

Bradfield Parish Council (BPC)

Local Plan Comments

Horsley Cross Garden Village (HCGV)

It is appreciated that the area detailed by a coloured section on the TDC consultation map is only an indication of where development would be, however, because it is so imprecise it is difficult for BPC to fully understand the diverging points, levels of coalescence and local identity erosion.

However, in a recent communication from Gary Guiver (TDC Corporate Director for Planning), it is clear that the parish of Bradfield will be substantially impacted, if these plans come to fruition (see below).

“Horsley Cross is clearly affected significantly by the proposal for a new Garden Village – albeit, if the development does ever take place, it is expected to be longer-term and comprehensively planned from the outset. At this stage, the Council is only indicating the ‘broad location’ (a large proportion of which falls within Bradfield Parish) within which the development could happen and not necessarily all of the land identified will actually end up being allocated for development; however, the detail will follow through the preparation of a separate planning document and masterplan which could take a number of years to produce – potentially after Tendring District Council has been replaced by a new unitary authority to which planning powers will pass.”

Gary’s comments unfortunately do not provide any clarity upon which to develop fully informed and final opinions.

The TDC document proposes that the HCGV will provide 6,000 new homes and other essential infrastructure including:

- *Primary schools*
- *Secondary Schools*
- *A Community Building*
- *Primary Healthcare Facilities*
- *Sports areas*
- *Allotments*
- *A Village Green*
- *A Country Park*
- *Cycleways and Bridleways*
- *A Gypsy Site*
- *A Water Recycling Centre*
- *14 hectares (35 acres) of employment land*
- *A further 40-50 hectares (124 acres) of employment land when needed*
- *New access road junctions off the B1035.*

It would be easy to take the complacent option of assuming that these plans, if approved, may never happen, or only happen many years into the future, by which time there will certainly be a new Parish Council and a replacement Local Authority.

However, the existing BPC has a responsibility to seriously consider the plans as they are and represent local views in its response.

Questions:

Does the TARCHON Interconnector Project fit in with these HCGV proposals? BPC is aware that representatives of Copenhagen Infrastructure Partners (CIP) have been in consultation to build a Direct Power Interconnector at Horsley Cross. Two farmers whose farms are adjacent to Clacton Road, Horsley Cross, have been requested to make at least 25 acres of land available for the project by (CIP).

This construction, which would eventually link with Niederlangen in Germany would be as tall as the water tower at Horsley Cross.

Continuing plans exist to build an extensive solar farm covering land off the A120 including parts of Bradfield and Mistley. This land seems to be in the HCGV area. Is this also included in the HCGV development plan area?

According to the TDC document there will also be a 20% Biodiversity Gain. Bearing in mind this HCGV will permanently cover existing good quality agricultural land, currently supporting a diversity of wildlife and ecology, how will the diversity gain be achieved? Or will the compromise be to allow Government Biodiversity Credits to be acceptable, to be used (possibly, if ever) somewhere else?

It is the initial view of BPC that unless the Country Park, Village Green, Sports Areas, Allotments, Gypsy Site etc. are of a substantial and practical size, then there would not be enough land to also accommodate 6,000 new homes, with their private amenity spaces, together with secondary schools, primary schools, access roads etc., indicated in the plan. Is it not the case that the area indicated in the plan by the 'coloured blob' is far too small to accommodate the whole of the TDC proposals?

Just the construction of attenuation ponds (SuDs) to accommodate 6,000 homes and the proposed employment enterprises, would potentially occupy several acres of Horsley Cross.

Therefore, to achieve the creation of a new Garden Village at this location, neighbouring parishes are most likely to be subsumed into the morass. Is it not the case that coalescence with and incursion into neighbouring parishes is inevitable on a considerable scale?

As a justification for this development the document states, “...***the potential for large -scale development to be achieved with very limited impacts on the character and amenities of existing established communities.***” How can this possibly be guaranteed with these proposals on this scale?

The document states, “....**brings the potential to meet some of the significant demand for new housing in the north west of the district, which the Manningtree, Lawford and Mistley area is too physically constrained to meet.**”

Where is the evidence to support that there is “significant demand for new housing? There are already hundreds of homes in the progress of construction in the northwest of the district. Is there really a local demand for 6,000 more?

