

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 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="ST OSYTH BEACH ESTATE"/>
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="MRS"/>
First Name	<input type="text" value="CATHERINE"/>
Last Name	<input type="text" value="POLLARD"/>
Organisation	<input type="text" value="BOYER"/>
Address Line 1	<input type="text" value="15 DE GREY SQUARE"/>
Address Line 2	<input type="text" value="DE GREY ROAD"/>
Address Line 3	<input type="text" value="COLCHESTER"/>
Post Code	<input type="text" value="CO4 5YQ"/>
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

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 ATTACHED REPRESENTATIONS.

Continue onto next page

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

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

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 the appropriate housing numbers for the District are applied and the development potential of Weeley Heath is properly explored.

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

Tendring District Local Plan 2013 – 2033 and Beyond: Publication Draft Final 2017

Representations on behalf of St Osyth Beach Estate Ltd

The following representations are made on behalf of St Osyth Beach Estate Ltd. in respect of their sites in both Weeley and Weeley Heath.

Submissions have been previously made under the names of Mr and Mrs Went, Mr Hutley and Mrs Molyneux to the Local Plan Issues and Options document in 2015, and the Preferred Options Draft in 2016.

As you will be aware from the previous submissions our clients own several sites within this area of the District and have contributed towards the meeting of annual housing land supply targets through the recent achievement of planning permission for developments on parts of a number of these sites.

Part 2 SPL1 – Managing Growth

We object to the Settlement Hierarchy expressed within Policy SPL 1, specifically with regards to Weeley and Weeley Heath being treated as separate entities. These adjoining villages share many of the same services and facilities, including the railway station, and have a significant amount of synergy between them. It should also be noted that the School, Church, Village Hall and part of the railway station are in fact located within Weeley Heath and, given the settlement's sustainable nature and proximity to facilities and public transport; it is recommended that Weeley Heath becomes a focus for further small scale growth. Indeed without the inclusion of Weeley Heath, we would question which services and facilities Weeley itself relies upon.

In this context Weeley Heath should not be classed as a Smaller Rural Centre as it provides and shares facilities with Weeley. The settlement should at the very least therefore be considered either jointly or separately as a Rural Service Centre to reflect the level of services and facilities accessible to the settlement. This justified change in categorisation would allow for appropriate smaller scale growth and an increase in housing stock, utilising potential to deliver further meaningful contributions to housing land supply which would otherwise not be fully realised. This will still represent sustainable development, supporting the village economy and contributing to the overall growth proposed for the District.

Part 1 SP3 Meeting Housing Need and Part 2 LP1 – Housing Supply

Part 1 Policy SP3 states that Tendring District Council will deliver 550 net additional dwellings per year, producing a minimum of 11,000 homes in the Plan period 2013-2033.

Part 2 Policy LP1 sets out the housing supply providing a total of 12,001 dwellings.

We object to both Policy SP3 and Policy LP1.

Supporting text to Policy SP3 indicates the starting point for the objectively assessed housing need is the 2014 demographic projections and this is welcomed.

The 2014 demographic projections provide a figure of 675 dwellings per annum (dpa) for Tendring District. The previous projections from 2012 set a starting point of 705 dpa which when assessed for unattributed

population change and with a market signal adjustment; the Objectively Assessed Housing Needs Study (2015) recommended an OAN range of 500-600 dpa, and adopted 550 dpa as the target where a single number was needed. With the 2014 projections providing a very similar figure, and the same reductions being applied the revised Objectively Assessed Housing Needs Study (2016) reasserted its position of 550 dpa being required. However, it can be assumed that the same range of 500-600 dpa can also be applied in this instance.

We are therefore concerned that the level of delivery set within the plan, of 550 dpa, underestimates housing need for the area, and that the higher figure of 600 dwellings per annum should be targeted, in line with the upper end of the range identified by the assessment of Objectively Assessed Need as part of the plan's evidence base. This is felt to more appropriately reflect the emphasis of the National Planning Policy Framework (NPPF) on increasing supply of housing. Paragraph 47 of the NPPF states that Local Authorities should significantly boost the supply of housing by ensuring Local Plans meet the full, objectively assessed needs for housing. This intention and the approach being pursued through the Local Plan must be made clear within this Policy as well as the District's housing strategy to ensure a clear set of proposed sources of housing supply can be conveyed as well as ensuring sufficient certainty through the Plan of delivering these houses.

