

## **Little Bromley Parish Council**

Response to

### **Tendring District**

#### **Local Plan Review: Issues and Options Consultation Document**

Little Bromley Parish Council strongly object to many of the policies and ideas proposed in this *Local Plan Review: Issues and Options Consultation Document* (the Document). We object to those ideas that will lead to unsustainable new housing allocations and / or large-scale new developments, specifically in Little Bromley, and also at Horsley Cross.

We understand that the new Government has decreed that all councils in England are to have new, mandatory housing targets in an attempt to deliver 1.5 million more homes – and that therefore housebuilding numbers in Tendring would need to reach levels far beyond anything previously achieved.

But whilst we recognise that the Government's decision on housing numbers appears to be somewhat arbitrary and entirely contrary to any idea of local government devolution, we nevertheless do not believe that TDC should be panicked into throwing out best planning practice in an attempt to comply with the Government's diktats.

Planning Policy in this country is well-established and is still based on a presumption in favour of sustainable development, where sustainability is defined by three overarching objectives; economic, social and environmental which are interdependent and need to be pursued in mutually supportive ways. We are concerned that the Document, as written, could risk undermining those concepts of sustainability and hence could lead to housing growth in inappropriate locations thereby creating dysfunctional communities devoid of social cohesion, increasing waste and pollution, and/or weakening the already fragile economy.

#### **2.18 Settlement Development Boundaries**

We support the principle of settlement development boundaries, but we object entirely to the wording of this policy that states they “*will be adjusted as necessary.*” This suggests that village development boundaries could be modified on an *ad hoc* basis to meet the requirements of incoming planning applications; effectively allowing a free-for-all. If a development boundary can simply be changed “as necessary” then what is the point of having it?

Settlement development boundaries are and have for generations been the cornerstone of planning and development control, particularly in the rural communities of the district, they should not be tampered with lightly.

We would also note that many of the existing village development boundaries contain large amounts of allocated but undeveloped housing land and yet this fact appears to have been overlooked in the Document. TDC has at its disposal a great many methods by which it could encourage or facilitate the development of land that has been appropriately identified as suitable, including ultimately the power of compulsory purchase. Given the pressure put on this district by the Government's new housing targets it seems obvious to first ensure that all current allocations are being appropriately used.

## **2.25 Limiting Additional Housing Growth Around Clacton and the Garden Community**

We object to the very concept of this paragraph. Given that so much of the Document is based around the new Government's demands to massively increase housing numbers, it seems incredible to have a heading that talks about limiting housing growth in the two places that have more growth capacity than the rest of the district combined.

The proposals for the Garden Community have been artificially restricted by caving in to a small group of objectors from outside the district and not allowing development south of the A133, even though this would be extremely attractive to both house builders as well as to the University.

Clacton is the largest urban centre in Tendring, by a very large margin, and therefore it is the natural place for serious, meaningful and sustainable growth in housing numbers which, if planned for properly would enable the improvements to infrastructure, such as the dualling or upgrade of the A133, that are so desperately needed to see the town prosper.

### **Rural Settlements**

Speaking to the Document more generally, it not clear whether existing rural settlements are being described on the basis of the respective town and parish council boundaries, or whether there is a more general consideration of all villages, hamlets, heaths, greens and other settlements in their own right, regardless of local government boundaries. Either system could work, but it would be helpful if it were clear which one is being used.

As an example, there is a proposal to include both Ardleigh and Little Bromley in Tier 4 Smaller Rural Settlements. They are both separate parishes in their own right, but other than that there are very few similarities between them, especially in terms relevant to the Document. Ardleigh is a very large and well-serviced village with shops, a school, doctors' surgery, village hall, active church, play areas, public open spaces and which includes several separate and distinct population centres over a frankly huge geographic area, including the historic centre of the village itself, much of which is a conservation area, and also at Foxash Estate, Ardleigh Heath, Crockleford Heath, Burnt Heath, Fox Street as well as the urban conurbation in what is in effect North Colchester, and which includes Plains Farm Close, Ipswich Road and the new housing estate on the former Betts factory site. Ardleigh has a population of c.3,000 and hundreds of businesses such that more people work in Ardleigh than live there.

By contrast, Little Bromley has a population of just over 200 and only has meaningful development in the centre of the village, and even then, the housing alternates from one side of the road to the other. The settlement development boundary for Little Bromley even includes houses and land in the neighbouring parish of Lawford, such is the tiny size of the village.

The proposal to hugely increase the settlement development boundary in Little Bromley is irrational and contrary to any notions of sustainability. Little Bromley is not a sustainable location for development by any definition of the word, and previous local plans have always recognised that. The fact that there is now a sudden and even greater need for large-scale housing allocations in no way changes the sustainability, or lack thereof, of Little Bromley as a potential site.

There are no amenities of any kind in Little Bromley. There is no public building or village hall. There is no park or public open space or children's play area. There is no doctors' surgery or health facility. The village church was declared redundant many decades ago. The phone box

was disconnected many years ago and even the mobile library van no longer visits. The village shop and Post Office closed in 1998. There are no food shops or convenience stores.

There is no mains gas supply; homes are typically heated by oil. There is no mains sewerage. Much of the village, including the pub, which is now only open part-time, is not connected to mains drinking water.

