

CHAPTER 2: VISION AND OBJECTIVES

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ID	Rep ID	Name. Organisation	Legally compliant	Duty to Co-operate	Sound	Positively prepared	Justified	Effective	Consistent with national policy	Hearing/ written rep	Supporting docs	Summary of representation [Summaries prepared by Council Officers but the full original representations will be available to the Inspector and for public view]	Proposed change to Local Plan	Council response	Contact details
Representations from Technical Stakeholders															
1104418	LPPuD100	Environment Agency – Andrew Hunter	Y	Y	N	X				H	N	We are largely supportive of the thrust of the Vision. Because of Tendring's coastal aspects which are, to a degree, at the forefront of climate change (rising sea level, eroding shoreline). We would recommend that the Vision includes a reference to adapting and mitigating against climate change through positive measures. Although there is already a reference under Rural Heartland to climate change, we consider the overarching Vision should also address the issue.	The following wording should be added: <i>"Tendring District's coastal area places economic, social and environmental considerations at the forefront of climate change and therefore there will be a need to place adaptation and mitigation against climate change at the centre of sustainable development."</i>	There is no objection to the suggested wording being included at the end of the overarching statement within the vision if it addresses the Environment Agency's concern. A modification is suggested.	Details only available to the local authority and the Inspector's Programme Officer.
1036980	LPPuD120	Historic England – Dr. Natalie Gates	Y	Y	N		X			H	N	In the second paragraph of the Vision, we suggest that "tidy coast" be reviewed to better reflect Tendring's historic natural coastline. Under Seaside towns, we request that there is an aspiration to preserve and enhance the special historic character of Clacton-on-Sea, particularly given the designated Clacton Seafront Conservation Area.	In the Rural Hinterland section, we request that bullet point 3 is amended to "historic" rather than "historical". Under Seaside towns, we request that there is an aspiration to preserve and enhance the special historic character of Clacton-on-Sea, particularly given the designated Clacton Seafront Conservation Area.	It is considered that the promotion of 'tidy' beaches in years to come is particularly important especially in relation to tourism and therefore the word 'tidy' is entirely appropriate. Furthermore, a large section of Tendring's beaches, particularly around Jaywick and Holland-on-Sea are man-made and cannot realistically be considered historic. The sentence in question already highlights the district's attractive historic settlements, landscapes and assets. It is therefore considered that no further reference to the historic environment is required. It would however be appropriate to place a small amount of text indicating the aspiration to preserve and enhance the special historic character of Clacton-on-Sea and to also change "historical" to "historic" under rural hinterland bullet point 3. Modifications are suggested.	Details only available to the local authority and the Inspector's Programme Officer.
1105514	LPPuD51	University of Essex – Nick Davey	Y	Y	N	N	N	N	Y	H	N	The University supports the general strategy as set out in the Vision Statement. Although the University lies outside of Tendring's boundaries, its importance to the District, in terms of both the contribution that it makes to achieving education standards and the contribution that it makes to the local economy, is recognised. The University is pleased that its growth proposals are acknowledged, and supported, but, considers that to be effective, justified and positively prepared, the Council may need to allocate land within its boundaries, onto which the University Campus can expand (during the Local Plan period). The University seeks further discussions with Colchester and Tendring in this respect. The University also generally supports the proposals for the Tendring Colchester Borders Garden Community and also looks forward to working with both authorities to see its realisation.	No specific comments on the vision and objectives, but consideration should be given to allocating some land within the Tendring area onto which the University of Essex can expand.	Comments are noted. The most appropriate vehicle for allocating land in this location however will be through the separate Development Plan Document (DPD) for the Tendring Colchester Borders Garden Community. Following the examination of the Section 1 Local Plan, the Local Plan Inspector concluded (in his post-hearing letter of May 2020) that this development was sound. The University of Essex's involvement in the preparation of that plan will be welcomed.	Details only available to the local authority and the Inspector's Programme Officer.
714889	LPPuD62	Essex Wildlife Trust – Dr. Annie Gordon	Y	Y	Y					W	N	We welcome the inclusion of a statement on protecting and enhancing biodiversity and wildlife networks within the Tendring Vision.	No specific changes to the vision or objectives suggested.	Support is noted.	Details only available to the local authority and the Inspector's Programme Officer.
714889	LPPuD63	Essex Wildlife Trust	Y	Y	Y					W	N	We welcome the inclusion of a commitment to provide a network of interconnected green and blue spaces within the District.	No specific changes to the vision or objectives suggested.	Support is noted.	Details only available to the local authority and the Inspector's Programme Officer.
1022801	LPPuD517	Natural England – Jack Haynes	Y	Y	Y						N	We welcome that the protection and enhancement of the natural environment is a key part of the vision for the district. We also welcome that our previous advice has been integrated and outcome 7 has been amended in line with paragraph 118 of the National Planning Policy Framework (NPPF).	No specific changes to the vision or objectives suggested.	Support is noted.	Details only available to the local authority and the Inspector's Programme Officer.
1022801	LPPuD518	Natural England – Jack Haynes			Y							Following our previous advice, we welcome that objective 8 now includes reference to geodiversity as well as biodiversity, in line with paragraph 117 of the NPPF.	No specific changes to the vision or objectives suggested.	Support is noted.	Details only available to the local authority and the Inspector's Programme Officer.