In addition, Tendring District have only been able to demonstrate an average completion rate of 343.5 dpa between 2013 and 2017. The most recent Annual Monitoring Report (AMR) 2015/16 states the Council only has a 3 year supply of housing and due to existing shortfalls and persistent under delivery of housing the provision of a 20% buffer is included, in line with NPPF guidelines in Para. 47. This history of persistent under delivery highlights the need for the Council to provide sufficient supply of housing to meet the objectively assessed housing need for the District.

The sources for new homes set out within Policy LP1 include provision for 2,230 dwellings allocated through mixed use allocations including on land to the east of Weeley. As we have set out elsewhere in our submissions, growth at Weeley and Weeley Heath could be more appropriately achieved through the allocation of enhanced levels of growth spread more consistently across Weeley and to include Weeley Heath, in view of its existing levels of access to community facilities, and in a manner which avoids such a large extension into the open countryside.

Housing Allocations – Map 28 Weeley and Map 29 Weeley Heath

We object to the proposed housing allocation to the east of the settlement of Weeley within Map 28. This proposed allocation will be inappropriately located in terms of its size and impact on the village. Moreover, this proposed housing allocation would extend the built form into the open countryside, harming the rural character, and causing a negative effect on the surrounding area. This would be a very large extension to the existing village.

As an alternative it is strongly considered that the level of development envisaged at this settlement, and specifically that associated with this particular allocation should be spread across both Weeley and Weeley Heath, and in particular infilling the area to the north-west of the former Piggeries site at Willow Farm in Weeley Heath, south of Bentley Road and north of Mill Lane. A site plan is attached (Ref: 09.634/005). Utilisation of this site in its entirety (whilst still allowing for the provision of some element of public open space) would create a link with existing planning permissions recently approved in Bentley Road (16/00186/OUT) and Mill Lane/Rectory Road (16/00183/OUT) in a suitable and sustainable manner, providing a more logical future development boundary for the heart of the settlement. This scale of development is generally in keeping with the prevailing character of the area and is more suitable than that currently identified to the east of Weeley, as noted above. In particular, infilling of this site, in the context of recently approved developments would avoid the extension of built development into the open countryside or the harming of the surrounding rural area.

It is also considered that further scope exists for an additional area of infill development on land to the east of Rectory Road and south of Mill Lane, lying immediately to the south of the recently approved development at the northern end of this parcel (16/00185/OUT). A site plan is attached (Ref: 09.634/003). Used in its entirety (whilst similarly still allowing for the provision of an area of public open space and associated landscaping) this would have potential to tie in with the proposed redevelopment of the Kidby's Nursery site, which has recently been approved (16/00677/FUL) and which extends the line of development beyond the existing settlement boundary. This would also enable links to be established with the existing employment site to the south, located to the rear of the Old Rectory (Site plan attached ref: 09.634/002). As the Kidby's Nursery site and the employment area are previously developed land, development of those sites in combination with land to the east of Rectory Road and South of Mill Lane (ref: 09.634/005) would achieve infilling between areas of existing built development without representing further incursion into the open countryside, and indeed limiting the requirement for release of greenfield land resources.

This would provide an alternative to the overdevelopment of the eastern edge of Weeley without building up further congestion through the village itself, siting development where it is able to access the existing facilities and services, including public transport.

We therefore object to Map 28 and suggest it is redrawn to remove the proposed housing allocation to the east of the village and the settlement development boundary brought back in line with the existing settlement for the preservation of the rural character of Weeley.

We object to Map 29 and suggest the settlement development boundary is redrawn to include land to the north-west of Willow Farm between Bentley Road and Mill Lane. This will provide a natural infilling opportunity within the wider confines of the existing settlement, as opposed to extending into the open countryside, and linking with recent consents at Mill Lane and Rectory Road. Furthermore land on the eastern side of Rectory Road should also be included, representing a further opportunity to not only infill between existing areas of development, but to utilise areas of previously developed land.

