

Great Bromley Parish Council

Response to Tendring District Local Plan Issues & Options Consultation

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Introduction

Great Bromley Parish Council is working on a Village Plan in 2015. We have correlated our strategy with the Tendring Local Plan Consultation (“New Local Plan”) where possible. We find many areas of commonality, which we welcome, but we are vigorously opposed to the Tendring Central Garden Village proposal (TDGV) which seems to go against many of the tenets of Tendring District Council (TDC), as well as our own.

There is a strong feeling of disappointment that so much time of our new council is being taken up opposing the Tendring Central Garden Village proposal, rather than our core work, particularly as the same site has come up and been quashed several times before.

Our responses below will therefore be almost entirely focussed on explaining why TDGV is totally unacceptable to our Council and the vast majority of our residents (and those of neighbouring parishes).

Issue 1:Jobs

1) Do you agree that creating the conditions for economic growth and creating new jobs should be a top priority for the Local Plan?

Yes, but not at the expense of other factors – chiefly the quality of life for current residents. Focus should be on creating jobs and growth in the areas that need support, as you have identified, being generally the coastal towns of the region (Harwich, Clacton etc).

2) Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?

Creating conditions for economic growth is vital, but as you state in the proposal, creating these conditions around existing towns is best for future economic growth and government grants.

TDC should be utilising current brownfield sites and encouraging new businesses to existing business parks, many of which are dilapidated or poorly used. The Horsley Cross industrial development has had no uptake as it is in the wrong location, and that is just up the road from TCGV. There is no need for an array of industrial units in this location.

3) Do you have any other comments or suggestions about growing the economy and creating jobs?

Small business run from home is a growing trend in villages but this will be reliant on the environment remaining a pleasant place to live, not becoming a long-term building site whilst it is turned into a small “new town” with clogged access.

4) Have we missed any issues that ought to be covered?

Rural tourism (not just seaside) and agriculture contribute to the local economy and should not be forgotten; in fact they should be actively encouraged.

Development in rural parts of the region will tend to pull away focus from the areas that need regeneration. Significant new developments in rural areas would be best left unchanged from current policy.

Development on Grade 1 & 2 agricultural land would be a very short sighted policy, given the decreasing proportion of home-produced food consumed in the UK.

Issue 2:Homes

5) Do you agree that we need to plan for the right number of new homes, of the right size, type and tenure to be built and in the right locations for current and future generations?

Tendring does indeed need to plan for the right number of new houses, but the figures in your proposal are possibly inaccurate (refer Local Plan newsletter Number 5, 5/10/2015) and need revising downwards.

Finding those right locations will always be a challenge. Correctly assessing the numbers required will only ever be guesswork. We agree that it is TDC's urgent duty to properly plan for new homes in the coming years and to put an end, as soon as possible, to the free-for-all applications we are currently suffering.

The "right type" is key to us. Our "Bromley Cross" area has been totally transformed, and not for the better, with recent planning decisions. Huge, overbearing houses have changed the character of the road, and the granting of outline planning for the Cross Inn curtilage has allowed it to close and hence a valuable amenity has been lost to the community.

In rural areas there is dire need for a mix of housing, including affordable. There are plans already underway for the provision of affordable homes in our village, with an RCCE survey currently being compiled to assess need. This would result in an appropriate number for our community's size and requirements, and would be for local people, to the benefit of our community.

6) Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?

Your assessment seems to be good common sense in general. However, section 4.13 seems incongruous. The siting of homes should not be about the financials to suit land owners or TDC. The houses need to be built where they are needed – the areas targeted for growth – not simply for yet more commuters.

The prevalence of dormitory village mentality is already eating away at the rural way of life in the region resulting in a very noticeable reduction of participation in local events and activities. It was the community spirit that made our villages and towns "a nice place to work and live" in the past, and further erosion of the community spirit by inappropriate development is not welcome.

7) Do you have any other comments or suggestions about housing development in Tendring?

Affordable housing in the 'richer' areas, Manningtree-Mistley and rural villages, should be more of a priority. There are plans in our village already underway for the provision of affordable homes for local people. As stated above, the focus should be on affordable housing for the benefit of Tendring as a whole, not for the benefit of developers or for generating rates revenue.

8) Have we missed any issues that ought to be covered?

Whilst it is accepted that new houses are required, it is stated that the majority will be required around Clacton and other seaside towns, so it is incongruous to include a proposal to place a quarter of the total in a rural setting.

