added and the 'uncertain' health rating resolved before Regulation 19.	Object	The ISA Report will be updated to reflect the allocations proposed at the Regulation 19 stage, as well as any new evidence regarding school capacities. Effects raised will be amended where necessary.

1059	3947	Mr Matthew Sutton [1059]	The ISA's framework for assessing health and education effects is sound and its acknowledgement of the district-wide school capacity shortfall is important evidence. I support the approach of requiring on-site schools at Garden Village allocations and ask that this principle is extended as far as possible to smaller settlements. I ask that the process of resolving 'uncertain' health and education effects is conducted transparently, with outcomes published before Regulation 19.	Comment	Noted. Discussions are continuing between Health and Education providers and the Council. The ISA report will be updated to respond to any new evidence at the Regulation 19 stage.
457	4380	Ms Carol Bannister [457]	Regarding Annex C, in order to prevent an inevitable wildfire occurring, a further allocated site should surely be the field adjacent to Weeley Crematorium, whose owners still insist upon having huge and lengthy bonfires, with the smoke and flames often being directed towards the East facing Crem. conifers, which are only a few metres away and already suffering damage. The field and its contents should be compulsorily purchased by the Council, with part being used as a further extension to the crem's memorial grounds and part for housing with the latter's access via Colchester Road.	Comment	This is not a planning issue, rather this is a matter for Environmental Health should you wish to raise this.

Integrated Sustainability Appraisal January 2026

Summary of representations

In response to representations from Essex County Council, The ISA Report's approach to assessing public transport accessibility within site assessments (ISA Objective 3b) has been amended to better reflect the quality of the local bus network. The ISA Report will be also updated to refer to forthcoming Masterplan DPDs as opposed to SPDs. In response to comments promoting and challenging the large Brightlingsea site, sites in this location are not being taken forward for the reasons given.

The ISA Report will be updated to reflect the allocations proposed at the Regulation 19 stage as well as any new evidence at the Regulation 19 stage.

Whilst comments regarding pollution are noted, this is a matter for Environmental Health, rather than the Local Plan.

Habitats Regulations Assessment January 2026

Habitats Regulations Assessment January 2026

Respondent ID	Representation ID	Name/ Organisation	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Support/Object	Council response
Members of the Public					
1059	3948	Mr Matthew Sutton [1059]	SAH3 (200 homes, Walton) has been screened in for Likely Significant Effects on Hamford Water SPA under four impact pathways. Under the People Over Wind ruling, mitigation cannot offset this at screening stage - Appropriate Assessment is legally required. I object to SAH3 progressing to Regulation 19 without Appropriate Assessment being completed and published for public comment. The assessment must consider cumulative pressure from all Frinton/Walton/Kirby Cross allocations, not SAH3 alone. If it cannot rule out adverse effects on site integrity, the allocation must not proceed.	Object	At the Committee meeting on 8th June 2026 it was resolved that Site SAH2 for 200 homes off Arthur Ransom Way, Ward Chase and Coles Lane in Walton-on-the-Naze was deleted 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.
1059	3949	Mr Matthew Sutton [1059]	I support the Essex Coast RAMS framework but ask the Council to confirm that RAMS contributions from the Frinton/Walton/Kirby Cross cluster will fund local mitigation, not just be pooled district-wide. With 660+ new homes proposed adjacent to Hamford Water SPA, strategic RAMS alone is not sufficient - site-specific recreational pressure assessment for this coastal cluster is needed. The condition of this coastline also directly affects residents' health and wellbeing, particularly given the absence of adequate healthcare infrastructure in the area.	Comment	Whilst these comments are noted the projects undertaken for the RAMS contributions are determined by the Essex Planning Officers Association and whilst it is likely that a percentage of the contributions will go towards those sites within close proximity, this cannot be guaranteed.

Habitats Regulations Assessment January 2026

Summary of Representations
Comments were received regarding site SAH3, these were noted however this site has been removed and therefore no further consideration or response required.

Comments were received regarding where RAMS contributions are to be spent, however this is determined by Essex Planning Officers Association and cannot be considered within the Local Plan.

No changes are recommended for the HRA document.