It is difficult to see in the TDC document where the Brown Field Sites and the government encouraged Grey Field Sites, are within the Tendring District. Are these being identified and considered? If so, where are they all, and how many dwellings would those sites accommodate?

In TDC’s deliberations resulting in these proposals, has the council worked in collaboration with immediate neighbouring authorities outside the county?

BPC is aware that significant housing developments, consisting of many hundreds of dwellings, are currently being constructed in Brantham and East Bergholt. Both parishes are in the county of Suffolk, but they are immediately adjacent to Manningtree and Lawford. They have Colchester Post Codes, and all their residents use the services and infrastructure, including schools, GP Surgeries, trains, shops, recycling facilities etc. in Lawford and Manningtree.

The TDC document concedes that the residents of an additional 6,000 homes being constructed at Horsley Cross, will be using Manningtree Railway Station (Lawford) and in all likelihood the medical facilities in Manningtree. Was there any recognition that these services are already being subjected to increasing levels of stress from residents immediately across the border in Suffolk?

Concerns:

The Government 2021 Census Data informs us that there is and will continue to be an average of 2.4 persons living in each dwelling in England. Therefore the 6,000 dwellings in HCGV will eventually accommodate at least 14,400 residents. This is almost the residential equivalent of Saffron Walden in Essex, which is classified as a Market Town and not a Garden Village.

Developers have a clear aspiration to build family homes as the profit margin is much higher than gained from building small units. Therefore, it can be realistically assumed that the resulting population of the HCGV has the potential to eventually exceed 14,400.

The document states (para v) “**Development that provides for a truly balanced and inclusive community and meets the housing needs of local people...**”

Where is the evidence for this statement that 6,000 homes will be required to furnish the needs of ‘local people’?

It is stated in the TDC document that 30% of the dwellings built will be 'Affordable'. However, there is insufficient detail in the document to determine if this is a realistic aspiration. Developers are currently having difficulty in attracting bids for Affordable Homes from Housing Associations. In some parts of the country a great many new Affordable Dwellings remained empty, until the Government allowed them to be released at market value.

Who will be eligible to purchase or rent the 1,800 (30%) affordable homes in the HCGV? We realise that these details are unlikely to be available at this stage, however, BPC would be interested to see the projected local demand data for affordable homes, on this scale, in the HCGV, considering this is just one of the sites put forward by TDC.

The number of older people in Tendring District is disproportionately higher than in many other districts. This is unlikely to change. The general population in the UK is aging. However, there is no recognition of this in the TDC document. There is a real demand for affordable Adult Social Care accommodation and good quality bespoke homes built with a 'down-sizing' older resident in mind.

In 1990 bungalows accounted for 11.00% of all new build dwellings in the UK. In 2024 this percentage had dwindled to just 1.00%

If sensitively provided these facilities have the potential to release family homes back into the general available housing supply. In the TDC 'wish list' this seems to have been entirely excluded.

Traffic:

Due to the ongoing and considerable housing developments in Mistley and Lawford, the traffic flow along B1035 Clacton Road has already increased exponentially. It is obvious that this problem can only be exacerbated.

The most direct route to the A12 and A120 from the Forrester Road development in Mistley (235 new dwellings) and the Stour View development in Mistley (72 new dwellings in early construction phase) is through Windmill Road/Straight Road/Steam Mill Road, Bradfield, joining the Clacton Road to access the Horsley Cross roundabout.

The most direct route to the A12 and A120 from the Lawford Green and Manningtree Park developments in Mistley and Lawford (collectively 925 new dwellings still under construction) will be via Clacton Road, to access the Horsley Cross Roundabout.

It is already increasingly difficult and not without some risk, to exit Bradfield from Stream Mill Road onto the B1035, due to the increased volume of vehicle movements along Clacton Road and the limited visibility.

In Mistley parish there are still approximately 400+ homes yet to be built in the three sites but currently under various stages of construction (Rose Builders and City &

Country). This will obviously continue to increase the traffic volume through Bradfield and along the B1035 Clacton Road.

The TDC document includes in the HCGV, a provision of Primary Healthcare Facilities. However, it is also stated that the alternative would be to enhance the facility in Manningtree. The existing facility in Manningtree cannot be further improved on the existing site. The current small building exists on a series of temporary planning approvals.

