



SOUTHCLIFFE TRAILER COMPANY LIMITED
10 SOUTHVIEW DRIVE
WALTON-ON-NAZE
ESSEX
CO14 8EP

VAT No: 549 9614 89

9th August 2021

Planning Policy
Council Offices
Thorpe Road,
Weeley
CO16 9AJ

Received On

10 AUG 2021

Dear Sir/Madam, **By Planning Services**

We the Directors of Southcliffe Trailer Company Limited are most surprised to learn that there is a new Local Plan now being discussed by the Planning Inspectorate to be released sometime in the near future.

We are also distressed to learn from our Architect that our land at Southcliffe, presently being traded as Southcliffe Trailer Park, 10 Southview Drive, Walton on Naze, CO 14 8EP., has been discussed without a single consultation with us, the Directors.

We enclose two copies of the previous **2014** and **2017** Local Plans for your information and for us to refer to in our quest for information.

You will be aware that we have endeavoured throughout our entire ownership of this land to trade as a holiday home park. We have involved the Tendring District Council in all of our trading decisions since our ownership begun in 1982 and we consider that together we have been reasonably successful as a home leisure caravan park for holidaying Owners from outside our area.

The overriding problem has always been the park land size, it is unfortunately just too small to accommodate the larger caravans that this present-day market desires. This in turn restricts our growth and our turnover, thus it can never be a profitable business because it just cannot employ sufficient staff needed to maintain and run it as we would wish. It was realised by us the Directors that eventually it would be necessary to close it down and therefore we looked for an alternative use.

As you rightly quote in your **2014** Local Plan 'Other Comments' it was discussed with the planners and it was agreed that it should be added to the Local Plan in the medium to long term and it was allocated for housing in the 2012 Draft Local Plan (received very few objections). It was mentioned that there were 'No irresolvable issues. Within the Frinton Conservation Area.



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The **2017** Local Plan showed our land under 'Planning Status' as quote 'This site is allocated for residential development in both the adopted and emerging Local Plan. Site was included in the adopted Local Plan at the request of the owners who were concerned about the long-term sustainability of the existing trailer park, and having been assessed as part of an earlier urban capacity study. Further more the 'Achievable Likely Timescale' was put at 2025-2026. Other Comments noted: Depending on the viability or otherwise of the existing use, residential development is possible within the plan period.

Since that time, we have tried so many different ideas in our endeavour, that just maybe, we could turn this business around and into profitability but unfortunately these have all failed. It was as we anticipated several years ago when we first approached Tendring District Council with our request for a change of use to residential development, as we were concerned about the long-term sustainability of the existing trailer park.

Unfortunately, as Managing Director, I am now forced to retire through ill health at the end of this season 2021, and my remaining Directors now wish to proceed as soon as possible, with the **2014 & 2017** Local Plans agreements. Therefore, we ask that Southcliffe Trailer Company's remaining land area be added once again to the new Local Plan as residential, thus enabling us to proceed to full planning as soon as possible.

Yours faithfully


Jack Nicholls
Managing Director
Southcliffe Trailer Company Limited.

DIRECTORS: J.A.NICHOLLS V.I.NICHOLLS J.A.NICHOLLS
Registration No 467991
Registered Office; Graphic House, 11 Magdalen Street, Colchester CO1 2JT

Assessment of Urban Capacity

LOCAL PLAN 2014

SITE CODE	ADDRESS	Grid Ref	Area (ha)	Estimated Dwelling Capacity	Planning Status (1st April 2014)	Physical Constraints	Environmental Constraints
UC2.1	Former Reservoir Site, Wittonwood Road, Frinton-on-Sea, Essex CO13 9LB.	623222 (E) 220433 (N)	1.04ha	37 (based on the approved planning application, subject to legal agreement).	Planning permission has been granted for 37 units (1/00796/OUT), subject to approval of legal agreement.	Possibly need to maintain operational access to the railway line for Network Rail.	No irresolvable issues.
UC2.2	Site of St. Joseph's Convent, 14-16 Raglan Road, Frinton-on-Sea, Essex CO13 9HH.	624010 (E) 220086 (N)	0.24ha	13 (net) (based on the approved planning application).	Outstanding unimplemented planning permission by appeal (13/01035/FUL) for 14 later living apartments.	No irresolvable issues.	No irresolvable issues.
UC2.3	Land at Frinton Park Court, Central Avenue, Frinton-on-Sea, Essex CO13 9HW.	624390 (E) 220924 (N)	0.20ha	13 (based on the approved planning application).	Outstanding unimplemented planning permission (12/01121/FUL) for 13 apartments.	No irresolvable issues.	No irresolvable issues. Within the Frinton Conservation Area.
UC2.4	Southcliffe Trailer Park, Woodberry Way, Walton-on-the-Naze, Essex CO14 8PE.	625034 (E) 221129 (N)	0.8ha	15 (based on the site being developed at a density of 20 dph).	Allocated for housing in the 2012 Draft Local Plan (received very few objections).	Important to ensure gap from the cliff.	No irresolvable issues. Within the Frinton Conservation Area.