The developer may well promise lots of services to mitigate a large development. However, the costs of infrastructure and bringing in services required (i.e. widening lanes and new road links, schooling, doctor etc.) will make that an expensive development, resulting in mainly mid- to high- end housing, not the lower cost housing the area might need.

Issue 3: Infrastructure Questions

9) Do you agree that the Local Plan will be critical for making sure we have the right infrastructure in Tending to accommodate the new jobs and homes we will need in the future?

We know people in the district who are already dissatisfied with the existing infrastructure, whether it be the responsibility of TDC, ECC or Highways. There is little confidence that any new mass housing will have suitable infrastructure in place. With the uncertainty over the number of houses needed, we see a great danger in a site being identified for a large-scale development, then the site only being slowly developed over a long drawn out period, making the area an eyesore but, worse than that, with the promised infrastructure never actually materialising.

10) Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?

Only develop in areas with suitable infrastructure. Concentrate more to provide upgrades where there has been a lack of investment. Do not just consider action because there may be some new housing planned, but instead consider the infrastructure shortcomings for the benefit of the existing population.

11) Do you have any other comments or suggestions about infrastructure in Tending?

Currently, the infrastructure is not in place to service such a huge development as TCGV. The local schools would not be able to cope, and neither would the surgeries. You mention (Section 5.3) super-surgeries with large groups of GPs. However, there are huge problems with GP recruiting already, so these would be difficult or impossible to staff. In addition, by their very definition, they would be situated some distance from most people - the lack of public transport would mean that patients would need to drive or somehow find transport.

There is no railway station, bus services are poor, and there are already concerns about large traffic volume on the A133 especially on Clingoe Hill and into the Hythe where there are already severe traffic delays, and not only in rush hour.

There are no shops or leisure facilities in the vicinity of TCGV - again a motor journey required. It is possible a new mini-town like this would provide and support a shop, but not in the first few years of development.

12) Have we missed any issues that ought to be covered?

The proposed area to be developed covers a rain water catchment area. Many people in surrounding villages depend on well water for their clean water supply. This is at risk of contamination with a proposed industrial site and large scale building works.

The area proposed has an extremely high water table, there is flooding with regularity. It is not therefore suitable for building. Green areas help to mitigate the effects of climate change and help to reduce the risks of flooding. The suggestion of building houses on an area already prone to flooding is counterintuitive.

This issue of the water table & catchment area has been brought up in great detail in previous objections to this site. Our view is that this matter alone should have been reason enough for the TCGV site to be excluded from your consultation document.

There is also the issue of holiday seaside traffic, which causes regular gridlock in the summer. We will mention this again in a later section.

Issue 4: Environment Questions:

13) Do you agree that protecting and enhancing the environment is an important issue for this Local Plan?

Yes, more important than TDC seems to indicate. The ancient lanes and hedges are an important part of the Southern part of our village, which is somewhat remote from the Northern part thanks to the “new” A120. The main country walks that still remain for the Hare Green and Balls Green inhabitants are within the TCGV site! There is much enjoyment derived by local people from the derelict old orchard between Harwich Road and Brundells Lane/Chapel Lane, which is teeming with wildlife. Whilst this is good agricultural land wasted, perhaps, at least it is not lost forever to housing.

14) Do you have any thoughts about how the Council, through the Local Plan, should go about addressing this issue?

The character of the ancient rural communities of Ravens Green, Frating, Hare Green and Balls Green must be preserved. It is important to preserve the open spaces between different villages. If the spaces are permitted to be developed then the settlements will simply merge together into a small “town”, but without any of the benefits of a properly planned town.

The urbanisation of these hamlets will cause loss of general amenity for existing residents who will no longer be living in the rural community they were raised in, or that they chose to move to, but find themselves living in a conurbation.

15) Do you have any other comments or suggestions about protecting and enhancing the environment in Tendring?

TDC should make more effort to preserve and even generate woodland and natural areas rather than allowing building on them. Encouraging walking, cycling and other outdoor activity that benefits everyone.

16) Have we missed any issues that ought to be covered?

A key asset of Tendring is its tourism. This requires sensitive building of developments that blend in with the countryside. Building 2,500 houses in a field does not fulfil those requirements. The land proposed is Grade 1 and 2 agricultural land, this land should be used for agricultural uses, growing crops for our increasing population, not building houses.

The document mentions the low rainfall in our district. The proposed site partially covers a rainwater catchment area. This water is vital for domestic use, especially by those local residents who still depend on well water for their supply.

