

Bradfield Parish Council (BPC)

Local Plan Comments (October 2026)

Horsley Cross Garden Village (HCGV)

The initial comments of BPC concern the uncertainty of the Government plans for Local Government Review.

On the 16th December 2024 the Government Ministry of Housing, Communities and Local Government published the **English Devolution White Paper**.

On the 26th September 2025 Essex County Council and the Unitary Authorities of Southend-on-Sea and Thurrock submitted their plans for Local Government Reform in compliance with the Government statutory requirement.

Since those dates Tendring District Council has been working industriously on the current Draft Local Plan document, secure in the knowledge that the responsibility for implementing those plans would not fall to TDC as it would cease to exist. In its place would exist the new **Mayoral County Combined Authority** (page 237 para 9.58).

On the 7th September 2026, the Secretary of State for Housing, Communities and Local Government made an announcement to Parliament that the decisions regarding reorganisations of local government in respect of Essex, Southend-on Sea and Thurrock (as well as other authorities) **are withdrawn**.

There does not seem to be any future date or process indicated for Local Government Review. Therefore, the proposals and responsibilities for implementing these plans return to Tendring District Council.... presumably?

Is/will TDC be adequately skilled and resourced to manage such a long and significant project?

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, even in this revised iteration subject to consultation, it remains extremely imprecise. Therefore, it is difficult for BPC to fully understand the diverging points, levels of coalescence and local identity erosion.

The desire for clarity is not ameliorated by the proposed location of the Garden Village being titled as the 'Horsley Cross Garden Village'. Horsley Cross is now and has historically been a small hamlet as part of the parish of Mistley.

However, in previous communications from Gary Guiver (TDC Corporate Director for Planning), it was confirmed 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.”

This is somewhat contradicted by the statement in the Draft Local Plan which says, **“Clear separation will be maintained between the new Garden Village and the communities within the Parishes of Tendring and Bradfield through the designation of Strategic Green Gaps.”** (page 238)

So, which is it?

BPC does understand that this latest (final) draft of the Local Plan is unlikely to provide specific boundary markers, acreage sizes and the coterminous points in the proposed development. However, BPC therefore has difficulty in assessing the actual impact on the village of Bradfield. BPC expects the Parish Councils of Mistley and Tendring may have the same difficulty.

Whilst the TDC document remains imprecise the proposals of what will be contained within the HCGV are very clear and detailed. The HCGV will eventually provide 6,000 new homes and other essential infrastructure, which is detailed in the document. A sample of these is below:

- *Primary schools x 3*
- *Early years & Child Care Facilities*
- *Sufficient Land for SEND Requirements*
- *A Secondary School & Sixth Form College on a site of 7.9 hectares (20 acres)*
- *Connections to a Rapid Transport System*
- *A Community Building/s*
- *Primary Healthcare Facilities*
- *Accessible Sports Areas with Associated Facilities and Play Facilities*
- *Indoor Leisure and Sports Facilities*
- *Allotments*
- *A Central Village Green*
- *A Country Park with Community Parks*
- *Cycleways and Bridleways*
- *A Gypsy Site*
- *A Wastewater Recycling Centre*
- *50 – 60 hectares (149 acres) of employment land*
- *New access road junctions off the B1035 to accommodate new housing, infrastructure and industry.*
- *A 20% increase in Biodiversity*

It would be easy for BPC to take the complacent option of assuming that these plans, if approved, will only happen many years into the future, by which time there will certainly be a new Parish Council. However, the existing BPC has a responsibility to seriously consider the plans as they are. The Parish Council therefore has a duty to represent local views in its response.

Questions:

BPC has asked some of these questions before, but they remain without clarity.

(1) Does the TARCHON Interconnector Project fit in with these HCGV proposals? BPC is aware that representatives of Copenhagen Infrastructure Partners (CIP) is still in consultation to build a Direct Power Interconnector at Horsley Cross. At least 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 and would be clearly impactful and visible. It would also require a substantial road access and other associated buildings

(2) 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?

(3) In 2025 the current government designated Data Centres as **Critical National Infrastructure**. It emphasised that it was in its strategy to 'fast track' their roll out. The government views Data Centres as, ***“underpinning public services and crucial to attract investment...”***

It is accepted that Data Centres are huge and consume massive amounts of power and water.

The government will imminently publish its policy statement for Local Government on Data Centres. Considering what the TDC Local Plan is seeking to achieve, with significant trade corridors, linked to a Free Port, Green Energy Hub and international trade via Harwich, will a Data Centre also be required in or adjacent to the new 'Horsley Cross Garden Village'?

It is clear that the UK Government is driving planning and other innovations in the country. As an example, (it is believed) using an algorithm, the government determined that the housing targets for district authorities across the country would be significantly increased from previously agreed building targets. Tendring District has also experienced this unprecedented increase.

The government has also overridden local decisions to approve data centres and huge solar farms in other counties.

Therefore, has TDC officers any confidence that approvals for these and other energy projects will not be approved by national government and added to the plan?

These questions are important and relevant. Will the undefined and imprecise area of pink in the plan be sufficient to accommodate all that is contained in the plan, including what the government is likely to insist upon?