Therefore, a major relocation and redevelopment will be required in Station Road Lawford. The BPC understands this is the favoured option.

Residents of the HCGV will presumably further increase traffic along Clacton Road in order to access these health facilities in Manningtree.

Included in the Manningtree Park housing development is a plan to build a substantial supermarket including a 150 space car park, with access off the Clacton Road (City & Country site) in Mistley. Visitors to this shopping facility will also increase traffic volumes along the B1035 Clacton Road.

There is currently no Sixth Form facility serving the students in the Lawford, Manningtree, Mistley, Bradfield parishes, and all the other linked and surrounding parishes (including Brantham in Suffolk). At present students must travel to Colchester or Ipswich on a daily basis, and generally by train.

It is unclear from the TDC document whether the HCGV would include Sixth Form College facilities for its hundreds of post-GCSE students. Two issues arise....

(1) If the HCGV includes a Sixth Form (covering several acres) then students from all the existing parishes without that educational facility will be travelling back and forth on a daily basis to the HCGV. Further increasing the traffic volume.

(2) If there is no Sixth Form College included in the HCGV then where will those hundreds of new students go for their further education? Colchester facilities are already at saturation point.

BPC notes that in the TDC documents it is accepted and planned that the occupants of the 6,000 new dwellings in the HCGV will use Manningtree Railway Station (in Lawford) to commute to London or Norwich.

Despite the aspiration of providing Rapid Transport Links, experience shows that commuters continue to rely on the convenience of using their own cars to access railway stations. Manningtree Railway Station will not be within walking or cycling distance of the HCGV. Thereby commuters will further increase traffic volume on the B1035 Clacton Road.

Recent data shows that approximately 1,300 commuters a day currently use Manningtree Railway Station. Have the railway station, the approach roads, the car park and the access junctions the potential to absorb the inevitable increase in commuters from the HCGV, as well as the new commuters living in newly built homes in surrounding villages, including those in Brantham and East Bergholt?

Manningtree Railway Station roundabout and the rail underpass are already a serious traffic congestion and collision pinch point, which planners have been unsuccessfully trying to resolve for decades.

Many of the new occupants of the Lawford Green and Manningtree Park developments under construction are enticed here from London, because housing is cheaper and there is a main line rail link to London that is within walking or cycling distance. This easy access will not be the case with residents of HCGV.

The residents of the 6,000 homes will still have to travel to Lawford, Manningtree and Mistley to access services. Many will travel through Bradfield.

Cultural & Environmental Changes:

Such a development of 6,000 homes, together with the essential infrastructure required to sustain it, will inevitably change the nature and character of Bradfield. Indications and information from Mr. Guiver show that some of the development would be in the parish of Bradfield.

If this project goes ahead Bradfield Parish will be changed from its current identity of a pleasant semi-rural village, with many historic features. Despite all assurances which we are sure will be given, Bradfield will be subsumed into the significant urban town built in it, on its shoulder, and around it.

The existing recreational benefits of some rural walking routes currently enjoyed by Bradfield Residents from their own homes will change irrevocably or be lost.

There will be considerable environmental and amenity intrusions, especially to the residents in the west of Bradfield, these will be obvious in terms of substantial traffic increases and pollution, increase of noise and light intrusion. It is most likely that Bradfield residents in the west of the village will lose their dark skies and be able to hear the persistent low level and intrusive noise created by over 14,000 residents living in extremely close proximity to them.

Bradfield village is currently a haven for wildlife, which benefits from the open agricultural spaces in and around its borders. This will inevitably and negatively be impacted if these proposals go ahead.

The density of housing and the installation of commercial and industrial employment will significantly increase air pollution from current levels. Poor air quality in the UK is believed to result in at least 30,000 deaths annually. This is supported by the research team at Queen Mary University of London.

These increased levels of air pollution from this development will disproportionately affect those currently living in a semi-rural environment, with good air quality.

Sustainability:

Tendring is being directed by central government to double the planned number of dwellings constructed annually in its local plan, from 550 to 1,063. This demand seems to have driven Tendring District Council to propose the construction of a huge housing development in the hamlet of Horsley Cross. It is the view of BPC that this development would be entirely inappropriate at that location.

To even call it a 'Garden Village' is misleading, as the ensuing population, together with the essential supporting infrastructure, would be similar to that of many small towns in the country.

