

For internal Use only	ID:	Rep No:	

## Draft Local Plan

# RESPONSE FORM

Responses are encouraged via the council's online consultation system available on the website, see <http://tendring-consult.objective.co.uk/portal> However, this form can be returned electronically to [planning.policy@tendringdc.gov.uk](mailto:planning.policy@tendringdc.gov.uk) or in hard copy if necessary to:

Planning Policy, Tendring District Council, Thorpe Road, Weeley, Essex, CO16 9AJ  
**The consultation runs from 9am Friday, 16th June to 5pm on Friday, 28th July 2017**

This form has two parts:  
 Part A - Personal Details and Part B - Your comments

## PART A

### 1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Hopkins Homes Limited"/>
Address Line 1	<input type="text" value="C/o Agent"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Geoff"/>
Last Name	<input type="text" value="Armstrong"/>
Organisation	<input type="text" value="Armstrong Rigg Planning"/>
Address Line 1	<input type="text" value="The Exchange"/>
Address Line 2	<input type="text" value="Colworth Science Park"/>
Address Line 3	<input type="text" value="Sharnbrook, Bedford"/>
Post Code	<input type="text" value="MK44 1LQ"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

# PART B

# REPRESENTATION FORM

**Please Note:** If your representation relates to Section One of the North Essex Strategic Plan / Garden Communities you only need to respond to one of the Local Authorities. All representations received by Braintree, Colchester and Tendring relating to Section One of the Plan(s) will be submitted together.

You do not need to return this form if you have completed a response using any of the Council's online systems for this consultation. Duplicates will not be considered

**Please specify which section of the Publication Draft Local Plan your comments relate to by choosing one of the following:**

Section 1     Section 2 Colchester     Section 2 Tendring     Section 2 Braintree

**Which part of the section are you responding to?**

e.g. Paragraph/Policy/Map/Other

Section 1: Policies SP3, SP7 and SP8  
Section 2: Policies SAH3, LP1 and Section 2 – Vision and Objectives

**Do you consider the Local Plan is Legally compliant?**

Yes     No

**Does it comply with the Duty to Co-operate?**

Yes     No

**Do you consider the Local Plan is Sound?**

Yes     No

**If you do not consider the Local Plan is sound, please specify on what grounds:**

Positively prepared     Justified     Effective     Consistent with National Policy

**Enter your full representation here:**

Please see cover letter

*Continue onto next page*

**If your representation is more than 100 words, please provide a brief summary here:**

Please see cover letter

**Please specify the changes needed to be made to make the Plan sound / legally compliant**

Please see cover letter

**Do you wish to participate at the oral part of the examination?**

Yes  No

**If Yes - you wish to participate at the oral part of the examination, please outline why you consider this to be necessary**

To ensure points raised are adequately discussed.

**Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.**

**Did you raise the matter that is the subject of your representation with the LPA earlier in the process of the preparation of the Local Plan**

Yes  No

**If yes which stage**

Issues and Options  Preferred Options

**Do you wish to be notified?**

When the document is submitted for independent examination?

When the Inspectors Report is published?

When document is adopted?

**Braintree & Tendring: Return by 5pm 28th July 2017**

**(responses to section 2 Braintree and Tendring will not be accepted after this date. After this date responses to Section 1 should be sent to Colchester Borough Council)**

**Colchester: Return by 5pm 11th August 2017**

Ref: GA/DJ/01017/L0001

***Sent by email to [planning.policy@tendringdc.gov.uk](mailto:planning.policy@tendringdc.gov.uk)***

27 July 2017

Simon Meecham  
Planning Policy  
Tendring District Council  
Thorpe Road  
Weeley  
Essex  
CO16 9AJ

Dear Mr Meecham

**Representations to Tendring District Council Publication Draft Local Plan Consultation  
Robinson Road, Brightlingsea on behalf of Hopkins Homes Limited**

On behalf of our client Hopkins Homes Limited we wish to make representations to the current Tendring District Council Publication Draft Local Plan Consultation.

Previous representations were made directly by Hopkins Homes to the Tendring District Local Plan – Preferred Options 2016 Consultation in September 2016. These representations supported the emerging policy map for Brightlingsea (Map 9), which showed Hopkins Homes' site at Robinson Road, Brightlingsea as a preferred housing allocation, but raised concern regarding: the classification of Brightlingsea as part of the rural heartland as opposed to a seaside town; and the reliance solely on additional housing growth at Weeley in the scenario that 600 homes a year as opposed to 550 were needed.

