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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="Taylor Wimpey UK Ltd."/> |
| Address Line 1 | <input type="text"/> |
| 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="S"/> |
| Last Name | <input type="text" value="Brown"/> |
| Organisation | <input type="text" value="Woolf Bond Planning"/> |
| Address Line 1 | <input type="text" value="The Mitfords"/> |
| Address Line 2 | <input type="text" value="Basingstoke Road"/> |
| Address Line 3 | <input type="text" value="Three Mile Cross"/> |
| Post Code | <input type="text" value="RG7 1AT"/> |
| 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

See attached covering submission

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 supporting Covering Letter.

Continue onto next page

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

The representations relate to the following:

- Policy SP3: Meeting Housing Needs
- Policy SP4: Providing for Employment and Retail
- Policy LP1: Housing Supply
- Appendix B: Map B.28 – Weeley

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

See Supporting Covering 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

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



Woolf Bond Planning

Chartered Town Planning Consultants

Our ref: SB/TR/7500

Email: [REDACTED]

27th July 2017

Planning Policy Manager,
Tendring District Council,
Thorpe Road,
Weeley,
Essex,
CO16 9AJ

Dear Sirs,

Tendring District Local Plan 2013-2033 and Beyond (June 2017) Representations Submitted on Behalf of Taylor Wimpey UK Ltd.

Introduction

We refer to the above consultation document and write on behalf of our client's, Taylor Wimpey UK Ltd., setting out a number of comments upon certain of the policies and proposals contained therein.

Our representations relate to the following key policies:

- Policy SP3: Meeting Housing Needs
- Policy SP4: Providing for Employment and Retail
- Policy LP1: Housing Supply
- Appendix B: Map B.28 – Weeley

Plans and particulars are enclosed in support of our representations as follows:

- i. Duly Completed Response Form
- ii. Illustrative Masterplan No. CSA/2632/113/A (CSA Environmental)
- iii. Location Plan No. CSA/2632/102/B (CSA Environmental)
- iv. Transport Assessment (i-Transport)
- v. Proposed Access No. ITL11228-SK-006/B (i-Transport)

The National Planning Policy Framework (NPPF) and the Tests of Soundness

The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.

Effective means the document must be deliverable, flexible and be able to be monitored.

The positive preparation test also requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.

For the reasons set out below there are a number of shortcomings with the plan, as currently drafted, that result in the need for amendment. These amendments relate to the need to increase the level of housing provision; a need to meet existing housing needs in the earlier part of the plan period and acknowledgement that the existing supply of housing commitments are insufficient in both quantum and nature to meet these more immediate needs. These concerns require the need to reconsider the proposed spatial strategy and identify additional allocations within the plan.

Our clients have a controlling interest in land to the north of Colchester Road, Weeley. The site is available, suitable and deliverable to meet important housing and employment needs in the immediate period of the Local Plan. We remain committed to further engagement with the Council to explore the option of a deliverable allocation on this site, such that it can be incorporated into the final version of the Local Plan.

Policy SP3: Meeting Housing Needs and Policy LP1: Housing Supply

National Policy Context

The NPPF requires LPAs to ‘*use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework (para 47)*’.

The NPPF makes it clear at paragraph 47 that in significantly increasing the supply of housing Local Planning Authority (LPAs) should meet the full requirements for market and affordable housing. The NPPF states that when determining the local level of housing provision LPAs are required to take into account evidence of current and future levels of need and demand for housing and affordability levels. Further the NPPF requires LPA’s to ‘*prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries*’ (para 159).

Paragraph 47 thus requires LPAs to *'boost significantly the supply of housing'* and identify a five year supply of deliverable housing land. Finally the NPPF requires LPA's to *'identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should **increase the buffer to 20%** (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land'*.

The delivery of housing is seen as a matter of national priority and there have been various recent statements both by the Chancellor of the Exchequer and other Ministers of DCLG indicating the importance of housing delivery and the benefits of the same to both National and Local economies. Such statements are reaffirmed in the Secretary of State's recent Housing White Paper.

This objective is clearly reflected in the Government's aim of kick-starting the economy and a commitment to investing £10 Billion in new housing to boost the national economy. This is acknowledged in the Secretary of State's Written Statement on 'Housing and Growth' (dated 6th September 2012) that states:

"The need for new homes is acute, and supply remains constrained. There are many large housing schemes in areas of high housing demand that could provide real benefit to local communities once delivered. But, large schemes are complicated and raise a wide range of complex issues that can be difficult to resolve."

More recently, the Government has referred to the existence of a nationally identified housing crisis¹.