BPC is aware that the existing sewage structure and access to water is already under considerable strain in our area. Sir Bernard Jenkin, the Member of Parliament for Bradfield, has been working in support of village residents who are the victims of inadequate systems. He is negotiating with the relevant utility companies to improve their services for existing Bradfield residents.

Essex and Suffolk Water, Affinity Water and Anglian Water were among the 11 companies formally notified about the security of supply risk concerns in 2025. Ofwat, the Environment Agency and the Environment Department (Defra) raised concerns as part of the annual review of their water resources management plans, which cover the period from 2020 to 2045.

Regulators shared their concerns that supply limits in each of the areas indicated would hinder growth and sustainable development as potential new users must be turned down, due to inadequate water supplies.

Does TDC accept that the conclusion by official regulators raises considerable doubt about the sustainability of water supplies for the huge increase in demand by the domestic, commercial and industrial users in the HCGV?

The Agriculture and Horticulture Development Board (AHDB), which is a statutory board concerned with the supply chain of food, has reported that in the 2025 harvest year, **wheat imports** to the UK are forecast to rise by 2.75 million tonnes, a 13% increase from the previous year. Imports of oilseed rape will also increase significantly as UK production fell by 32%, driven by factors including a sharp reduction in planted areas.

The TDC document fails to acknowledge that the hundreds of acres it proposes to have covered in concrete is already a place of considerable and essential employment. Farmers are employed there day in and day out growing and providing food, on good quality agricultural land, for our increasing population. We can see no acknowledgement of the need for Food Security, in these proposals.

It seems some of the driving justifications for such a massive development at this particular location would be its reasonably close proximity to Harwich Freeport and as a source for raising the funds to upgrade the A120 to Harwich. ***“Development at Horsley Cross also has the potential to facilitate and help fund upgrades to the A120 to support Freeport East, the delivery of long-term port expansion at Bathside Bay and the wider objectives for economic growth....”***

Surely this is a perverse logic. Is the building of 6,000 homes around a roundabout the only way to secure funding to upgrade a road?

This motivation also contradicts other statements in the document, which state that the proposal meets a need to provide locally required dwellings. This statement does not stand scrutiny.

The homes and the infrastructure are planned to be built around the existing A120 junction and the B1035. These roads in their present form will be entirely inadequate to accommodate the increased traffic volume and the road accesses required.

But it seems to mitigate this problem TDC is proposing to build 6,000 new dwellings and a huge amount of infrastructure.!

It is understood from the TDC document that a Development Plan Document (DPD) will be prepared and at that stage the definitive boundaries of the HCGV will be set. A Planning Application will then be submitted when the DPD is agreed.

Considering that Tendring District Council, together with its District Planning Responsibility is very unlikely to exist beyond early 2028, what is the timeframe for the presentation of the DPD and which authority will consider it for approval?

BPC notes in this document that this development would be planned to occur in slow time, although it is also proposed in the document that the HCGV will, ***“start delivering new homes from 2033...”*** This is just seven years away.

It is an established process that the detailed plans, submissions and approvals, construction of access roads, the essential supplies and the utility structures etc., will take at least three years before any ‘new homes are delivered’. Therefore, if these significant proposals are accepted, will the process begin in around three years from now?

As soon as the Local Plan is approved the existing homeowners in and around Horsley Cross and Bradfield will be materially and negatively affected. Who will want to purchase an existing and established home in Horsley Cross, or in some areas of Bradfield, once these plans are approved? The approved plan, albeit providing homes in “slow time” will blight existing homeowners living in close proximity to the planned developments.

BPC fully appreciates that some new homes need to be planned for the future. However, the local authority also has a moral duty to consider first and foremost what the genuine and evidenced local need will be, especially for the upcoming generation and its demographics. It is also essential that the plans should not significantly and negatively impact the existing communities.

It is the view of BPC that these plans appear to be a complete capitulation to the Algorithms used to determine housing numbers which are then callously mandated by central government. For the reasons stated this section of the proposed local plan is unsustainable.

It may be a cynical observation, but it is clearly easy for a local authority, which is in the closing period of its existence, to create an unrealistic and unsustainable local plan, to satisfy the equally unrealistic house building targets imposed by national government. Knowing that it will never be the authority charged with delivering those unsustainable plans.

