

## **Tendring District Publication Draft Local Plan Consultation – 16<sup>th</sup> June to 11<sup>th</sup> August 2017**

### **Representations on behalf of NEEB Holdings**

NEEB Holdings would like to make the following comments in connection with Tendring District Council's Publication Draft Local Plan Consultation. The relevant parts of the Local Plan document and evidence base documents are reproduced (black text) and are followed by NEEB Holdings comments/representations (red text).

### **Tendring District Publication Draft Local Plan**

#### **SP3 – Meeting Housing Needs**

- Tendring Plan period 2013-2033; 550 new dwellings needed per annum; minimum net additional homes in the plan period are 11,000.

Response: NEEB Holdings supports the Council's housing figures and considers that the provision of 550 new dwellings per annum and 11,000 dwellings over the plan period should be treated as the minimum provision, and that every effort should be made to meet this minimum provision. Overprovision should not be discouraged.

#### **SP4 – Providing for Employment**

Tendring 2016-2033 will provide 20ha of B use employment land (up to 38ha in the higher growth scenario).

Response: It is unclear why Tendring's requirement for Employment Land should have halved from 40ha to 20ha since the Preferred Options Plan was published in September 2016. NEEB Holdings believes the provision of appropriately located designated employment land is vital to economic growth in the district.

It is noted that the Policies Maps (section 12 of the Plan) show proposed employment sites designated at the edges of existing towns such as Clacton and Harwich. There seems to be an under-provision of employment land within rural areas, particularly along designated strategic transport routes such as the A120 corridor. A lack of evenly distributed employment sites throughout the rural areas of the district does not seem to be a sustainable approach or consistent with national policy, since it encourages long distance commuting for residents of the district's rural areas.

According to the Employment Land Review (Aspinall Verdi, May 2016), which forms part of the draft plan's evidence base:

- 38ha of land needs to be allocated "to provide an effective supply of employment land" (paragraphs ES44 and ES45).
- At the time the report was written 19.4ha of land had been identified for allocation, leaving a further 19ha needing to be allocated.
- Paragraph 7.15 states that "The emerging Local Plan needs to bring forward more employment land and buildings that can provide proximity to the A12/A120 and Colchester."

It seems that policy SP4 and allocations in draft form fail to comply with the evidence base, indicating that this policy is not justified and therefore unsound. Further, the policy does not comply with the following parts of the National Planning Policy Framework:

- Paragraph 7 on ensuring sufficient land is available to support growth;
- Paragraph 17 stating that planning authorities should proactively drive and support sustainable economic development.

NEEB Holdings believes that the Local Authority should look again at the requirement for and distribution of employment land throughout the district. The proposed allocations do not appear to have been positively prepared and do not appear to be consistent with national policy. Further

employment sites in rural areas with strong transport links, such as along the A120 corridor, should be allocated in order to meet the requirements set out in National Planning Policy and the Employment Land Review. NEEB Holdings believe that their site at the A120 west of Little Bentley should be allocated for employment or transport services, as set out later in this response.

### Essex County Council Route-Based Strategies

1.67 Route-based strategies are prepared and delivered by the County Council for strategic road corridors, in consultation with local authorities. The following strategies relevant to North Essex are currently being prepared for delivery post 2018/19: A131 - Chelmsford to Braintree; A131 Braintree to Sudbury; Colchester to Manningtree and A133 Colchester to Clacton. The key objective is to identify options that will support economic growth.

Response: NEEB Holdings acknowledges the importance of the A120 to the Tendring's economy and the economies of surrounding districts and boroughs. NEEB Holdings fully supports any upgrading works to the A120 for this reason. This includes the construction of a roundabout at the junction of Harwich Road and Park Road (west of Little Bentley).