There are no pavements (except for a small stretch immediately in front of the Council Houses). There are no streetlights. Children attending the nearest local secondary school are entitled to free bus travel because the route is deemed “unsafe” to walk due to the lack of footpaths or pavements, but those children getting to or from the bus stop in the village have to walk in the road.

Employment opportunities are effectively non-existent in the village; living in Little Bromley and having a job means reliance on a car.

Little Bromley is extensively detailed in the Domesday Book (written in 1086), when it was recorded as being in the largest 40% of settlements in the kingdom. Today it is one of the very smallest and in no way can it be considered to be a sustainable location for development.

If development is to be allowed in Little Bromley we are strongly of the view that it should only take the form of a few individual new properties pepper-potted around the parish. Any infilling of the gaps on Shop Road should be strongly resisted as this would alter the distinctive character and appearance of the village, which is well-known for having houses only on one side of the road at a time. If larger development has to happen within the parish then it would actually make more sense for it to be in the vicinity of Dead Lane, where the parish immediately abuts the new “Manningtree Park” housing development.

### **Horsley Cross**

Any proposals to allow residential development at Horsley Cross are entirely without merit from any kind of planning perspective, indeed it is quite difficult to think of a less appropriate place in Tendring to allow large scale housing to be developed than Horsley Cross, which is isolated, remote and has no previous history of residential living on any meaningful scale. The large-scale industrial units that have been built there in recent years are struggling to find any tenants or buyers precisely due to their remote location, and if they do succeed commercially they would hardly be compatible with residential neighbours.

### **Omissions**

It is also of great concern to Little Bromley Parish Council that several significant matters, of material consideration to development in the district, appear to have been ignored or overlooked or are simply missing from the Document and should be included.

#### **1. Electricity sub-stations, pylons and cabling**

The most glaringly obvious of these would be that probably the largest development ever proposed within the district of Tendring has not even been mentioned, despite the undeniably enormous impact it will have right across the district, but most catastrophically in and around Little Bromley. The so-called “Great Grid Upgrade”, being proposed by National Grid, and the inextricably linked proposals of their partners North Falls and Five Estuaries as well as Tarchon, would see industrialised development covering hundreds of acres of open countryside and grade 1 agricultural land. The impact this would have on existing communities, if it goes ahead,

is difficult to comprehend, and from a risk management perspective alone there should be some sort of contingency planning as clearly if all the proposals do proceed then it will be even harder to find appropriate land suitable for housing.

## **2. Protecting and Supporting Existing Communities**

Returning to the issue of sustainable development, especially in the rural areas, we feel that there should be a fundamental principle that existing communities should not suffer or be detrimentally harmed by new developments, indeed they should wherever possible benefit from and be improved by new developments. As a very small example of “new build harm”, residents in Little Bromley now get their post delivered several hours later in the day than they used to because our postman delivers to the new development in Lawford before coming to our village. With hindsight, a unilateral undertaking of some kind could have been drawn up before planning consent was given to avoid that situation ever arising. We feel it would greatly ameliorate the general public’s natural fears and concerns about proposed large new developments if it was clear that TDC had an obligation to do everything possible to avoid existing residents feeling downgraded or suffering as a result of any new housing.

To go further on this point, it is not an unreasonable or unrealistic ambition that a new development should actually improve and/or benefit a nearby existing community, for example by ensuring that the superfast broadband to the new homes is also connected to the existing ones. Or mains drinking water, or sewerage, or many other basic amenities. Mini roundabouts or junction changes so the new development can access the road network do not meaningfully count as beneficial to anyone!

## **3. Mains Sewerage**

Also given the lived experience of our residents in Little Bromley dealing with the daily reality of cess pits, septic tanks and sewage treatment plants, we also feel that the Document should include a clear policy that any new housing should be connected to mains sewerage, without exception. Off-mains sewerage is one item that is contrary to all three of the sustainability criteria that should apply to any new development:

Economically, it costs tens of thousands of pounds to install a modern sewage treatment works for a single dwelling, and they can have a lifespan of only 10 – 15 years. The annual cost of running it (electricity, servicing, cleaning, emptying and general maintenance) is many times the cost of mains sewerage.

Socially, without going into too much graphic detail, living with off-mains sewerage is not for everyone! It means complying with regulations, organising routine maintenance and emptying, not using bleach or many other toilet cleaning products and not flushing anything other than paper. And explaining all this to every guest who visits.

Environmentally, the effluent from every off-mains sewage system ends up going into a ditch or soaking into the ground, with an inevitable environmental impact to some degree. The most modern sewage treatment plants that create the cleanest effluent require powerful electric motors or air pumps running non-stop, 24/7.

In conclusion, Little Bromley Parish Council believe that the Document proposals are unsuitable for Little Bromley and Horsley Cross. It is clear that Little Bromley should be distinguished from other villages in Tier 4 due to its lack of amenities. The building of 30 homes in Little Bromley would increase the parish size by a third and we fail to see any associated

benefit the proposed development at Little Bromley or neighbouring Horsley Cross would bring. The character of Little Bromley would be irreparably harmed should building of the proposed scale occur within the village. Any development should be sympathetic to existing building patterns with only singular builds or “peppering” of small-scale developments across the parish being permitted.

**Little Bromley Parish Council**

**Monday, 14 April 2025**