The appropriate guidance to the derivation of a "Sound" evidence underpinning the assessment of an objectively assessed housing requirement is set out at paragraphs 47, 50, 154, 156, 157, 158 and 159 of the NPPF and requires as follows:

- Ensure that the Local Plan meets the full objectively assessed needs for market and affordable housing in the HMA (Para 47).
- Plan for a mix of housing based on current and future demographic trends, market trends and needs as well as identifying the range of housing that is required (Para 50).
- Local Plans should address the spatial implications of economic and social change (Para 154).
- The Local Plan should set out the strategic priorities and policies for the area, including in relation to the homes and jobs needed (Para 156).

¹ In the House of Commons Debate on 24 October 2013, the Planning Minister, Nick Boles, reaffirmed that there is a national housing crisis.

- Crucially Local Plans should plan positively for the development required in the area to meet the objectives, principles and policies of this Framework (Para 157).
- Each LPA should ensure that the Local Plan is based on adequate, up to date and relevant evidence about economic matters (Para 158).
- LPAs should have a clear understanding of housing needs in their area and should prepare a SHMA to assess their full housing needs. The SHMA should, inter alia, meet household and population projections taking account of migration and demographic change and address the need for all types of housing (Para 159).

The guidance set out in the NPPF in so far as it relates to the identification of an objectively assessed housing requirement is supplemented by that set out in the more recent advice contained in the National Planning Policy Guidance (NPPG) (March 2014).

The Local Plan section of the NPPG confirms that:

‘The Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered’.

In all of the circumstances the need to provide for and address housing delivery is an issue which must be viewed both positively and urgently by LPAs.

The above is clear in setting out that a Local Plan should:

- Provide a delivery strategy that is clear in terms of where, when and how housing needs will be delivered over the full plan period;
- Meet full, objectively assessed housing needs for market and affordable housing; and
- Boost significantly the supply of housing and ensure a deliverable five year housing land supply with an appropriate buffer can be maintained at all times.

District-level Context and Proposed Housing Requirement

As set out in the Planning Practice Guidance (PPG), the household projections published by the Department for Communities and Local Government represent the starting point when undertaking an assessment of housing need (Paragraph: 014 Reference ID: 2a-014-20140306 refers). Thereafter, appropriate adjustments in order to reflect market signals, household formation rates and employment trends should be made.

We **object** to the Council’s decision not to use the CLG 2014 Sub National Population Projection figure of 675 dwellings per annum. Instead, the Council has sought to reduce the demographic starting point on account of Unattributable Population Change (UPC). The reasoning for this decision is set out at paragraphs 8.32 to 8.38 of the PBA Objectively Assessed Housing Need Study (November 2016) report that states:

‘In the July 2015 OAN study we assessed Tendring’s housing need over the plan period as 597 dpa. Like the OAN for the rest of the HMA, this was based on the job-led Employed Persons scenario in the Phase 7 Edge study. It was below the CLG 2012 household projections, which implied a ‘demographic starting point’ of 705 dpa. We found that an OAN lower than the official projections was justified in this case, because the projections were severely distorted by UPC, which is an error in the demographic official statistics. The Edge Employed Persons scenario aimed to correct this error, as well as checking that the projected population would provide enough workers to meet labour demand.

However, after the OAN study was completed and published the ONS released a report and data tool that provided further formation about the UPC. The new data suggested that the Edge Employed Persons scenario overestimated housing need, because it was based on the wrong age profile, with too many older people – who tend to live in smaller households.

Tendring Council commissioned PBA to review the findings of the OAN report in the light of the new information. The resulting report was published by the Council in January 2016, as an update to the 2015 OAN study. It recommended a revised ‘demographic starting point’ of 480 dpa for Tendring over the plan period. We advised that this number was the best estimate based on available information. But it should be used with great caution, because the size of the UPC made all demographic analysis potentially subject to large error.

With a market signal adjustment applied PBA recommended an OAN range of 500-600 dpa with 550 dpa adopted where a single number was needed. Testing of this number showed no need for any economic uplift. Testing of this number through the Experian model suggested that it did not require a ‘future jobs’ uplift

The November 2016 update

The 2014-based official projection sets a ‘demographic starting point’ for Tendring of 675 dpa. This is very close to the 705 in the same version of the projections. Our technical audit show that the 2014 projections are affected by the same errors as the 2012 ones, and hence they overstate housing need in the same way. The ONS is currently reviewing mid-year population estimates for the years since the 2011 Census, in order to eliminate these systematic errors. But the results will only become available in 2017.

For now, our analysis of the latest demographic data suggests that the correct ‘demographic starting point’ remains 480 dpa, with a large potential error. Our analysis of

past provision and market signals shows that Tendring's position has not changed, so we still consider that a market signals uplift to 550 dpa is justified. As before, Experian's analysis suggests that there is no need for 'future jobs' uplift.