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Representations from Businesses, Landowners and Developers															
1021196	LPPuD126	Hopkins Homes Ltd – Robert Eburne	Y	Y	N	X	X	X	X	H	N	We are concerned about the classification of Brightlingsea as part of the rural heartland as opposed to a seaside town. Not only is Brightlingsea clearly a seaside town with its long history as a port and its role as a popular tourist and recreation destination, it is comparable in size to the seaside towns of Jaywick Sands, Walton on the Naze and Frinton-on-Sea and it shares many of the same opportunities and threats facing these other seaside towns in the district such as a need for regeneration and investment in the town centre and recreational/tourist facilities. The vision for seaside towns is much more positive than that for the rural heartland and includes a specific vision for each town setting out how the Council will seek to regenerate the area through additional housing development and a focus on improving town centres and recreational/tourist facilities. A positive vision needs to be developed for Brightlingsea and other comparably sized towns in the district, such as Manningtree, Lawford and Mistley, alongside a strategy for how development can be the catalyst for positive change.	We consider there to be a unique opportunity to develop a new Vision for Tendring District that recognises the opportunities and threats facing the district's towns that have not been classified as 'seaside towns' (e.g. Brightlingsea and Manningtree, Lawford and Mistley) and most importantly the opportunity to use well planned residential development to deliver much needed regeneration and investment.	The Council continues to be satisfied that Brightlingsea and Manningtree, Lawford and Mistley are more appropriately covered within the vision under the Rural Heartland section as opposed to the Seaside Towns section. They are not seaside towns with the tourism-related characteristics of Clacton, Frinton and Walton and their economic and demographic profiles are very different. They are more akin to market towns or small port towns with a rural setting and sensitive estuarine environments. There is no benefit from seeking to define these areas separately and it should be noted that both areas are the subject of significant housing growth with Hopkins Homes being the principal developers of the sites of Robinson Road, Brightlingsea (Colne Gardens) and Harwich Road, Mistley (River Reach) – both of which have obtained planning permission and are well under construction.	Details only available to the local authority and the Inspector's Programme Officer.
1007380	LPPuD204	St Osyth Beach Estate (c/o Catherine Pollard – Boyer Planning)	Y	Y	Y					H	N	We fully support objective 10 and its aim to support and work with partners in the tourism sector and its associated services. Our clients privately own Hutleys Caravan Park and over the years the park has expanded in respect of both the scale of the operation and range of facilities. It is therefore welcomed that the Council explicitly supports local tourism businesses and is set to encourage their future growth.	No specific changes to the vision or objectives suggested.	Support is noted.	Details only available to the local authority and the Inspector's Programme Officer.
1007356	LPPuD216	Silverbrook Estates (c.o Tony Collins - Collins & Coward)	Y	Y	N	X	X	X	X	H	N	The strategy for sustainable places is supported but the translation into detailed policy needs amendment to meet the needs of the community to reflect national policy as set out in the National Planning Policy Framework. In particular, Thorpe-le-Soken needs to be connected to Thorpe Station in order to minimise the need to travel by car. The Lifehouse Spa & Hotel site is highly sustainable lying next to Thorpe Station to the south west and is on a bus route along Station Road. Importantly it lies within walking distance of Thorpe High Street.	No specific changes to the vision or objectives suggested. The objection is to the translation into detailed policy, particularly in respect of the Lifehouse Regeneration Project.	The Lifehouse Regeneration Project is not supported by the Council, having been refused planning permission. The proposal for 200 homes on the site in question was also dismissed on appeal. It is considered that the policies within the Local Plan are appropriate to give effect to the vision and objectives without the need for this development.	Details only available to the local authority and the Inspector's Programme Officer.
