

FORMAL REPRESENTATION TO THE PLANNING INSPECTOR

Little Bromley Parish Council Regulation 20 Representation – Tendring District Local Plan Review 2025–2042 Site: MSA20 – Land south of Shop Road, Little Bromley Issue: Soundness, Legal Compliance, Deliverability and Cumulative Impacts

1. Introduction

Little Bromley Parish Council submits this representation objecting to the Tendring District Local Plan Review 2025–2042 as a whole, and in particular to the inclusion of allocation MSA20 – Land south of Shop Road, Little Bromley.

Tendring District Council already has an adopted Local Plan running until 2033. The proposed replacement is premature and driven by unrealistic housing numbers mandated by central government. The recently-abandoned Local Government Reforms had earmarked a date for the abolition of Tendring District Council (TDC), and it is clear that the process of creating this replacement Local Plan has been driven by a desire to complete the task before the authority ceased to exist, rather than to create a sustainable and credible Plan that is fit for purpose.

As a result, the proposed large new towns are unachievable in any reasonable timeframe and represent the opposite of sequential or sustainable development.

With regard to allocation MSA20 – Land south of Shop Road, Little Bromley, we contend that the allocation is:

- **Not legally compliant**, due to failures in meaningful engagement with the Parish Council
- **Not sound**, failing the NPPF tests of positively prepared, justified, effective, and consistent with national policy
- **Not deliverable**, due to critical wastewater and infrastructure constraints
- **Contrary to the updated NPPF (2026)**, particularly in relation to wastewater infrastructure, environmental sustainability, and deliverability
- **In conflict with the emerging Little Bromley Neighbourhood Plan**, which has not been considered by the Local Planning Authority
- **Incompatible with the cumulative impacts of multiple strategic energy infrastructure projects affecting the parish**

We respectfully request that the Inspector delete allocation MSA20 from the Local Plan.

1.1 Cumulative Impacts of Electricity Substations and Strategic Energy Infrastructure

Little Bromley is already subject to substantial and prolonged development pressure from multiple nationally significant energy infrastructure projects. As the Tendring District Association of Local Councils notes, **“the rural communities of Ardleigh, Little Bromley and neighbouring parishes already face substantial and prolonged development pressure from nationally significant energy infrastructure.”**

This includes:

- The **Norwich–Tilbury 400 kV reinforcement**, proposing a major new **East Anglia Connection Node (EACN) substation** in Tendring
- Extensive **underground cable corridors**, construction compounds and haul roads
- The consented **North Falls** and **Five Estuaries** offshore wind farms and their onshore export cables, substations and converter stations
- The emerging **Tarchon Interconnector**, proposing approximately **15 km of underground HVDC cabling** and a converter station within the district

TDALC correctly states that **“the issue is not whether one scheme alone can be mitigated, but whether the spatial strategy as a whole is justified, deliverable and resilient when overlapping construction corridors, land-take, traffic movements, landscape effects and demands on services are assessed together.”**

Little Bromley lies within the zone of influence of multiple cable routes, potential substation locations, trench corridors up to 60 metres wide, and construction traffic displacement affecting rural lanes. These pressures coincide with the proposed housing allocation MSA20, despite the village having:

- No mains sewerage
- No public transport
- Limited potable water supply
- An already fragile rural road network

The Local Plan Review does not assess the cumulative effects of these strategic energy projects together with proposed housing allocations. Without a district-wide cumulative-impact assessment covering committed, consented and reasonably foreseeable energy infrastructure, the Plan cannot be considered justified or effective. The spatial strategy places a disproportionate burden on Little Bromley and neighbouring parishes, contrary to the NPPF requirement for sustainable development, fair distribution of growth and robust evidence.

2. Legal Compliance – Failure of Meaningful Engagement

2.1 Late Notification of Key Committee Meeting

TDC notified the Parish Council of the Planning Policy & Local Plan Committee meeting on Monday 8 June 2026, at which officers recommended deletion of MSA20 but the Committee reinstated it.

However:

- The notification email was sent late on Friday, immediately before a weekend
- The Parish Clerk did not see the email until Monday morning
- By the time councillors became aware of the meeting, it was too late to attend or register to speak
- TDC has apologised for the lateness of the notification

This prevented the Parish Council — a statutory consultee — from participating at the decisive moment when MSA20 was reinstated.

The Inspector is required to consider whether consultation was **meaningful**, not merely whether an email was technically sent. In this case, meaningful engagement did not occur.

2.2 Lack of Clear Information Provided to the Parish Council

Our ward councillor attended Parish Council meetings and provided general updates on the Local Plan's progress, timetable, and procedural stages.

We have since learned that she declared an interest at district level and did not take part in any discussion or decision-making about the Local Plan because her husband and his brother own the land allocation site. We raise no concern about her conduct in that regard.

However:

- No mention was ever made that land in Little Bromley was being promoted for allocation
- The Parish Council was therefore unaware that a significant housing site (MSA20) was proposed in the village
- As a result, the Parish Council did not engage early in the process because it believed — incorrectly — that the Local Plan did not materially affect Little Bromley

Little Bromley — the smallest village in the district — was not aware of a major proposed development until very late in the process. This undermines the effectiveness of consultation and raises a legitimate issue of legal compliance under the duty to engage communities meaningfully.