NEEB Holdings supports the aims of the route based strategies but would like to see better services for drivers and passengers along the route, in accordance with NPPF paragraph 31. The creation of a roundabout west of Little Bentley provides an excellent opportunity to provide a local service area for the benefit of all road users. This would provide a convenient stopping/service point between Colchester and Harwich and would be beneficial both from the point of view of servicing existing economic activity in the local and wider areas and generating new economic activity in the local area.

### SPL1 – Managing Growth Settlement Hierarchy

Strategic Urban Settlements	Rural Service Centres	
Clacton-on-Sea (comprising, Central Clacton, Jaywick, West Clacton, Great Clacton (North), East Clacton and Holland-on-Sea) Harwich and Dovercourt (including Parkeston and part of Ramsey) Tendring/Colchester garden settlement	Alresford Elmstead Market Great Bentley Little Clacton St. Osyth; and Thorpe-le-Soken Weeley	
Smaller Urban Settlements	Smaller Rural Settlements	
Frinton, Walton and Kirby Cross Manningtree, Lawford and Mistle Brightlingsea	Ardleigh Beaumont-Cum-Moze Bradfield Frating Great Bromley Great Holland Great Oakley Kirby-le-Soken Little Bentley Little Bromley	Little Oakley Ramsey Village Tendring; Thorpe Station Maltings Thorrington Weeley Heath Wix Wrabness

Response: NEEB Holdings supports the proposed hierarchy as a sensible and sustainable way to allocate growth across the district. However, NEEB Holdings would like to stress the important role that new development outside of defined settlement boundaries can have in certain cases, e.g. certain agricultural and equine related development, growth of existing businesses and development to provide services for users of key highway routes.

### 3.2.3 Settlement Development Boundaries

3.2.3.1 To achieve a sustainable increase in housing stock, a significant number of new homes will come forward on sites which at March 2017 already had extant planning permission for new housing. The remaining requirement will be delivered on sites that are specifically allocated for housing or mixed-use development, supplemented by other suitable sites within the Settlement Development

Boundaries in this Local Plan. Alongside the planned developments, it is likely that a number of currently unidentified 'windfall' sites will obtain planning permission for housing in accordance with the policies in this Local Plan during the plan period. In general terms, development outside of defined Settlement Development Boundaries will be the subject of strict control to protect and enhance the character and openness of the countryside. However, there are certain forms of development that can and sometimes need to take place in these areas, some of which can bring about positive outcomes for the rural economy.

**SPL2:** To encourage sustainable patterns of growth and carefully control urban sprawl, each settlement listed below is defined within a 'Settlement Development Boundary' as shown on the relevant Policies Map and Local Map. Within the Settlement Development Boundaries, there will be a general presumption in favour of new development subject to detailed consideration against other relevant Local Plan policies and any approved Neighbourhood Plans.

Outside of Settlement Development Boundaries, the Council will consider any planning application in relation to the Settlement Hierarchy and any other relevant policies in this plan.

An exemption to this policy is provided through the Rural Exception Site Policy LP6.

**Response:** NEEB Holdings believes it is important that settlement boundaries are allowed to shift over time and remain flexible in order to reflect housing needs, community views and changing economic circumstances. Further, it is important to recognise that there are circumstances where development outside of settlement boundaries is appropriate and necessary/desirable. Such circumstances may include certain agricultural and equine related development, growth of existing businesses and development to support key transport infrastructure and its users.

## **8.2 Improving the Transport Network**

**8.2.1** An efficient and effective strategic transport network is critical for achieving economic growth, supporting trade and attracting inward investment, and reducing carbon emissions to help to reduce increases in global warming. Conversely, a network which is unsafe, slow or inconvenient can deter business investment and could harm the area's tourist economy, which attracts many thousands of visitors, particularly during the main summer holidays.

**NEEB Holdings supports the promotion of land for employment and roadside facilities.**

**8.2.2** The Council will work with its partners, including Highways England, 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.

**Response:** NEEB Holdings supports the commitments and statements in this paragraph. NEEB Holdings also supports the proposals to create a roundabout west of Little Bentley on the A120 as part of these improvement plans. The creation of a roundabout provides an excellent opportunity to for the Council to review, together with its partners, the provision of services for users of the A120 between Colchester and Harwich.