In summary, our best assessment of housing need for Tending over the plan period remains 550 dpa'.

Two key points arise from the above statements:

1. First, the ability of PBA to revise the demographic starting point for Tendring is one that by PBA's own admission '*should be used with great caution*' and potentially one that could be '*subject to large error*'. The PBA report goes on to state that work is ongoing at CLG to eliminate systematic errors and these results will become available this year. It follows that as drafted the proposed housing requirement is predicated upon a revised demographic projection that by its own admission is subject to significant uncertainty. It follows that the use of the 480dpa figure is not predicated upon robust evidence. In such circumstances and given the imperative in national policy to boost the supply of housing, it follows that the only available figure to apply as a starting point at the present time is the CLG household projection figure of 675dpa. Such an approach is consistent with the PPG. The Council's alternative approach to modifying the demographic starting point is highly uncertain as to its accuracy. The proposed housing requirement therefore fails the justified, consistent with national guidance and effective tests of soundness for these reasons.
2. Second, the PBA report suggests that there is no need for a future jobs uplift to the proposed housing requirement. This position fails to consider the intrinsic relationship between employment and housing growth. We refer below to the findings of the Aspinall Verdi report that references the need for proactive interventions by the Council so to improve employment opportunities, in addition to the ability of residential development to cross-subsidise serviced and ready to develop employment sites. It follows that the housing requirement fails to adequately reflect a need for an increased housing requirement in order to support a need for economic and employment growth. The proposed housing requirement also therefore fails the justified and effective tests of soundness.

The Link to Employment Needs

The approach to employment growth in the District is informed by the content of the Employment Land Review ("ELR") prepared by Aspinall Verdi (May 2016) which reports the findings of a Study exploring the supply and demand of employment floorspace across the District.

Figure 6.6 of the Aspinall Verdi Report identifies our client's site as providing a sustainable opportunity to deliver employment land with good access and prominence (Para 7.34 refers). This reference was also carried forward to Local Plan Map C30 in the previous iteration of the Local Plan.

As identified in the Aspinall Verdi Report, there are viability factors that limit the “speculative” provision of new employment sites. This is acknowledged at paragraph ES23 of the Employment Land Review and the site’s SHLAA assessment which acknowledged viability as an issue. This was further evidenced by the lack of employment growth in the District.

The findings of the ELR relevant to the consideration of our client’s scheme may be summarised as follows:

- Paragraph ES16 identifies the need to bring forward additional employment land which can provide proximity to the A120 and Colchester.
- Paragraph ES19 identifies that the supply of new office space across the District in the 6 years 2009 to 2015 was limited to only 1,240sqm which is equivalent to 8 business units.
- Paragraph ES21 identifies that well located sites providing good access to the A12 and offering proximity to the University of Essex Colchester Campus and the Knowledge Gateway is an important consideration.
- ES22 identifies that the supply of B1 floorspace is limited.
- ES23 identifies that viability will be a factor in bring forward certain locations for business use, with a pro-active range of interventions needed across the District to improve performance.
- Paragraph 6.1 identifies the key locations for further employment growth, with the Application Site identified on page 82 and Figure 6.6 on page 83.
- Paragraph 6.42 identifies the site as being at the ‘gateway’ to Weeley and is suitable for employment development.
- Paragraph 6.48 refers to the possibility of residential development cross-subsiding serviced and ready to develop employment sites. This is a major positive attributed to higher value land uses such as housing development which can assist in bringing forward serviced employment land to meet the clearly identified need.
- Paragraph 6.49 refers to ancillary community uses to be included as part of the development proposals.
- Para 6.50 refers to the need for the Council to assist in bringing the site forward for employment uses as quickly as possible.
- Page 109 refer to the site as a potentially attractive location for employment.
- Paragraphs 7.27 and 7.33 highlight the merits of providing for employment growth at Weeley which is recommended as a priority.

The above confirms the pressing need for proactive intervention by the Council in order to boost employment opportunities in the District and the ability of residential development to cross-subsidise this. It follows that there is a need to increase the

housing requirement to allow for a future jobs uplift in the District contrary to the position taken in the PBA report (discussed above).

The above also acknowledges the benefits specifically of employment development at Weeley, specifically referencing our client's site. It follows that our client's scheme affords the opportunity to deliver a sustainable neighbourhood through the provision of new homes and much needed employment opportunities, with the scheme providing circa 6,250sqm of office space.