Flood risk is mentioned; building houses on an area with a high water table will only increase the flooding risk, not only to the houses themselves, but also to the surrounding settlements. Agricultural land that floods naturally reabsorbs water, paved driveways do not.

Issue 5: Vision Questions:

17) Do you agree with the vision for the future of Tendring set out above?

We broadly agree; it sounds good. We do not consider the proposal of TCGV to match this vision in any respect! In particular your rural heartland statement is totally at odds with a large development such as TCGV. We would welcome any help with encouraging progress for broadband in Great Bromley that is suggested.

18) If not, do you have any alternative thoughts or ideas about the vision for the future and what we should be aiming to achieve?

We would like to see a stronger message in support of the rural heartland of Tendring, ensuring that any new developments are sympathetic to their location and in proportion to the character and size of existing settlements, and also to protect our agriculture and green fields. In essence, to keep them rural.

Issue 6: Options for growth

19) Which of the options 1, 2, 3 and 4 do you think is best of Tendring and why?

As hinted at in the Consultation Document, Option 3 “Tendring Central Garden Village” is simply a developers’ opportunistic revamp of a proposal that was marginally supported by Tendring DC back in 2004, but which was comprehensively rejected following a public enquiry. The main reason for its rejection was the unsustainability of the location. Little has changed since then. Whilst the proposed volume of new housing (2,800) would have a massive impact on the surrounding villages that would, in effect, be amalgamated into a small town but without a town’s facilities, the size of the development is unlikely to be large enough to allow any developer or the authorities to pay for the infrastructure such as a multi-way road link with A120 and A133, fund a school, nor attract a GP even if a surgery was built. The development is too small to be properly serviced, but far too large for the neighbouring communities and infrastructure to absorb.

The seaside traffic in the summer often causes long tailbacks through Great Bromley on the A120, with stationery queues sometimes stretching over a mile back along the A120 towards Colchester from the A133 slip road. This problem, which is currently a nuisance to locals in the area and to traffic travelling towards Harwich, already dissuades some potential tourist visitors to our seaside towns and coastal areas. To place additional roundabouts on this key route to service a large conurbation will only cause further delays in this area, dissuading even more visitors, and encouraging more traffic onto small local roads to avoid the jams.

Conversely, a new settlement placed near Weeley might lead to dualling of the A133 between Frating and Weeley which might greatly assist the traffic flow.

One of the suggested advantages of TCGV is the employment opportunities and jobs created in the commercial part of the development. As noted elsewhere, Horsley Cross was granted planning permission for industrial use but has not been actually built due to uncertain demand. A new business park in our village goes against many of your own suggested and existing policies. There is no sense in making a new brown-field site here, adjacent to a major water catchment area and on Grade 1 & 2 agricultural land.

We would expect the commercial part of the developers’ plan to be dropped, and most likely turn into more houses, if the application was to be incorporated into the Local Plan.

Even if the commercial development went ahead, alongside the housing, we would expect the majority of the residents of TCGV to be commuters. There is no rail link in Great Bromley. Even with new road links to the A120, we would expect many commuters to add to the traffic chaos on the Eastern approaches into Colchester.

However a high proportion of the commuters are likely to make for the train station at Manningtree, via Little Bromley. Parking for commuters at Manningtree station is already at capacity and the area is very heavily congested around rush hour. Some train commuters may choose Great Bentley station or others on the Clacton branch line, although that seems less likely due to the connections and infrequency of trains, which would add further traffic around Great and Little Bentley.

The public bus service is sparse and inadequate and not likely to be improved to alleviate the situation. The likelihood is that people moving to a location such as TCGV would rely on two or more cars.

If the residents are expected to work in the areas that have been identified for regeneration and growth, namely Harwich and Clacton, then it is not appropriate for them to be living in the West/Central part of the district, generating yet more traffic. It would make far better sense to opt for Options 1 (Clacton) or 2 (Weeley) and 4 (taking in Dovercourt/Harwich) – all with rail links.

Any development of this scale will have a hugely detrimental effect on Frating and Great Bromley, as well as neighbouring Ravens Green in Little Bentley. The development will destroy ancient lanes and hedges, and merge the villages into a sprawling, unplanned conurbation. Great Bromley is already challenged by its

geography, being long North to South, and divided in two by the A120. If the Southern end becomes merged into a semi-urban sprawl with Frating and Ravens Green, the village identity will be lost for ever.