The creation of a local service area at this location for the benefit of all road users would provide a convenient stopping/service point between Colchester and Harwich and would be beneficial both from the point of view of servicing existing economic activity in the local and wider areas and generating new economic activity in the local area. This would also conform with paragraph 31 of the NPPF on the support of roadside facilities to promote sustainable development.

**8.2.3** The major roads forming part of the District's strategic transport network are the A120 and A133. Both routes include sections which require upgrading in order to improve safety and convenience and to function efficiently in the context of significant future housing growth. For the A133, between Colchester and Clacton, the Council will work with Essex County Council (the

Highway Authority) to identify the nature and cost of improvements needed, seek sources of public funding and consider the use of the Community Infrastructure Levy (CIL) to secure contributions towards these works. An upgrade of the A120 is a requirement of the planned port expansion at Bathside Bay, Harwich although this is not expected to take place early in the plan period. The Council will work with Highways England and other partners to investigate ways of funding and delivering possible early improvements and will resist any development proposals in the vicinity of the A120 which could jeopardise its upgrading, widening or re-routing.

**Response:** NEEB Holdings supports the commitments and statements in this paragraph, especially in relation to the stretch of the A120 between Colchester and Harwich. This is a route which is of key economic development significance and which is certain to become more so. Any improvements to this route (including the provision of high quality services for road users in line with paragraph 31 of the NPPF) would make an important contribution to economic development objectives in the Tendring and surrounding areas.

**8.2.4** Major growth areas in West Tendring / East Colchester and Clacton will require new strategic highway infrastructure, which will not only serve the development areas themselves but also provide for two major new roads, to ensure that traffic is able to move through and between settlements efficiently, thereby preventing traffic congestion which would otherwise occur. These two new roads will be between the A120 and A133 and at west Clacton between the A133 and B1027.

**8.2.5** 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. Any new developments likely to increase use of this route may be required to contribute towards such improvements.