1106151	LPPuD333	Gladman Homes – Phil Bamford	Y	Y	Y					H	N	Gladman supports the vision which seeks to meet local housing needs through a range of high quality new housing. The Council should not only be seeking to meet local needs, but should do everything it can to exceed the housing requirement given the lack of delivery in the past and the uncertainty over unmet housing needs in London. Gladman support in principle, the Vision to create a new garden suburb to the east of Colchester on the border with Tendring to help meet the needs of both areas, although we have concerns over the site's ability to deliver in the timeframe set out in Part 1 of the Plan. Gladman also support the Council's Vision to deliver modest levels of housing growth in the larger villages to support local services and facilities and meet local housing needs in areas such as Lawford. However, it is considered that the smaller villages such as Ardleigh are also capable of providing modest housing growth, in scale with the existing settlements, to ensure that their current services and facilities are maintained and local housing need is met. This should be reflected in the Vision. Gladman consider that Objective 1 should be amended to state that the main objective is to meet housing needs in full by providing new dwellings with sufficient variety to meet the needs of a growing and ageing population. In allocating sites, the Council should therefore be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products.	Amend the vision to reflect the point that villages such as Ardleigh are also capable of providing modest housing growth, in scale with the existing settlements, to ensure that their current services and facilities are maintained and local housing need is met. Also amend Objective 1 to state that the main objective is to meet housing needs in full by providing new dwellings with sufficient variety to meet the needs of a growing and ageing population.	The general support for the vision and objectives, in principle, is noted. For the smaller rural settlements such as Ardleigh, the current approach to limit residential development to small-scale growth is consistent with their more limited range of shops, jobs, services and facilities and the core principle of the NPPF to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and to focus significant development in locations which are or can be made sustainable. This principle was upheld by a Planning Inspector on appeal who dismissed an application from Gladman Homes on land off Wick Lane. The Council agrees that providing a variety of sites across a range of locations is key to meet housing needs. However, the Local Plan already achieves this – particularly through the wide range of sites of different sizes across the district that have already obtained planning permission and which are expected to contribute the majority of new housing over the plan period to 2033. A small revision to objective 1 could be made to reflect the requirement to meet housing needs in full and to provide variety in terms of location. A modification is therefore suggested.	Details only available to the local authority and the Inspector's Programme Officer.
1007372	LPPuD350	Mr W McMillan (c/o Nick Harper – Hawkspur Ltd)	N	N	N	X	X	X	X		N	The Vision for Tendring District fails to place enough emphasis on the role of the towns and villages not identified as 'seaside towns' in meeting the districts housing need. Villages such as Bradfield need a similarly positive vision to that prepared for the so called "seaside towns" that recognises the opportunities and threats they face and most importantly makes the most of the clear opportunity to use well planned residential development to deliver much needed regeneration and investment in these villages.	Villages such as Bradfield need a positive that recognises the opportunities and threats they face and most importantly makes the most of the clear opportunity to use well planned residential development to deliver much needed regeneration and investment in these villages.	For the smaller rural settlements such as Bradfield, the current approach to limit residential development to small-scale growth is consistent with their more limited range of shops, jobs, services and facilities and the core principle of the NPPF to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and to focus significant development in locations which are or can be made sustainable.	Details only available to the local authority and the Inspector's Programme Officer.