Affordable Housing Need

The table below sets out the number of gross affordable housing completions that have occurred over the first 3 recorded years of the plan period:

Table 1: Affordable Housing Delivery in Tendring District²

| Monitoring Year | Gross Completions |
|-----------------|-------------------|
| 2013/14 | 3 |
| 2014/15 | 16 |
| 2015/16 | 7 |

The average annual affordable housing delivery in the District during the plan period so far comprises 9 dwellings per annum. By comparison, and as at June 2015, the Council had over 1,000 households listed on their housing register³. This represents an acute problem.

It is apparent that the Council has under delivered in terms of affordable housing in an exceptional manner during the first 3 years of the plan period. To reinforce this exceptional under delivery, we note that at this average delivery rate, it would take over 100 years to clear the current housing register, notwithstanding inevitable additional households that would require listing in the intervening period.

Paragraph 47 of the NPPF requires LPAs to boost significantly the supply of housing and aim to meet 'full, objectively assessed needs for market and affordable housing'. It follows that there is a pressing and substantive need to increase the housing requirement to respond to this level of affordable housing need and allocate additional strategic sized allocations that can deliver policy compliant levels of affordable housing accordingly. As discussed below, one such opportunity forms our client's site at land to the north of Colchester Road, Weeley.

Summary regarding Overall Housing Requirement

Informed by the content of the PPG, the assessment work undertaken by PBA and the evidence set out above, we are of the view that the Local Plan should plan for growth at a minimum of 776 dwellings per annum, so to meet the 2014 SNPP household projection (675dpa), plus a 15% uplift to allow for market signals and thus totaling **776dpa**.

² Data taken from Council's AMRs.

³ <http://www.tendringdc.gov.uk/housing/private-rented-or-owned-housing/empty-homes> (accessed 24/07/2017)

As drafted, the proposed housing requirement fails all the tests of soundness.

Five Year Housing Land Supply

There is a need for the plan to demonstrate a five year housing land supply on the date of adoption. Any failure to secure this comprises an issue of soundness in respect of compliance with NPPF paragraph 47 and the objective of significantly boosting the supply of housing land and the requirement to demonstrate a five year supply.

The importance of demonstrating a five year housing land supply upon adoption, in order to achieve a sound plan, was noted by an EiP Inspector in examining the Canterbury District Local Plan:

‘The Framework indicates that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5-year supply of deliverable sites. As such, I consider that the Plan would be ineffective and not accord with national policy. It would therefore be unsound unless this can be remedied’.

The Council’s most recent assessment of housing land supply is set out in a Local Plan committee paper dated 19 January 2017, that identified the Council could only demonstrate a 4.4 year supply of housing.

In addition, the committee paper also provides the following net completions over the first four years of the plan period:

Table 2: Overall Housing Completions in Tendring District

| Monitoring Year | Tending Derived OAN @ 550dpa | Completions | Shortfall/Surplus |
|-----------------|------------------------------|----------------|-------------------|
| 2013/14 | 550 | 204 | -346 |
| 2014/15 | 550 | 267 | -283 |
| 2015/16 | 550 | 245 | -305 |
| 2016/17 | 550 | 540 (Estimate) | -10 |
| Total | 2,200 | 1,256 | -944 |

The cumulative position for the last 4 years results in a deficit of 944 dwellings which represents a substantial shortfall in housing delivery.

The position becomes more acute if one applies a housing target using a robust demographic starting point together with a market signals uplift (776dpa).

On the basis of the foregoing, there is a clear imperative to boost housing supply in the current five year period in order to address the acute shortage in housing delivery.

We reserve the right to comment upon the Council's components of supply in detail. However it is essential that the Plan identifies sites that can deliver within the early part of the plan period in order to meet the soundness requirement to demonstrate a 5-year housing land supply upon adoption. This becomes yet more essential when one considers the past under delivery in the District and the fact that the deficit position would only become yet more severe if a corrected increased overall housing requirement is applied.

Given the accrued shortfall that has accumulated over past monitoring years, including the substantial under provision in the delivery of affordable housing the Council should seek to meet this shortfall in the immediate five year period consistent with the 'Sedgefield' methodology which accords with the approach to boosting significantly the supply of housing land in accordance with the content of the NPPG which states "Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.

The consequence of failing to demonstrate a five year supply of deliverable housing land means that the Plan would be out of date at the point of intended adoption and could not be found sound.

Part of the necessary solution is to identify sites that can provide material boosts to the overall deliverable supply within the immediate five year period. Our client's proposal (see representations below) would enable two or more sales outlets to be established on the site and high levels of delivery be achieved (at a minimum of 60dpa per outlet).

Summary

The Local Plan should identify sufficient deliverable and developable sites to help meet at least the **776dpa** requirement during the plan period (15,525 dwellings in the period 2013 to 2033) whilst facilitating the early release of sites in helping to demonstrate a five year supply of deliverable housing land.