3. Soundness – Failure of Evidence, Justification and Deliverability

3.1 Officers Recommended Deletion of MSA20

Officers recommended deletion of MSA20 due to:

- Sewerage capacity limitations
- Infrastructure constraints
- Unsustainable location
- Remoteness from services and employment
- Impact on rural character

Anglian Water advised:

“Little Bentley, Little Bromley and Tendring Heath are best treated as open countryside to which no additional development should be directed.”

This is clear, authoritative evidence.

3.2 Committee Reinstated MSA20 Without Any New Evidence

Despite the above, the Committee reinstated MSA20 (reducing the number from 17 to 10 dwellings).

However:

- No wastewater feasibility study was presented
- No highways or sustainability evidence was provided
- No deliverability assessment was offered
- No new evidence was introduced to contradict officers' concerns

The reinstatement relied on assertion, not evidence. This fails the NPPF test of **justified**.

3.3 Conflict with NPPF Policy S5 – Spatial Hierarchy

Under Policy S5 of the updated NPPF (2026), land **outside** a defined settlement boundary is subject to strict limitations, permitting only:

- Agriculture
- Essential rural worker accommodation
- Genuinely limited infilling

A ten-unit housing site in open countryside is far beyond any accepted definition of “limited infilling” and therefore **cannot be considered justified or positively prepared**.

4. Updated NPPF (August 2026) – Wastewater Infrastructure and Deliverability

The updated NPPF strengthens requirements relating to:

- Wastewater infrastructure capacity
- Environmental sustainability
- Deliverability
- Avoiding development where infrastructure is inadequate

Little Bromley has:

- No mains sewerage
- No evidence of viable off-mains solutions
- No infrastructure capacity
- No deliverable wastewater strategy

Under the updated NPPF, MSA20 is **not deliverable, not sustainable, and not compliant with national policy**.

5. Unsustainable Location – Failure of NPPF Spatial Strategy

Little Bromley is a small, dispersed rural parish with:

- **No footpaths through the village** and no safe pedestrian routes connecting homes to services
- Rural public rights of way that do not form a cohesive or functional network

- Essex County Council designating the road network an **unsafe walking route** for schoolchildren
- No mains sewerage
- Limited potable water supply
- No shop, school, surgery, or amenities
- No employment base

5.1 High Car-Dependency – Conflict with NPPF Transport-Led Growth

The updated NPPF (August 2026) places strong emphasis on locating new housing near **well-connected public transport hubs**, particularly rail stations, to reduce car dependency.

Little Bromley has:

- No station
- No bus service
- No access to any public transport

Future residents of MSA20 would be forced to drive for every basic need — school, medical appointments, shopping, employment — directly contradicting the NPPF’s core sustainability objective of reducing reliance on private vehicles.

MSA20 therefore fails the national requirement for **transport-led growth**.

6. Failure to Consider the Emerging Little Bromley Neighbourhood Plan

Little Bromley Parish Council is preparing a Neighbourhood Plan, now at an advanced pre-submission stage. It:

- Identifies the parish’s unique rural character
- Sets out a clear spatial strategy
- Supports only small-scale, dispersed development
- Rejects estate-style layouts
- Prioritises affordable homes for local people, self-build, and eco-homes
- Provides evidence of infrastructure constraints, including the absence of mains sewerage
- Reflects extensive community consultation

Despite this, the Local Plan Review:

- Does not reference the emerging Neighbourhood Plan
- Does not consider its evidence
- Does not assess compatibility with the NP’s spatial strategy

- Does not explain why a major housing allocation is proposed in the smallest village in the district

The NPPF requires strategic policies to:

- Provide a framework for neighbourhood plans
- Support neighbourhood planning
- Take account of emerging neighbourhood plans
- Avoid undermining community-led planning

By allocating MSA20 without considering the emerging Neighbourhood Plan, the Local Plan is:

- Not positively prepared
- Not justified
- Not effective
- Not consistent with national policy

This is a clear soundness failure.

7. Conclusion and Requested Inspector Action

Little Bromley Parish Council respectfully requests that the Inspector:

1. Delete allocation MSA20 from the Local Plan, on the grounds that it is:

- Not legally compliant
- Not justified
- Not effective
- Not deliverable
- Not consistent with national policy
- Not supported by evidence
- Contrary to the updated NPPF (2026)
- In conflict with the emerging Neighbourhood Plan
- Incompatible with cumulative impacts of strategic energy infrastructure

2. Consider the procedural circumstances affecting Little Bromley, including:

- Late notification preventing meaningful participation
- Lack of clear information reaching the Parish Council
- The parish's inability to engage early in the process

3. Consider the wastewater infrastructure constraints, which make the site undeliverable and unsound.

8. The Parish Council's Position

Our position is clear and unequivocal:

MSA20 is an unsustainable, unjustified, and inappropriate allocation that should be deleted from the Local Plan.

The proposed new plan as a whole is not sustainable or credible; building thousands of new houses in open countryside with no existing jobs, employment, or supporting infrastructure is simply a terrible idea.