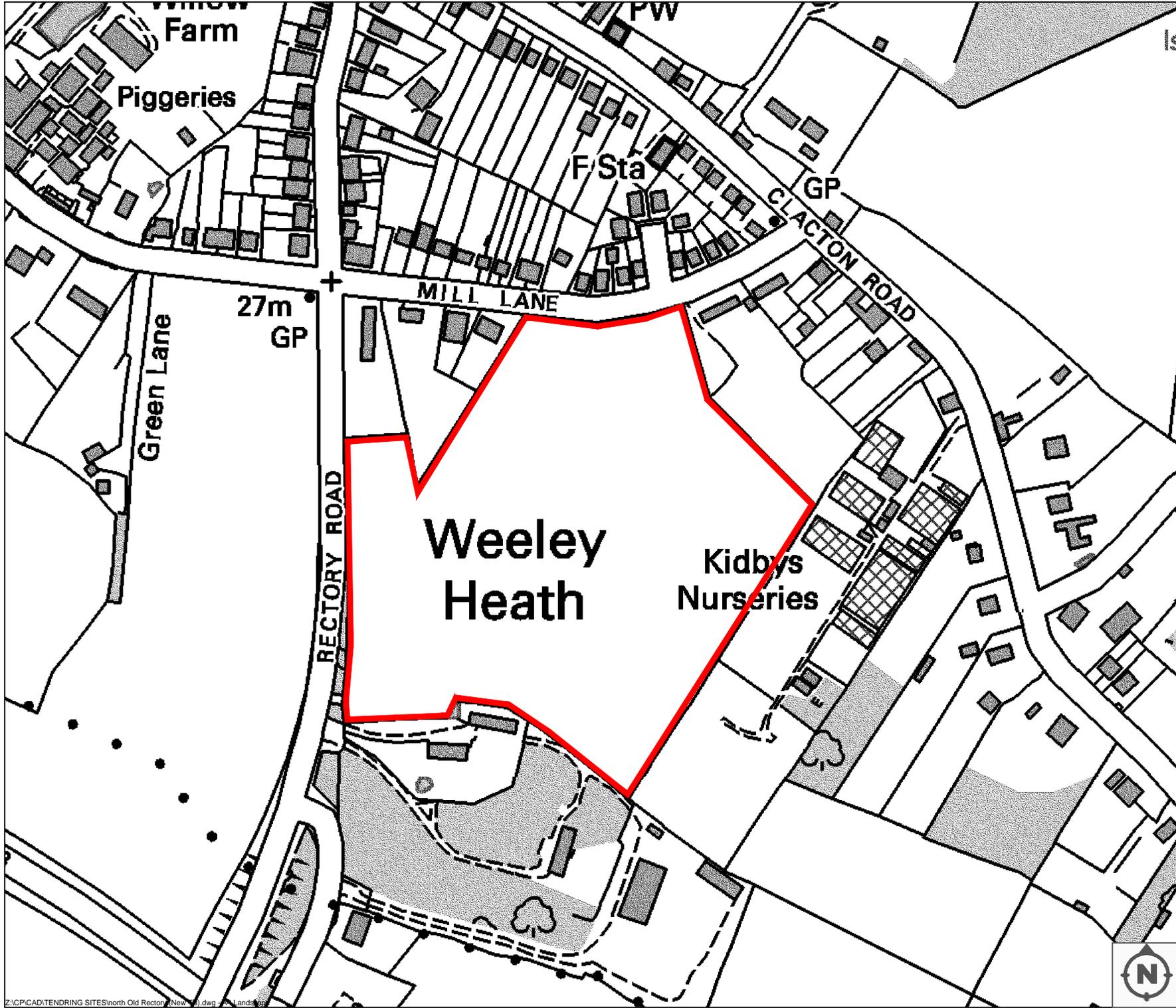
These suggestions will be a much more viable and sustainable alternative to that of the housing allocation proposed at land east of Weeley. We object to Map 28 and 29 within the proposed Local Plan.

In addition to these suggested alternative allocations it is noted that there are a number of anomalies in the drawing of the settlement boundaries for these settlements, particularly in respect of the manner in which recent planning permissions have been reflected. It is noted that the Map for Weeley Heath has included the recent approved scheme south of Mill Lane and west of Rectory Lane, as well as the outline consent on the south side of Mill Lane, east of Rectory Lane, which is welcomed and seems to represent a logical response.

The settlement development boundary should be redrawn to also include the recent outline consent for up to 9 dwellings at land adjacent to the crematorium (16/00182/OUT). This represents a sensitive scale of development infilling between existing commercial uses and the urban edge of Weeley which should be reflected within the proposals map.