The NPPF is clear in requiring local planning authorities to identify sites which are deliverable (paragraph 47). The site can be considered deliverable in that development would be in line with Footnote 11 i.e. the site is available, able to offer a suitable location for development and ultimately is achievable.

Policy SP4: Providing for Employment and Retail

Including for the reasons set out in the Employment Land Review prepared as part of the supporting evidence base to the emerging Local Plan (Aspinall Verdi) (May 2016) (discussed in response to Policy SP3), we support the need for additional employment land allocations in helping to achieve a strong economy to accompany the planned levels of growth in the period to 2033. Moreover, providing for employment opportunities and housing choice in sustainable locations can help secure a sustainable pattern of growth.

Taylor Wimpey UK Ltd has a controlling interest in land that was previously proposed to be allocated for employment use to the north of Colchester Road at Weeley (Figure 6.6 of the Employment Land Review refers). The Employment Land Review identifies the site as providing a sustainable opportunity to deliver employment land with good access and prominence (Para 7.34 refers). However, and self-evident from the limited amount of employment land that has been developed in the recent past, there are viability factors that limit the "speculative" provision of new employment

sites. This is acknowledged at paragraph ES23 of the Employment Land Review and the site's SHLAA assessment which acknowledges viability as an issue.

Summary

We object to the proposed de-allocation of land to the north of Colchester Road, Weeley for new employment opportunities. However, we are of the view that this should be as part of a mixed use scheme to include additional housing development alongside community facilities including a local centre, land for a potential a 1FE primary school as well as additional public open space provision.

Additional and related representations are set out in response to Proposals Map B.28 (Weeley) below.

Appendix B: Map B.28 – Weeley

Land to the North of Colchester Road (SHLAA Site Ref: WE1.2)

Land controlled by Taylor Wimpey UK Ltd forms the majority of SHLAA Site WE1.2 located to the north of Colchester Road, Weeley. It extends to approximately 20ha.

As discussed in the accompanying Transport Assessment, the site is located within walking and cycling distance from local services and facilities including the train station. It is also accessible by bus.

The site is currently in agricultural use and is also used for car boot fayres.

In terms of topography, the site is generally flat.

The site is not located within or adjoining a Conservation Area. In addition, there are no listed buildings in or directly adjoining the site.

The wider area (to the east) is characterised by residential development, although there is no one dominant form of dwelling type or design.

The SHLAA concludes in relation to the extended site (including land to the north east not controlled by Taylor Wimpey and not forming part of this Local Plan submission) as follows:

| | |
|-------------------------------------|--|
| <i>Estimated dwelling capacity:</i> | <i>450 dwellings.</i> |
| <i>Physical constraints:</i> | <i>No irresolvable issues. Development would require a suitable access from the B1033 that would not reduce the flow of traffic on this busy road.</i> |
| <i>Environmental constraints:</i> | <i>no irresolvable issues.</i> |
| <i>Infrastructure constraints:</i> | <i>In conjunction with other large sites in Weeley, development would require a range of new transport, health, utilities and education infrastructure. A new primary school would need to be delivered as an integral part of the</i> |

development.

Other comments:

There are doubts over the suitability of this land for housing as it would introduce housing on the opposite side of a busy road and would protrude the settlement northwards into a relatively uncontained area of countryside that is poorly connected with the existing built up area.

The accompanying Illustrative Masterplan and Transport Assessment address the suitability concerns in relation to, inter alia, connectivity. The content of these supporting documents is summarised below.

The Illustrative Masterplan

The Illustrative Masterplan (No. CSA/2632/113/A) provides for the following form and layout of development:

- Approximately 380 dwellings
- A 2.8ha site for employment (to include a 0.5ha local centre)
- Access from Colchester Road as well as a pedestrian/cycle link from Crown Lane and Hawk Lane
- Land for a 1FE primary school (to accommodate 210 pupils in seven classes)
- Formal sports pitch provision
- Pedestrian links to the remainder of Weeley
- Pedestrian access across Colchester Road
- A form of development that is contained from wider views into and from the site by virtue of the existing boundary planting and the proposed landscape strategy.
- A layout of development that can be assimilated into the character of the area, providing for a sustainable extension to Weeley.

In landscape terms, the site benefits from screening from the adjacent woodland and the tree belts to the site boundaries which enclose the site.

The site lies on the north western side of the existing built up area of Weeley, immediately to the north of Colchester Road and consists of three fields which are bound by a mix of mature vegetation and existing woodland. The eastern boundary is formed by Hawk Lane which is flanked by mature tree planting to either side. The western field and middle field are separated by a shelter belt comprising a single row of trees.