**Robinson Road, Brightlingsea – *Support Policy SAH3 with small change requested***

Hopkins Homes support the allocation of land at Robinson Road, Brightlingsea and are pleased to confirm that this land is deliverable for residential development in the short-term over the next 5 years. Hopkins Homes are nearing completion on their highly regarded development at Robinson Road for 77 dwellings (approved by application reference 13/01470/FUL) and the proposed allocation would form a natural second phase to this development. Following a positive pre-application response from Tendring District Council in August 2016 (reference 16/30056/PREAPP) and positive discussions with Brightlingsea Town Council, a planning application for 115 dwellings is currently being finalised for the site for submission at the end of July 2017.

The only element of **Policy SAH3** that we wish to raise concern over is the wording of point which requires the allocation to provide at least 115 new homes. This wording places an unduly strict minimum level of development on the site. As outlined, the forthcoming planning application on the site proposes 115 dwellings. This would meet the emerging policy requirement, but it does not leave a lot a room for flexibility during the consideration of the

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application should the Council wish to see any changes to the proposals that would necessitate changes to the layout or mix of housing proposed. A more positively worded policy requirement would be for the site to provide approximately 115 new homes. We therefore request that the wording of point a. is re-worded as follows:

“a. ~~at least~~ approximately 115 new homes of a mixed size and type to include affordable housing as per the Council’s requirements”

### **Housing Need – *Objection to Policies SP3 and LP1***

We object to the housing requirement for Tendring District set-out at **Policy SP3 – Meeting Housing Needs** and **Policy LP 1 – Housing Supply**. These policies set the Objectively Assessed Housing Need (OAHN) for Tendring District as 11,000 new homes (550 per annum) between 1<sup>st</sup> April 2013 and 31<sup>st</sup> March 2033, but on further investigation of the method used to calculate this OAHN it is clear that the figure should actually be 15,520 new homes (776 per annum) during this period.

We fundamentally disagree with the Council’s decision to reduce the starting point for calculating Tendring’s OAHN based on Unattributable Population Change (UPC) between the 2001-2011 censuses. We understand that official population projections between 2001 and 2011 overestimated the actual population growth in the district, but in light of the Office for National Statistics decision to not make any adjustment to the 2012 or 2014-based Sub-National Population Projections (SNPP) to account for UPC (since it could not be demonstrated that UPC measured a bias in the trend data that will continue in the future), we consider the Council’s approach wholly unjustified. In reducing the starting point for their OAHN based on UPC, the Council ignores the Government’s official published projections in the 2014 SNPP of 675 dwellings per annum, which accounting for the 15% uplift applied by the Council to populations projections gives an OAHN of 776 dwellings per annum or 15,520 dwellings across the plan period.

Given that the plan period for the emerging Tendring Local Plan continues to 2033 and planning policy requires regular reviews of this plan, it is considered that there is no reason not to use the SNPP for calculating OAHN. The next Census will take place in 2021 and if this reveals a lower level of population growth than that contained in the 2014 SNPP, then future reviews of the plan can take account of this. At this stage, not using the SNPP as the OAHN starting point risks severely underestimating the housing need in the district and would lead to a significant undersupply in housing of over 4,500 dwellings.

Policy SP3 and Policy LP1 should therefore be amended to require 15,520 new homes in Tendring District over the plan period, or 776 new homes per annum, and additional sites should be found to accommodate this housing growth.

### **Housing Supply – *Objection to Policies SP7, SP8 and LP1***

We wish to raise concern regarding the level of housing supply the Council is predicting to come from the Tendring Colchester Borders Garden Community by 2033.

**Policy SP7 – Garden Communities** and **Policy SP8 Tendring Colchester Borders Garden Community** identify the proposed Tendring Colchester Borders Garden Community as delivering 2,500 new homes within the plan period (as part of an overall total of between 7,000-9,000 homes to be delivered beyond 2033) and **Policy LP1 – Housing Supply** identifies that 1,250 of these new homes will be delivered in Tendring (with the remaining 1,250 coming forward in Colchester).

The supporting text to Policy SP7 states at that Development Plan Documents (DPD) will be developed for each of the 3 new garden communities planned in North Essex and Policy SP8 states that a Strategic Growth DPD will set out the nature, form and boundary of the new community, together with a phasing and implementation strategy to ensure that the respective phases of the development do not come forward until the necessary infrastructure has been secured. The DPD will provide the framework for the subsequent development of more detailed masterplans and other design and planning guidance.