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1106156	LPPuD355	Bourne Leisure Ltd (c/o Sian Davies – Lichfields)	Y	Y	N			X		N	The Vision should recognise the need for development plan policy to be worded to support in principle proposals that would enhance existing tourism accommodation and facilities, and support the provision of new tourism accommodation and facilities. Outcome 11 should also be re-phrased as it currently goes beyond NPPF policy which only requires such commitment where it is feasible or viable. We support objective10 as it has been written but consider that it should also be expanded to reflect the role of holiday parks in Tendring.	Amend the second paragraph of the vision under 'Seaside Towns' to read as follows: <i>"Clacton will have still maintained its tourism roots, building a thriving local tourism industry by having both enhanced its existing offer and provided new tourism accommodation and facilities. As well as attracting holiday makers, the town will ... "</i> Amend outcome 11 to read as follows: <i>"Where appropriate, new developments should account for, adapt to and mitigate against climate change."</i> Amend Objective 10 to read as follows: <i>"To work with partners to provide an enhanced environment for tourism and the maritime sector and its associated services. This should include the enhancement and expansion of existing holiday parks"</i>	The Vision and Objectives as currently written adequately promote tourism functions to a suitable level. The suggested wording adds a level of detail and clarification which is more appropriately addressed within the wording of specific policies. The thrust of the vision of objectives is appropriate. It is not unreasonable for all developments to at least 'account for' climate change and the suggested amendment to outcome 11 to say 'where appropriate' is not agreed. Support for the expansion of existing holiday parks is already provided within policies and the objective to enhance the tourism environment provides sufficient scope for this. Likewise, the general thrust of the vision to build a thriving local tourism industry provides a role for both existing and future businesses. The suggested changes, whilst noted, are not necessary.	Details only available to the local authority and the Inspector's Programme Officer.
1022789	LPPuD366	Britton Properties Ltd (c/o (Martin Robeson – MRPP)	Y	Y	Y				H	N	We support the general principles, structure and content of the Vision. It will be challenging to secure this and it is thus important that the ensuing policies focus on the necessary delivery to achieve this. We are not content that in several respects such policies do have the necessary focus and content to do this. We note in particular the improvements necessary to enhance Clacton-on-Sea to make its economy a success through investment in sectors including retail, leisure, hospitality and health. We also note and support that the smaller towns and larger villages will have secured "modest levels of new housing and employment development" for the latter settlements, the reasoning i.e. "to support local shops and services, address local issues, provide for local needs..." is a worthy and necessary ambition.	No specific changes to the vision or objectives suggested.	Support for these specific elements of the vision and objectives is noted.	Details only available to the local authority and the Inspector's Programme Officer.
1022789	LPPuD367	Britton Properties Ltd (c/o (Martin Robeson – MRPP)	Y	Y	N		X		H	N	Objective 2 focuses solely on using the provision of employment land to secure employment opportunities albeit it recognises that this should <i>"support a diversity of employment opportunities"</i> . Non-traditional i.e. B Class employment is not addressed and the objective should ensure that the nature of these opportunities to be created are widely cast. That would be consistent with the Vision for the District which refers to job opportunities in the retail, leisure, hospitality and health sectors too. Thus, the objective should not limit itself to the development of "Employment Land", such jobs will be created through a variety of mechanisms and the objective should also recognise the need to foster economic success through inward investment.	Amend objective 2 to reflect the fact that the employment delivery is not solely reliant on the development of employment land.	The Council agrees with Britton Properties Ltd that objective 2, as currently worded, does not fully encapsulate the range of economic sectors that will contribute towards employment growth over the plan period. The Council's Economic Strategy recommends that the Council supports growth in existing sectors as well as those sectors with greatest potential to grow in the future, such as renewable energy and care and assisted living. A modification is therefore suggested to address this issue.	Details only available to the local authority and the Inspector's Programme Officer.
1022789	LPPuD473	Britton Properties Ltd (c/o (Martin Robeson – MRPP)	Y	Y	N		X		H	N	Objective Three is severely limited and will not be able to meet the stated Vision. The NPPF explains that the promotion of the vitality and viability of town centres is predicated against the provision of <i>"customer choice and a diverse retail offer"</i> . There is considerable leakage of expenditure, primarily in comparison goods, to Colchester. Clacton town centre is identified as a major town centre in the hierarchy above Harwich and Dovercourt and thus is the focus for retail and related development across the District. In order to achieve the aims set out in the Vision the relevant objective here needs to be more widely cast in terms of how the centre can improve its competitiveness and attraction for its very broad catchment area which extends across much of the District and including its major towns.	Amend objective 3 to reflect how Clacton Town Centre can improve its competitiveness and attraction for its very broad catchment area which extends across much of the district and including its major towns.	The point raised by Britton Properties Ltd is understood, however it would not be appropriate to single out the Major Town Centre within this district-wide objective when there are other Town Centres in the district that require investment and stimulation to maintain their vitality and viability. To do so would potentially dumb down the significance and economic importance of those other centres. It is however accepted that the objective could include some wording to reflect the issue of leakage of trade to other centres, such as (but not explicitly) Colchester. A modification is suggested.	Details only available to the local authority and the Inspector's Programme Officer.
1022789	LPPuD474	Britton Properties Ltd (c/o (Martin Robeson – MRPP)	Y	Y	N		X		H	N	Objective Six is too limited in its intent. Tendring District has a population of 141,000 (2015) and its main settlements are expected to provide a wide range of facilities for many of those residents, be it in terms of employment, shopping, education and otherwise. However, the objective is limited to satisfying "day-to-day" needs in these respects and that is clearly inconsistent with the designated role and function of not only Clacton-on-Sea but also Harwich and Dovercourt. The objective as cast will not be able to achieve the Vision in terms of delivering the "significant resurgence" in retail, leisure and other sectors. As a consequence of change to the objective and other text in the Plan for example at paragraph 3.0.1 will need to be amended and for information the 2011 census population approximately 138,100 and the number of households 62,105.	Amend objective 6 so that it is not restricted to providing the opportunity for people to only satisfy their 'day-to-day' needs.	There is no objection to the deletion of the words 'day to day' which will ensure that the objective does not ignore the requirement for non day-to-day needs, such as for white goods, furniture and general comparison goods to be met. The suggested changes to paragraph 3.0.1 within Chapter 3 is dealt with appropriately elsewhere in relation to Chapter 3 comments.	Details only available to the local authority and the Inspector's Programme Officer.