LOCAL PLAN 2014

Infrastructure Constraints	Ownership Issues	Viability Issues	Suitable?	Available?	Achievable? / Likely Timescale	Other Comments
No irrisolvable issues.	No irrisolvable issues.	No irrisolvable issues.	✓	✓	2016-2019.	At the time of writing whilst the Council's Planning Committee resolved to approve the application the Council is still awaiting the finalisation of the legal agreement towards education provision. Timing of development depends on the submission and approval of reserved matters. Good prospects for delivery within the first 5 years of the plan period (2016-2021).
No irrisolvable issues.	No irrisolvable issues.	No irrisolvable issues.	✓	✓	2015-2017.	Timing of development depends on the submission and approval of reserved matters. Good prospects for delivery within the next 3 years.
No irrisolvable issues.	No irrisolvable issues.	Costs of removing existing buildings from the site may affect viability and timing of development.	✓	✓	2015-2017.	Timing of development depends on the discharge of conditions placed on the planning approval. Good prospects for delivery within the next 3 years.
No irrisolvable issues.	Site still operating as a holiday park.	Costs associated with removing existing caravan park may affect viability.	✓	X	2021-2026.	Development likely to be medium to long term as the trailer park is still in operation, despite the owners concerns about longer-term viability given the trend toward owning larger caravans. Delivery within years 6-10 is considered more realistic than years 1-5. High standard of design would be expected due to Conservation Area status.

Assessment of Frinton and Walton Local Plan housing allocations

LOCAL PLAN 2017

SITE CODE	ADDRESS	Grid Ref	Area (ha)	Estimated Dwelling Capacity	Planning Status	Physical Constraints	Environmental Constraints
MSA12	Land at the Farm, Kirby Road	624896 (E) 221821 (N)	2.1 ha	47 dwellings as indicated in the emerging Local Plan which is a gross density of 22 dwellings per hectare.	This site is allocated for residential development in the emerging Local Plan.	Most appropriate point of access is likely to be from adjoining Martello Site. Southern part of site within flood zone.	Historic Farm building within the centre of the site that should be retained and enhanced in any wider development of the site.
MSA11	Station Yard and Former Avon Works, off Station Road, Walton-on-the-Naze, Essex CO14 8DA	625102 (E) 221452 (N)	0.72 ha	40 dwellings as indicated in the emerging Local Plan. The density would be 60 dwellings per hectare – reflecting the site's accessible location next to the railway station and close to the town centre.	This site is allocated in the emerging Local Plan and was recommended as an 'opportunity site' for development in the Walton Regeneration Framework. Part of the site (the Station Car Park) already allocated for residential development in the adopted Local Plan.	Need to maintain operational access to the railway line for Network Rail. Part of the site is also industrial. Possible relocation of Sea Scouts too.	No irresolvable issues. Part of site falls within Walton Conservation Area.
MSA10	Scoutcraft Trailer Park, Woodberry Way, Walton-on-the-Naze, Essex CO14 8PE.	625034 (E) 221129 (N)	0.8 ha	15 dwellings as indicated in emerging Local Plan. This represents a gross density of 19 dwellings per hectare and reflects the site's location close to the cliff.	This site is allocated for residential development in both the adopted and emerging Local Plan. Site was included in the adopted Local Plan at the request of the owners who were concerned about the long-term sustainability of the existing trailer park, and having been assessed as part of an earlier urban capacity study.	Important to ensure gap from the cliff. There is also a trailer park on site which would need to be removed or relocated.	No irresolvable issues. Within the Frinton Conservation Area.
MSA9	Former Town Hall Site, Public Conveniences and depot, Mill Lane	625325 (E) 221791 (N)	0.14	15 dwellings as had been indicated in the Walton Regeneration Framework. Represents a high density of development that reflects the site's sustainable location close to the town centre.	This site is allocated in the emerging Local Plan as well as identified as an opportunity site in the Walton Regeneration Framework	Site lies within Flood Zone. Building works have begun on site.	Southern half of site lies within Walton Conservation Area.