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July 2017



LEGEND

Site Boundary

REV	DATE	DESCRIPTION	CP	DRAWN
-	08/07/16	First Issue		

CLIENT
St Osyth Beach Estate Ltd

PROJECT TITLE
East of Rectory Road
Weeley Heath

DRAWING TITLE
Site Plan

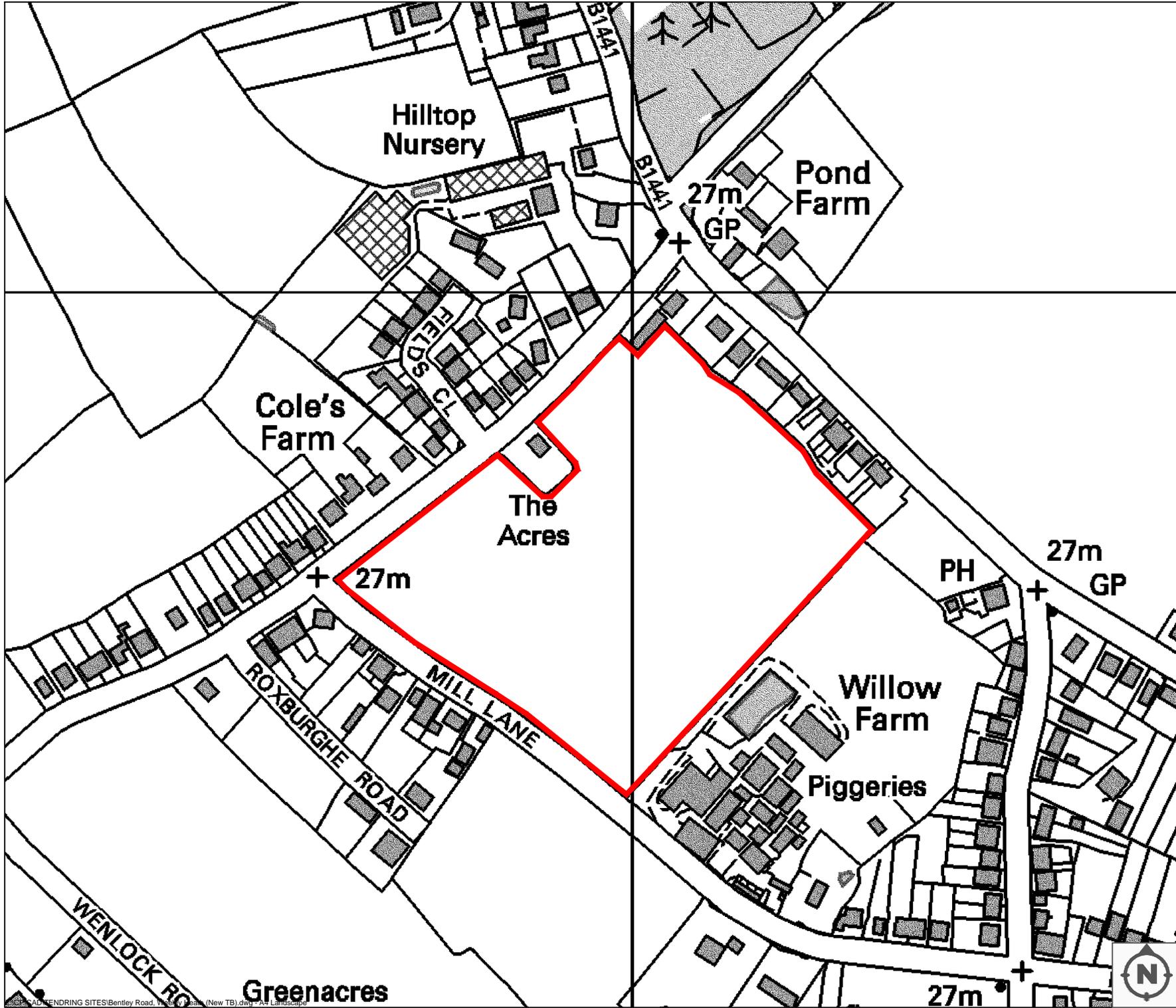
DATE	DRAWN	CHECKED	AUTHORISED
08 SEP 2016	CP	MC	MC
NUMBER	REV.	SCALE	
09.634/003		1:5000 @ A4	

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LEGEND
Site Boundary



REV	DATE	DESCRIPTION	DRAWN
-	08/09/16	First Issue	CP

CLIENT
St Osyth Beach Estates Ltd

PROJECT TITLE
Bentley Road, Weeley Heath

DRAWING TITLE
Site Plan

DATE	DRAWN	CHECKED	AUTHORISED
08 SEP 2016	CP	MC	MC
NUMBER	REV.	SCALE	
09.634/005		1:5000 @ A4	

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