The Illustrative Masterplan shows how new areas of landscaping in the form of tree planting and amenity landscaping could be incorporated into the design to ensure that development is integrated into the local context.

The Illustrative Masterplan provides for approximately 380 dwellings on a total developable area of circa 10ha equating to approximately 38dph.

The draft scheme also demonstrates how a new primary school could be accommodated on the site. The primary school site measures 1.09ha and guidance contained within Essex County Council's 'Education Contribution Guidelines Supplement' sets out that a 1.09ha site would be able to accommodate 210 pupils

within seven class bases. The Illustrative Masterplan shows how the primary school site could be located on one of the principal routes through the new development in order to maximise its accessibility for both new and existing residents.

Currently, the only primary school in the village is Weeley St Andrew's CofE Primary School. It is a one form entry school, located to the south of the village. The County Council, as the local education authority, has advised that the existing primary school at Weeley would not be able to accommodate the number of additional pupils expected as a consequence of substantial new housing, and that expansion options for the existing school are limited. In recognition of this, the proposals include provision for a new primary school site of 1.09ha, which is sufficient to accommodate a one form entry (210 pupil place) primary school together with early years provision. The proposed provision therefore facilitates additional primary education demand over and above what is required to meet the needs of the proposed development.

Optionally, the County Council has previously suggested a site for a two form entry school should be made available. This would require a larger area to be set aside for education use. While it is recognised that the County prefers to establish two form entry schools, there is no justification for requiring a school site suitable for accommodating a two form entry school and such provision could not be considered CIL-compliant. Consequently, a larger site would only be made available by agreement - the basis of which would need to recognise the land value of the additional land based on residential land value.

The proposed local centre is shown to be accommodated on a combined site of 0.5ha, located adjacent to the vehicular site access point from Colchester Road and forming part of the wider 2.8ha site for employment generating uses (including B1 and B2). Its location fronting Colchester Road would help to maximise the viability of a new retail use where it would benefit from passing trade along Colchester Road. Equally, its location adjacent to Colchester Road would maximise the accessibility of the employment area from the existing bus stops that are located nearby to either side of Colchester Road. The combined site would allow for the shared use of car parking and the creation of a vibrant space that would benefit from activity during both the daytime and evening.

Overall, the Illustrative Masterplan puts forward a vibrant form of development that will deliver a range of community benefits for both existing and new residents of the village. All of these new community facilities would be readily accessible from within the development and would be connected by a network of proposed recreational routes.

Transport Assessment

The accompanying Transport Assessment demonstrates the sustainability merits of providing for development of the site in the manner proposed, which includes accessible pedestrian, cycle and bus connections to the remainder of the settlement.

Summary

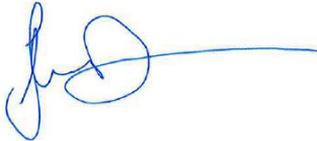
Land to the north of Colchester Road should be allocated for a mixed use scheme to include 2.8ha of employment land and approximately 380 no. dwellings in helping to meet identified needs during the plan period.

Summary

We trust the above comments are of assistance in producing a final version of the Local Plan for and await confirmation of receipt of our representations in due course. In addition, we welcome the opportunity to discuss the proposals for the site with the Council.

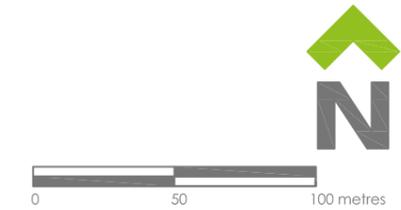
Please do not hesitate to contact the writer should you wish to discuss any matter(s) arising.

Yours faithfully,

A handwritten signature in blue ink, consisting of a stylized 'S' followed by a horizontal line extending to the right.

Steven Brown BSc Hons DipTP MRTPI

Enc.



Application Site Boundary:
20.32ha / 50.21 acres

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| | | | |
|-----|----------|-----|------------------------|
| B | 13/10/16 | SeM | Site Boundary amended. |
| A | 21/09/16 | AS | Site Boundary amended. |
| Rev | Date | By | Description |

CSA
 environmental
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 e ashwell@csaenvironmental.co.uk
 w csaenvironmental.co.uk

Project Land to the north of Colchester Road, Weeley

Title Site Location Plan

Client Taylor Wimpey UK Ltd

| | | | |
|--------------------|--------------|----------------|----|
| Scale | 1:2500 @ A3 | Drawn | AS |
| Date | Sept 2016 | Checked | RR |
| Drawing No. | CSA/2632/102 | Rev | B |