From: JACK NICHOLLS <[REDACTED]>
Sent: 11 August 2021 10:43
To: Planning Policy <planning.policy@tendringdc.gov.uk>
Subject: LOCAL PLAN - SOUTHCLIFFE TRAILER COMPANY LIMITED

Dear Sir Madam,

Thank you for your swift response to my letter dated 9th August 2021 and delivered by hand to the Council Offices at Weeley yesterday 10th August 2021.

I have now registered with the Tendring District Local Plan - Section 2 Main Modifications but have been unable to view the proposed Local Plan. However, I do understand from discussion with my Architect that the status of Southcliffe Trailer Company has been changed from the previous 2014 and 2017 Local Plans. Please send me confirmation of the proposed suggestions for our land that have been put forward with the Local Plan for our area.

My company run the cliff top caravan park locally known as Southcliffe Trailer Park and licensed for only 39 caravans we have traded it since 1982 and over the years tried our utmost to make the business viable. The Tendring District Council will be aware that we have endeavoured throughout our entire ownership of this land to trade as an owners holiday park. We have involved the Tendring District Council in all of our trading decisions throughout our ownership and we believe that we have maximised our trading potential. We have changed the site layout 3 times in our efforts to accommodate the larger caravans that this present-day market desires.

Your 2014 Local Plan quotes in 'Other Comments' It was discussed with the planners and it was agreed that it should be added to the Local Plan in the medium to long term and it was allocated for housing in the 2012 Draft Local Plan (received very few objection) It was also noted that there were 'No irresolvable issues within the Frinton Conservation Area' The 2017 Local Plan showed our land under 'Planning Status' as quote 'This site is allocated for residential development in both the adopted and emerging Local Plan. it was clearly mentioned then that there was concern about the long-term sustainability of the existing trailer park, and having been assessed as part of an earlier urban capacity study. Furthermore the 'Achievable Likely Timescale' was put at 2025-2026. Other Comments noted quote: 'Depending on viability or otherwise of existing use, residential development is possible within the plan period`.

Many different ideas were tried in our endeavour to turn our business into viable profitability but unfortunately these have all failed. It was as we anticipated several years ago when we first approached Tendring District Council with our request for help. We agreed to carry on trading Southcliffe Trailer Park as it is but would implement some different ideas in an attempt to increase the viability of our small caravan site. We purchased additional land alongside to increase our caravan site area, we obtained a new site layout in our efforts to make as much room as was possible. We changed the front row caravans and managed to get permission to site 11 larger caravans, these are very popular but the remaining 28 caravan consist of various sizes and as such are not so desirable in todays market. These alterations were both costly and time consuming work for our small company, but we had anticipated this some 10 years earlier and that is precisely why we approached the Tendring District Council for help. In our opinion we have done our utmost to ensure the future of Southcliffe Trailer Company Limited by our dialogue with the Tendring District Council.

The Directors of Southcliffe Trailer Company Limited feel aggrieved that they were not consulted or invited to comment on the forthcoming Local Plan especially since we remain unsure if there is a proposal to change the status of our previous 2014 and 2017 residential land use. At a Directors Meeting during lockdown it was unanimously agreed that Southcliffe Trailer Company Limited would cease trading as a caravan park and commence consultation with our Architect with the intention of submitting a full planning application. In view of the uncertainty that seems to exits at the moment the Directors of Southcliffe Trailer Company request an assurance that our site will retain its status as residential development of its land in the forthcoming Tendring District Council Local Plan.

Yours faithfully

Jack Nicholls
Managing Director
Southcliffe Trailer Company Limited.

From: JACK NICHOLLS [REDACTED] >
Sent: 12 August 2021 09:08
To: Planning Policy <planning.policy@tendringdc.gov.uk>
Subject: LOCAL PLAN - SOUTHCLIFFE PARK

Dear Sir/ Madam,

Further to my email of yesterday.

We have just spent over 3 hours on our computer just trying to find a copy of the Newly Proposed Local Plan, but unfortunately we have been unable to find it anywhere. We have however noted that our area of land Southcliffe Trailer Park is referred to as just Southcliffe Park but again this proved to be of no assistance to us in locating the information that we seek.

Regretfully we must admit that we are unable to understand the workings of your site and would ask you to assist us please?