The Council's current Local Development Scheme (LDS, January 2017) predicts that the Local Plan will be adopted in September 2018 and that following this the Tendring Colchester Borders Garden Community Strategic Growth Development Plan Document (DPD) will be adopted in March 2019. No details of the proposed DPD are currently in the public domain and the first planned consultation (Preferred Options) is planned for October 2017. Following this it is planned that a publication version will be published in June 2018 ahead of submission in October 2018, examination will take place between October 2018 and February 2019 and adoption will be in March 2019. This is a very tight timescale for the production of any development plan document, not least a document for which the boundaries of the proposed settlement have not yet been finalised and which has to agree a phasing and implementation strategy for 9,000 new homes across two local authority areas.

In the context of the unrealistic policy development timeline for the Tendring Colchester Borders Garden Community, it recommended that the predicted delivery rates are reduced accordingly. A more realistic timescale for the development of the DPD is considered to be adoption by mid-2020. Following this, the project would need to secure planning permission before it starts to deliver housing. A recent report from Lichfields (<http://lichfields.uk/media/1728/start-to-finish.pdf>) identifies that the average period from the submission of a planning application to the start of delivery is 6.9 years (6.1 years for approval and 0.8 years between approval and start on site for discharge of conditions) for schemes of 2,000+ dwellings following which the average annual build out rate is 161 dwellings. Based on the above, the scheme is predicted to deliver the following numbers during the plan period:

Year	Delivery
2020	Adoption of DPD
2021	Planning Application
2022	Planning Application
2023	Planning Application
2024	Planning Application
2025	Planning Application
2026	Planning Consent
2027	Conditions Discharge + delivery of 81 dwellings
2028	161 dwellings
2029	161 dwellings
2030	161 dwellings
2031	161 dwellings
2032	161 dwellings
2033	161 dwellings
<b>Total</b>	<b>1,047 dwellings</b>

The above figure is far below the Local Plan's predicted delivery of 2,500 dwellings during the plan period and would result in just over 500 dwellings to contribute to Tendring's housing supply against a prediction of 1,250. **Policies SP7** and **SP8** should therefore be amended to identify a predicted delivery of 1,000 homes from the Tendring Colchester Borders Garden Community during the plan period and **Policy LP1** should be amended to identify a delivery of 500 homes in Tendring.

It is clear from the above that there will be a need for several hundred new homes to be planned for in Tendring's emerging Local Plan as a result of overly ambitious housing supply forecasts at the Tendring Colchester Borders Garden Community. This is in addition to the additional homes needed as a result of the currently far too low OAHN.

### **Seaside Towns – *Objection to Vision for Tendring District***

We are concerned that Hopkins Homes' previous representations regarding the classification of Brightlingsea as part of the rural heartland as opposed to a seaside town have been ignored. Not only is Brightlingsea clearly a

seaside town with its long history as a port and its role as a popular tourist and recreation destination. It is comparable in size to the seaside towns of Jaywick Sands, Walton on the Naze and Frinton-on-Sea that are recognised as such in the emerging Local Plan and it shares many of the same opportunities and threats facing these other seaside towns in the district such as a need for regeneration and investment in the town centre and recreational/tourist facilities.

The policy approach to seaside towns and the rural heartland is contained in the **Vision and Objectives** part of the plan at **Section 2**. The Vision states that towns in the rural heartland will see modest levels of new housing and employment development to support local shops and services, address local issues, provide for local needs and facilitate investment by local businesses in job opportunities. The vision for seaside towns, however, is much more positive and includes a specific vision for each town setting out how the Council will seek to regenerate the area through additional housing development and a focus on improving town centres and recreational/tourist facilities.

It is clear that there is a need for such a positive vision to be developed for Brightlingsea and other comparably sized towns in the district, such as Manningtree, Lawford and Mistley, alongside a strategy for how development can be the catalyst for positive change. In the context of the above identified additional housing need and shortfall in supply, we consider there to be a unique opportunity to develop a new **Vision for Tendring District** that recognises the opportunities and threats facing the district's towns that have not been classified as 'seaside towns' (e.g. Brightlingsea and Manningtree, Lawford and Mistley) and most importantly the opportunity to use well planned residential development to deliver much needed regeneration and investment.

We trust that these comments will be given the due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact either myself or my colleague David Jones.

Yours sincerely



Geoff Armstrong   
**Director**  
**Armstrong Rigg Planning**  