- Application Site Boundary
- Access and Movement**
- 1 Vehicular Access Point
- 2 Emergency/pedestrian/cycle access
- 3 Potential pedestrian/cycle link
- Existing public footpath
- Existing bridleway
- Proposed cycle/footway
- Proposed footways
- Uses**
- Proposed Residential Development Area: 10.66ha
Approx. 380 dwellings @ 36dph
- 4 Proposed 1 Form Entry Primary School: 1.09ha
- 5 Potential Employment Area: 2.8ha
To include:
0.5ha Local Centre
2.3ha Business Development Area (Approx. 6,250sqm business floorspace)
- 6 Equipped/designated play area (To include 1No. LEAP, 2No. Natural Play Areas)
- Landscaping**
- Existing vegetation
- Proposed landscaping
- Sustainable Drainage Systems(SuDS)**
- 7 Attenuation basin

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| Rev | Date | By | Description |
|-----|----------|----|-------------------------------|
| A | 02.11.16 | JC | Updated to reflect new layout |

CSA
environmental

Dixies Barns, High Street,
Ashwell, Hertfordshire SG7 5NT

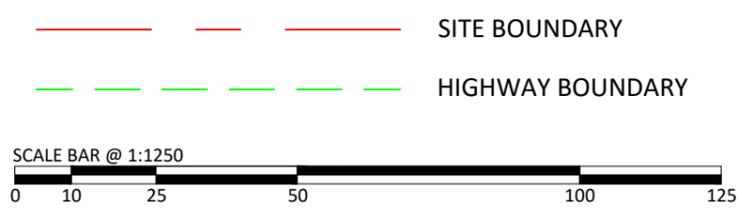
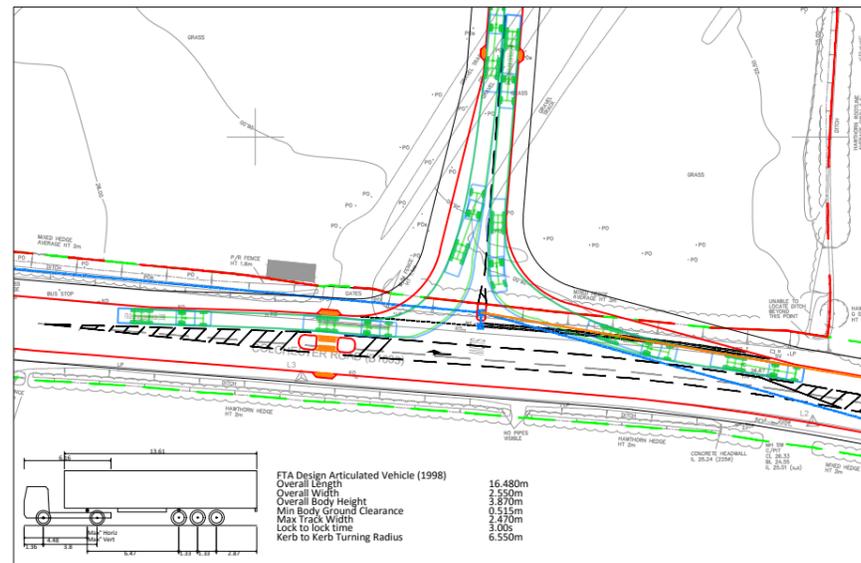
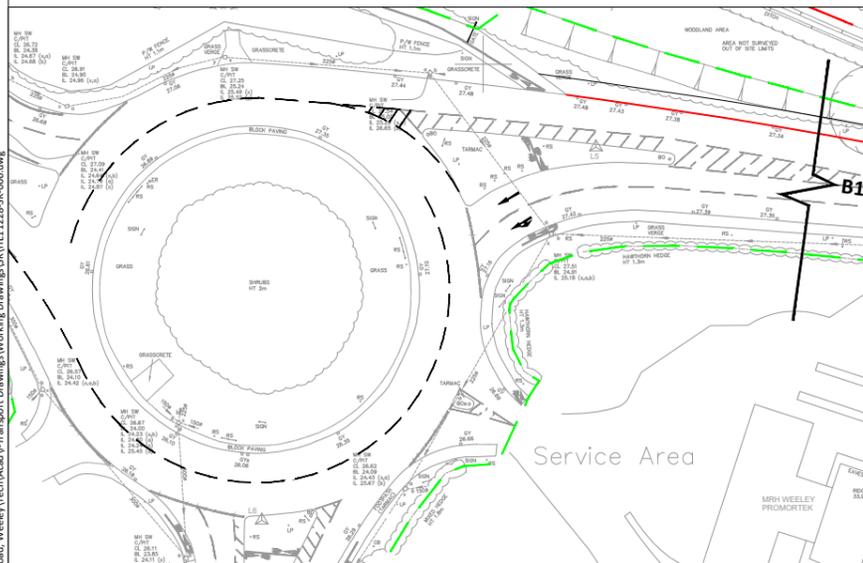
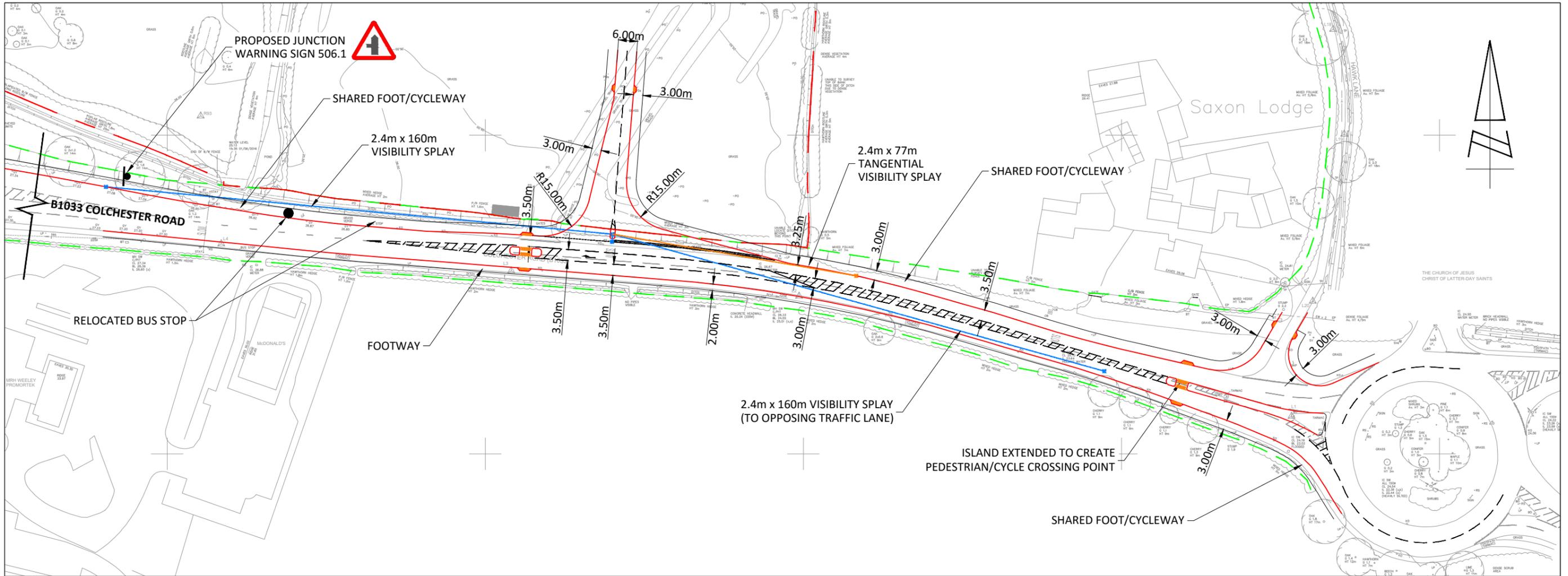
T 01462 743647
E ashwell@csaenvironmental.co.uk
W csaenvironmental.co.uk