To date, we have not been involved at all by the Tendring District Council over our Directors thoughts regarding the future Local Plan for Southcliffe Trailer Park. The previous 2 Local Plans, 2014 and 2017 each clearly laid out the results of the comprehensive discussions between our Directors and Architects with the TDC planners, it was as stated in the 2 Local Plans and as agreed at that time, 'if the long-term sustainability of Southcliffe Trailer Park was unviable then it was agreed that depending on viability or otherwise of existing use, residential development was possible'.

We are a prime residential development site with a proven access off Woodberry Way and in a totally residentially developed area and further more all 4 Directors of the holding company have approved the change from a Leisure Holiday Park that is struggling in todays market to survive, to a suitable residential development as previously agreed with the Tendring District Council planners.

Yours faithfully,

Jack Nicholls
Managing Director
Southcliffe Trailer Company Limited.

From: JACK NICHOLLS <[REDACTED]>
Sent: 13 August 2021 12:48
To: Planning Policy <planning.policy@tendringdc.gov.uk>
Subject: RE: LOCAL PLAN - SOUTHCLIFFE PARK

Dear Ms Eleanor Storey,

Thank you for your Email dated 13 August 2021 regarding the proposed new Local Plan.

We are extremely disappointed to see the proposed modification to our Caravan Park status, especially after all our previous discussions with TDC planners when the 2017 Local Plan was adopted. The comments on the 2017 Local Plan state precisely that an 'Achievable likely time scale was considered to be 2025-2026' This clearly indicated to us there was no immediate urgency to commence residential development and because of this we explored every avenue, as previously outlined, in an attempt to make Southcliffe Owners Park sustainable in the long term, as we wished to continue trading as a Caravan Owners Park. Unfortunately, as previously quoted in my emails, we were not able to achieve this and therefore cannot continue operating this site as a Caravan Owners Site. It is not viable because of our insufficient land size and the inability to site the larger caravans that are now being produced and desired by most Owners.

Discussion between the Directors has been ongoing since the 2017 Local Plan was produced and thereafter when it became clear the site was not viable. We spent much time considering the best way to terminate our business as a Holiday Caravan Park and move forward to achieve a suitable and appropriate residential development. We have concern for our Caravan Park Owners and it is not a simple matter to cease our operations as a Holiday Park. However, by the end of 2019 Covid 19 was becoming a great concern to us which by March 2020 had forced us, and the rest of the Country into lockdown. I am the Managing Director and at 84 was classified as extremely clinically vulnerable making it impossible to do anything business wise until the situation concerning Covid 19 eased up somewhat. As you will be aware the effects of lockdown continued until very recently but during the very final easing of lockdown we had a EGM of all four directors of Southcliffe Trailer Company Limited and agreed that we would proceed immediately to commence the process of acquiring suitable planning permission for appropriate residential development. Throughout this period we understood that we were well within the scheduled timescale for us to commence acquiring plans for residential development, indeed on the 2017 Local Plan Map we are shown as 'A Priority Area for Regeneration' with the time scale 2025-2026

We had no idea whatsoever that there were already proposals to modify the 2017 Local Plan, we were not informed or included in any discussions and it was only by chance, upon talking to the Architect that we were planning to appoint, that we found out about the proposed forthcoming modifications to the 2017 Local Plan. We strongly object and refute your comment, 'Given the very long period of time that Southcliffe has been allocated for housing development, but has remained as an operational trailer park we were not able to justify relying on this site to deliver our housing requirements up to 2033 - hence its proposed de-allocation.' Owing to the fact that we have a timescale on the 2017 Local Plan of 2025-2026 this makes this comment untrue.

With regard to your comment concerning ' recommending protecting existing accommodation to support the tourism industry', we have attempted to support the tourism industry wholeheartedly since 1982 and have invested in all ways possible to keep this business viable. We have already outlined in comprehensive detail our efforts and the reasons why they failed, therefore we consider it most unfair for the Tendring District Council to dismiss our efforts and furthermore to consider that it should remain as an operational Caravan Owners Park.

Kind regards
Yours faithfully,
Jack Nicholls
Managing Director Southcliffe Trailer Company Limited.