It is the view of BPC that the Local Plan, including a proposal for a Horsley Cross Garden Village should not be approved, and the Proposed Local Plan should be seriously reconsidered.

Windmill Road – Extension of Development Area (WR)

The TDC document indicates that a development within Bradfield Village should be the construction of 100 new dwellings, at one site in Windmill Road.

Some months ago, BPC was part of an on-line information session with TDC Planners. At that time, it was suggested by TDC that between 30 and 100 new homes could be accommodated in one of several sites in Bradfield Parish. It now appears that any figure below 100 has been disregarded and the number of sites is reduced to one.

Although an additional one hundred dwellings built at this location in Windmill Road represent just 0.6% of the government mandatory housing number for TDC, it is a 20% increase in the number of homes in Bradfield. The TDC document however shows no recognition of this significant increase in housing or proposes any upgrades or improvements to the infrastructure or facilities in the parish of Bradfield.

The development of 100 new homes constitutes an obvious housing estate. This proposed estate in Windmill Road would be larger than two significant new housing estates, recently constructed and in the process of construction in neighbouring Mistley (New Road = 76 dwellings and Stourview Avenue = 72 dwellings).

This proposed development, resulting in one hundred new homes, on a large site at the very edge of the parish boundary would be outside the current development area. It would be disconnected from the centre of the village and is a disproportionate over-development. It does nothing to enhance social integration.

One hundred homes at this location would be the largest concentration of dwellings in the parish. It has the potential to create an isolated community, rather than an integrated one.

A concentrated development of 100 new homes at this one location in Windmill Road will be entirely out of character with the way that Bradfield has developed over generations and will result in a cultural shock.

Developers prefer to build houses, as they occupy smaller footprints and make more profit. However, the imposition of 100 new homes at this location in our village takes no account of local need. However, the creation of an isolated housing estate, disconnected from the village, will no doubt be attractive to developers.

Bradfield Parish Council recently commissioned a Parish Housing Needs Survey. This was conducted by the Rural Community Council of Essex (RCCE). The results demonstrate a limited local need. The results are detailed below:

- 4 x Affordable Rented Homes (1–3 bedrooms)
- 2 x Shared Ownership Homes (2-bed house and 2-bed bungalow)
- 2 x Open Market Homes (2-bed flats or 3-bed bungalows)

It is the view of BPC that there are some limited opportunities for a small number of new homes to be built in the parish, supporting local need. But they must be integrated within the existing community and not create an isolated one.

Lawford and Mistley are continuing to absorb hundreds of new homes being built on large developments in those parishes. Is there honestly an identified need for another 100 homes to be built within a mile of those developments in the neighbouring parishes?

The TDC document suggests that 30% of the dwellings built would be 'Affordable'. Which authority would own the nomination rights for the 30 Affordable Houses built at this location? Clearly Bradfield Parish does not have such an identified local need.

BPC notes that the affordable housing built in some of the new local developments has not been particularly attractive to Social Housing Providers. Many Housing Associations have declined the opportunity to purchase Affordable Housing, for a variety of reasons.

Family homes, unsurprisingly home children. The proposition to build one hundred family homes will result in a considerable number of new children living in Bradfield. However, there is just one primary school in the village, which is a mile each way, from the proposed development, making walking and cycling unrealistic.

The majority of that route does not have the benefit of pavements. The dynamics of Windmill Road would not support adequate additional land being available for the construction of pavements.

However, Bradfield Primary School is also oversubscribed with waiting lists. Due to the school's location, on a small footprint, and sitting within existing dwellings, extensions or redevelopment are not feasible.

Bradfield Parish has just one moderately sized recreation ground, which is owned and controlled by an Allotment Charity. The recreation ground is 1.4 miles each way from the proposed site for 100 homes. Again, making walking to this facility unrealistic.

A small site elsewhere in the parish currently provides allotments. It is owned by the Church of England. If at any stage the church claimed back any of the 'allotment land' then a considerable section of the existing recreation ground must, according to legislation, then be made over to allotments, further reducing the only public amenity space in the parish.

The proposed plans make no provision for additional recreational space.

Bradfield Parish Council does not support the construction of 100 dwellings at the proposed site in Windmill Road Bradfield. The plans are unrealistic and unsustainable.

Bradfield Parish Council
3rd March 2026