Project Land to the north of Colchester Road, Weeley

Drawing Illustrative Masterplan
Title

Client Taylor Wimpey UK Ltd

Scale @ A1 1:1250 Drawing No. CSA/2632/113
Date October 2016 Rev A
Drawn AgB Checked RR



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4 Lombard Street, London, EC3V 9HD

Tel: 020 7190 2820
Fax: 020 7190 2821

www.i-transport.co.uk

| B | 17.10.16 | JN | MINOR AMENDMENTS | NM | NM |
|---------|----------|----|----------------------------------|-----|-----|
| A | 19.08.16 | RN | AMENDMENTS FOLLOWING STAGE 1 RSA | NM | NM |
| REV | DATE | BY | DESCRIPTION | CHK | APD |
| STATUS: | | | FOR PLANNING | | |

TITLE: PROPOSED ACCESS ON B1033 (50mph - 160m VISIBILITY) RIGHT TURN LANE (ALL MOVEMENTS)

PROJECT: LAND AT COLCHESTER ROAD WEELEY

CLIENT: TAYLOR WIMPEY

| | | | | | |
|-------------|-----------------|----------|----|-----------|----------|
| SCALE @ A3: | 1:1250 | CHECKED: | NM | APPROVED: | NM |
| FILE REF: | ITL11228-SK-006 | DRAWN: | RN | DATE: | 04.07.16 |
| DRAWING No: | ITL11228-SK-006 | | | | |
| PROJECT No: | ITL11228 | REV: | B | | |