The Great Bromley primary school is successful, highly regarded, and already very well subscribed. It could not cope with an influx of children from 800 to 2,500 homes. If a new school (Section 8.25) is to be built in TCGV, what happens to the current school? Likewise, if a community facility or centre (Section 8.25) is built, what happens to our much loved Village Hall?

We are very sceptical about the delivery of most of these advantages in terms of infrastructure.

We question your advantage point 8.25(4) regarding low flood risk on account of the high water table. Whilst we do not expect to be flooded from sea or waterways, prolonged heavy rain (as occurred in January & February 2014) could cause big issues if this land was to be developed.

We concur with your points of disadvantage, and many more besides.

20) Do you agree with the general assumptions about where most housing development will go?

Colchester with its creaking infrastructure is growing at a frightening rate, and the Salary Brook development will only make things worse. Regeneration and growth in the coastal areas should be the main priority.

We accept that the smaller rural communities must play a role in handling the growth. See below.

21) Are there any alternative options the Council should be considering?

A large development on green-field land is not likely to be popular, sustainable or be good for the district in almost any location. We hesitate to suggest a neighbouring community being lumbered with a similar burden; although if such a site has to be chosen, options 1 & 2, Clacton and Weeley seem more favourable in terms of current infrastructure, not such a severe loss of character and lower quality agricultural land being lost to development. They would also be more inclined to bring workers to where they may be needed for successful regeneration projects around Clacton.

We feel a better option is spreading the load. We agree with implementing Option 4, which is some higher density housing being provided in the Eastern towns, to a limited extent to maintain quality of life in these towns.

We would also suggest a new Option 5, which is a mix of affordable and market housing in every rural community, (say on average 5 or 6 per year). That could equate to 75 extra houses per village over the life of the plan. Every village can cope with some small increase, with proper input from their Parish Council; small, sympathetic developments with the possibility of redrawing village settlement boundaries in some deserving cases. These developments are likely to happen naturally anyway, so why not allow for it in the plan? This would permit TDC planners to accept sensible proposals, if the housing need does indeed exist at the time of application, or reject then at times there is no perceived immediate need, particularly if the locals are not in favour of that development. We realise this might be less attractive for developers, a bigger development being far more profitable, but we should not be looking out for their concerns, but rather those of our communities.

Issue 7: Planning Policies

22) Are these the right planning policies to help the Council deliver sustainable development?

Most of these points about sustainability make good sense. However, TCGV does not tick many boxes. That development certainly goes strongly against 9.5 (sprawl) and 9.6 (protect green spaces and not merging villages), 9.8 (impact on environment and amenity).

23) Are there any other policies the Council should consider?

Not that we can see.

24) Are these the right planning policies to help the Council plan for prosperity?

These policies are sound. Section 9.19 we agree with, and certain such uses already bring benefit to our village but is very important to closely monitor any change of agricultural use to industrial to stay essentially rural.

25) Are there any other policies the Council should consider?

Not that we can see.

26) Are these the right planning policies to help the Council plan for people?

Again, the sentiments seem sound. Yet again, TCGV does not tick the boxes and should not be considered.

27) Are there any other policies the Council should consider?

No.

28) Are these the right planning policies to help the Council plan for places?

Yes. In 9.34 we would like to see more restrictions placed on removal of old hedges and the like, TDC planners should be careful to flag these up at the approval stage before it is too late.

29) Are there any other policies the Council should consider?

None noted.

CONCLUSION

The strength of feeling in the parishes situated around the proposed Tendring Central Garden Village site has been demonstrated by the high attendance and level of interest at the exhibition held in Great Bromley Village Hall. We assume and hope this feeling will be turned into corresponding submissions from the public. In 2004 a large petition was organised against the "Oasis" development (an apt name considering the amount of water under the site) and very many locals have been asking if they could sign one; we judged submissions to be of more value to assist planners in making the right call.

It is debatable whether a larger development is actually needed in Tendring in the current planning cycle. Even if it is needed, TCGV is certainly not a sustainable option as evidenced by the many factors outlined above. Nor is it desirable, other than to housing developers. Great Bromley Parish Council therefore suggest this development site as proposed in Option 3 should be dropped from consideration.

The new Local Plan should focus more on affordable housing in the rural areas. Developments outside the major centres should be confined to small, sustainable and appropriate developments, sharing the load around the district, and hence maintaining the rural character of the heartland.

We would like our Option 5 to be considered to manage the additional growth that may be needed in the life of the plan: a mix of affordable and market housing in small, sympathetic developments in every rural community.