Representations from Community Representatives

None received.

Representations from Members of the Public

None received.

There are relatively few objections to the vision and objectives for Tendring and the comments that have been made are either generally in support or suggest constructive changes. Where it is considered that such changes are necessary and/or helpful, modifications are suggested below.

Suggested modification: Include additional wording at the end of the overarching vision statement as suggested by the Environment Agency:

...opportunity for a good start in life.

Tendring District's coastal area places economic, social and environmental considerations at the forefront of climate change and therefore there will be a need to place adaptation and mitigation against climate change at the centre of sustainable development.

Seaside Towns

Clacton-on-Sea will have established itself.....

Suggested modification: Include a reference within the second paragraph of the vision statement under 'Seaside Towns' preserve and enhance the special historic character of Clacton-on-Sea in response to the comment made by Historic England:

Clacton will have preserved and enhanced its heritage features and still maintained its tourism roots, building a thriving local tourism industry....

Suggested modification: Exchange the word 'historical' with 'historic' within the outcome 3 at the end of the vision statement, as requested by Historic England:

3. Balancing the development needs of the District with the protection and enhancement of the natural, ~~historical~~ historic and built environment;

Suggested modification: Amend the wording of Objective 1 in response to the points raised by Gladman Homes:

Objective 1

- To provide new dwellings within Tendring District up to 2033 of sufficient variety in terms of location of sites, types, tenure and affordability to meet the needs of a growing and ageing population in full.
- To delivery high quality sustainable new communities.

Suggested modification: Amend the wording of Objective 2 in response to the points raised by Britton Properties Ltd:

Objective 2

- To create the conditions for economic growth and employment opportunities across a range of economic sectors including established business sectors and those sectors projected to grow in the future such as renewable energy and care and assisted living.
- To provide for the development of employment land on a variety of sites to support a diversity or employment opportunities and to achieve a better balance between the location of jobs and housing, which will reduce the need to travel and promote sustainable growth up to the period of 2033.

Suggested modification: Amend the wording of Objective 3 to address the point about leakage of trade to other centres, as raised by Britton Properties Ltd:

Objective 3

- To promote the vitality and viability of the town centres through the promotion of retail and other related uses, exploiting the benefits of enhanced growth of the towns whilst retaining the best and valued aspects of their existing character, as well as responding appropriately to changes in the way people enjoy shopping and other leisure activities, and competition for trade arising from other centres, both within and outside of the district.

Suggested modification: Amend the wording of Objective 6 in response to the concern raised by Britton Properties Ltd about the use of the words 'day-to-day needs' (and to correct a minor typographical error):

Objective 6

- To locate development within Tendring District where it will provide the opportunity for people to satisfy their ~~day-to-day~~ needs for employment, shopping, education, and other services locally or in locations which minimise the need to travel and where there are modes of transport available in addition to use of cars.