From: JACK NICHOLLS [REDACTED]
Sent: 15 August 2021 08:42
To: Planning Policy <planning.policy@tendringdc.gov.uk>
Subject: RE: LOCAL PLAN SOUTHCLIFFE TRAILER PARK

Dear Ms Eleanor Storey,

As I have told you previously we were not consulted at all about the proposed changes to our status on the New Town Plan. We have also had little time to comment or object to this proposal and we feel very aggrieved. Literally our plans were held up because of lockdown, **the Directors had already made the decision that now was the time to activate our full change of use to residential development as was agreed in the previous 2 Local Plans of 2014 & 2017.**

Throughout this weekend I have been going through our previous paperwork over this issue, and to support our strong objection we add the following:

Architectural Building Services (Essex) Ltd

commented on our site for the 2014 - 2017 Local Plans as under:

Subject

Housing provision Supporting the draft local plan.

Reasons for supporting the plan

Policy no ER18 -- Caravan and chalet parks. **Paragraph 3.69** identifies the prime larger sites to provide the bulk of the accommodation as a tourist destination. Southcliffe Trailer Park is not included within these sites.

Paragraph 10.24 identifies Southcliffe Trailer Park as a housing site under Policy HG1. Southcliffe Trailer Park is a small site, which consists of 37 holiday homes. **This site is within a strictly residential area of Walton on Naze and is situated outside the conservation area.** Trading on the site commenced on 30 April 1949 and at the time was licensed for 62 holiday homes. Over the years, due to Site License requirements and larger holiday homes, it is difficult to operate efficiently. Demand continues for larger and more luxurious holiday homes yet the site is only able to accommodate 12 of these, leaving 25 holiday homes on the site which vary from very small units to medium sized units.

Even the manufacturers of holiday homes are now ceasing to build smaller units since there is no demand for them as they prefer to concentrate on the more lucrative larger holiday homes.

The site, on a small area of land is simply not now viable as a caravan park, there are no recreational facilities or amenities. **It is inevitable that with the passing of time a more viable use has to be found for this site.**

As the proposal in the draft plan is to zone the site for housing we wish to fully support this proposal.

We can produce the original document if required. The caravan numbers were different at that time because soon after this we acquired additional land alongside and changed the site layout completely in our effort to accommodate the more larger and luxurious holiday homes that form the 11 caravans that are now our front row. This was, as discussed in previous correspondence between us, in an effort to explore every avenue to make Southcliffe Trailer Park a viable operating Caravan Park. This is now unachievable.

I would also like to add that it was my company Keyplan builders that built Seaview Heights. This has become a landmark development on the cliff top within 100 yards of Southcliffe Trailer Park.

Kind regards,

Jack Nicholls
Managing Director
Southcliffe Trailer Company Limited

From: JACK NICHOLLS <[REDACTED]>
Sent: 27 August 2021 12:52
To: Planning Policy <planning.policy@tendringdc.gov.uk>
Subject: REF: OBJECTION TO SOUTHCLIFFE TRAILER COMPANY LIMITED LAND USE ON NEW LOCAL PLAN

Dear Ms Eleanor Storey,

Once a decision has been reached over my companies comments, raised when objecting to the Proposed New Local Plan and in particular to the proposed change of use for Southcliffe Trailer Company Limited's land area from quote: 'This site is within a strictly residential area of Walton on Naze and is situated outside the conservation area' and supported by the 2017 Local Plan Quote: 'This site is allocated for residential development in both the adopted and emerging Local Plan'.

I understand the the Tendring District Council planning policy was put forward to change Southcliffe Trailer Company Limited's site from an approved residential area and call it an area of land to be used for for the holiday leisure industry. This has never been the use, it is an Holiday Owners Caravan Park and each caravan is used exclusively by one family as a home away from home, our rules clearly state NO COMMERCIAL RENTING. However, regardless of this neither types of caravan sites would be viable to run as a business, due to the lands caravan site capacity which is only 39 caravans and the caravan sizes allowed by the Tendring District Council Rules.

A further point that was recently brought to our attention following a visit by the local fire inspector was his concern that, in the event of a fire in a caravan, their fire engine would be unable to access our site past the car park. This infact leaves 50% of our caravans not reachable without an extendable hose which would cause delays in the case of an emergency. The nearest water hydrant is located in Woodberry Way, and this too would cause potentially life threatening delays should there be an emergency. This again emphasises the fact this site is too small to operate as a viable caravan site.

The time is now that the Directors wish to develop this entire area as we have in the past developed Seaview Heights.

Should a decision be passed against the Directors of Southcliffe Trailer Company Limited 's wishes, and thus prevents the Directors from achieving their planned decision for this land area then we shall appeal that decision immediately.

Kind regards

Yours faithfully,

Jack Nicholls

Managing Director

Southcliffe Trailer Company Limited.