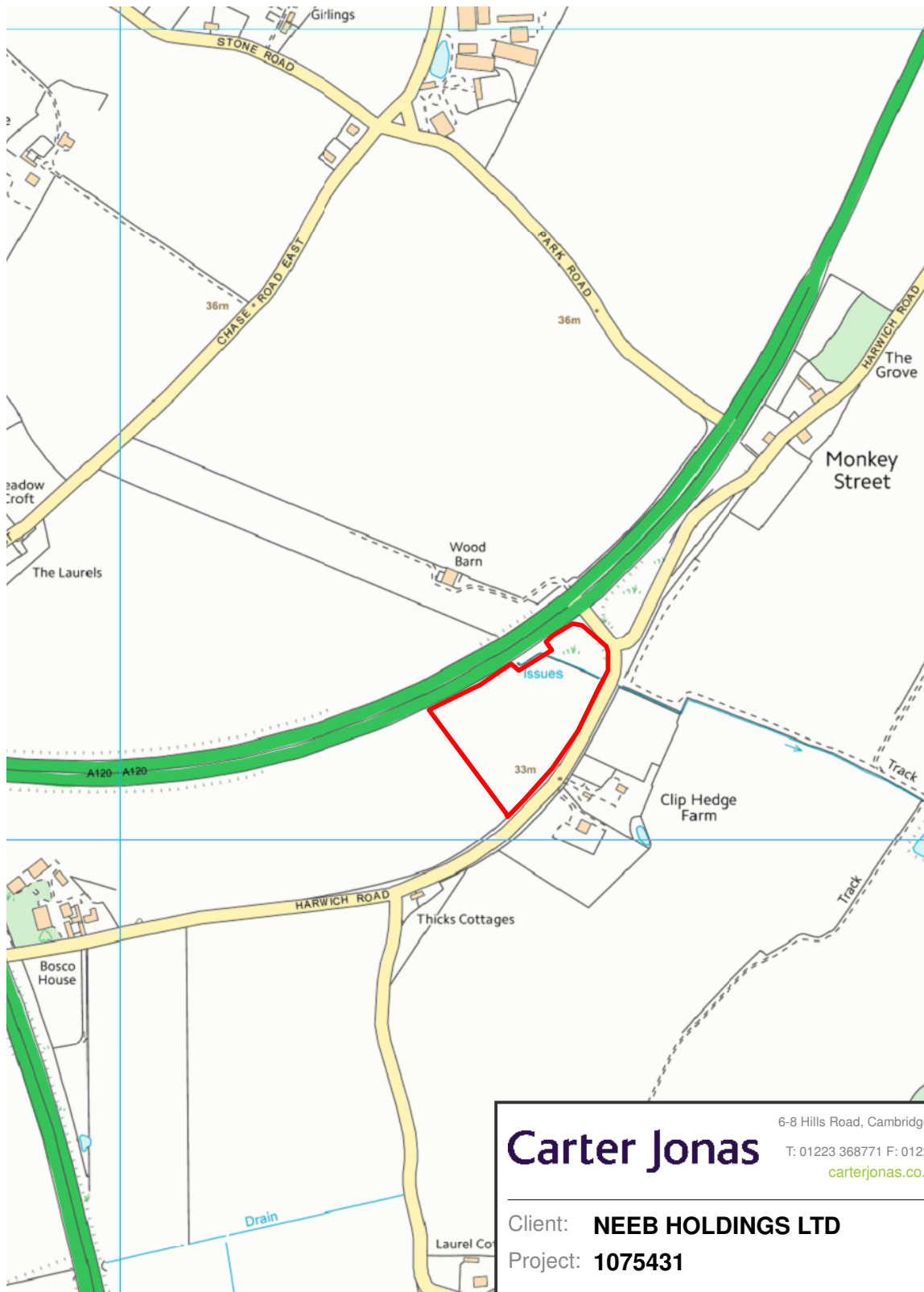
#### **Policy CP 2 IMPROVING THE TRANSPORT NETWORK**

- *Proposals for new development which contribute to the provision of a safe and efficient transport network that offers a range of transport choices will be supported.*
- *Major growth areas at the Colchester Fringe (East Colchester/West Tendring) and at Clacton will require provision of new road infrastructure in order to fully serve the new growth areas and to avoid causing traffic congestion in the existing adjacent settlements. Strategic link roads will be required between the A120 and A133 and between the A133 and B1027, respectively in addition to improvements for non-motorised travel. .*
- *Proposals which would have any adverse transport impacts will not be granted planning permission unless these are resolved and the development made acceptable by specific mitigation measures which are guaranteed to be implemented.*

**Response:** NEEB Holdings supports the Council's stance on new development which will contribute to the provision of a safe and efficient transport network. NEEB Holdings believes there to be the potential to provide safety and efficiency gains, and other benefits, in relation to the A120 between Colchester and Harwich through an appropriately sited new local service area at the new roundabout to be created west of Little Bentley.

- There are currently no service stations on the A120 between Ardleigh South and Harwich, a distance of some 14 miles.
- The A130 by comparison is much better provided for, with services near Great Bentley, Weeley and Clacton.
- The 2.2ha site between Harwich Road and the A120, west of Little Bentley, would be a suitable site for such provision. The site has no ecological, environmental, ownership or access constraints. The site is available within the next five years.

NEEB Holdings support the allocation of the site between Harwich Road and the A120 for servicing/employment use and would be pleased to work with the Council in exploring the potential for such provision in order to strengthen and improve this key economic corridor.



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Client: **NEEB HOLDINGS LTD**

Project: **1075431**

Title: **Land on the south side of Harwich**

Scale: 1:7500 @A4 Date: 23 October 2015

Drawn by: JRS Dwg no: **003**