(4) The new consultation document maintains that 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 and where will the diversity gain be achieved?

It remains the view of BPC that everything indicated in the HCGV plan cannot be accommodated within the area indicated by the pink shaded area and also achieve a 20% Biodiversity Gain.

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.

Is the Biodiversity Compromise to allow Government Biodiversity Credits to be acceptable, to be used (possibly, if ever) somewhere else?

It is the experience of BPC that TDC Planning Department (& Enforcement) has an extremely poor record in protecting Biodiversity habitats in Bradfield.

(5) Is the unstated fact in this document that to achieve the creation of a new Garden Village at this location, neighbouring parishes will inevitably be subsumed into the new urban settlement, which in reality will be a small town.

Is it not the case that coalescence with and incursion into neighbouring parishes is inevitable on a considerable scale?

(6) The document states that the development at Horsley Cross will meet the significant demand for new housing in the northwest of the district, which the Manningtree, Lawford and Mistley area is too physically constrained to meet.

A large percentage of the hundreds of new homes being built in Lawford and Mistley are acquired by people moving into the area who have no local connection. Where is the evidence to support that there is “significant local 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?

(7) The plan states (page 235 para 9.56) that “Where appropriate, developers will be expected to contribute towards any publicly funded infrastructure”.

This is concerning. Considering the scale of infrastructure required and the cost, the majority of funding must come from central government. The Department for Education in its ***Education Estates Strategy – A Decade of Annual Renewal 2026***, states that the building cost of each primary school is around £2,900.00 per square meter and a secondary school costs “tens of millions” to build.

The Office for National Statistics reported that government borrowing and debt in August 2026 was the highest since records began in 1976. In August interest payments on the national debt costs were £3.5 billion more than forecast.

In 2025 national journalists reported that thousands of homes have been built on developments all over England and the infrastructure included in the plan has never arrived. These failings have included schools, shops, GP Surgeries, recreational space and children's play areas etc.

Many of these estates remain unadopted.

BPC realises that TDC is required by government to publish a Local Plan, and it states within that plan that house building will not be approved or completed before that infrastructure is in place. Realistically is that actually likely to happen, with the ongoing state of the country's finances?

(8) 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.

Those Suffolk parishes are witnessing significant increases in housing development, but other than a larger Co-op Local store in East Bergholt, there seems to be no significant increase in supporting infrastructure.

BPC notes an addition in the Draft Local Plan that TDC is now evidencing some cognisance of the increasing population just the other side of our county boundary. However, this significant demand upon the resources and infrastructure of Lawford, Mistley and neighbouring parishes, is not mitigated in the planned increases in housing on the Essex side.

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.

Why is there not more acknowledgement that there is already competition from Suffolk residents, for the facilities and infrastructure in Lawford and Manningtree, before thousands more homes are built in Tendring?

(9) 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.

Does TDC accept that this estimated population in just HCGV has the potential to overwhelm any resources outside the HCGV?

(10) 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.

The October 2025 report by the Home Builders Federation (HBF) stated that there were more than 900 Affordable Homes which have been completed, without any Housing Association being prepared to bid for them.

Also contained in the HBF Report was the statement that "Around 8,500 Affordable Homes, due to be built in the next 12 months are at risk, as social housing providers pull back from taking on new Section 106 Contracts. This is causing delays to housing delivery and undermining national housing targets"

BPC realises that the 1,800 (30%) of Affordable Homes in the HCGV site would not be built for a few years, but does TDC concede that there is a diminishing appetite from the providers of Social Housing to acquire more Affordable Homes?

(11) 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 little 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 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. Why is this?

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 350+ 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 indicated that the new residents will use 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.

Even if an enlarged medical facility was relocated within Manningtree, it will be overwhelmed by the new residents of the HCGV without a substantial facility located in the Garden Village.

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 modest supermarket including a 100 space car park, with access off the Clacton Road in Mistley. Visitors to this shopping facility will also increase traffic volumes along the B1035 Clacton Road.

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 (which potentially will be buses), 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 in the HCGV will still have to travel to Lawford, Manningtree and Mistley to access rail transport and other 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 a not insignificant proportion of the development is likely to 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, increases 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.

It is noted that a Health Impact Assessment (page 49) will be carried out in respect of all developments of more than 50 dwellings. It is the view of BPC that such an

assessment should be carried out for the benefit of the residents of all neighbouring parishes now, to determine baseline data.

Sustainability:

(S1) 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 disproportionate at that location and is unlikely to be constrained within the indicated area.

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.

(S2) 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 sewage systems. He is negotiating with the relevant utility companies to improve their services for existing Bradfield and Mistley 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.

Essex is consistently one of the driest places in the country. However, BPC has not identified in the Draft Local Plan the construction of a new reservoir anywhere in the HCGV. This seems to be a glaring oversight considering the present concerns of water regulators.

These plans for increased housing and industry on this scale will create a monumental demand for water (even without a Data Centre). Does this not concern the planners formulating this Draft Local Plan?

(S3) 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 climate factors including a sharp reduction in planted areas.

The 2026 yields from crops supplying staple foods are predicted to be down by around 20% and this from a previously reduced harvest.

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 and food production on good quality land.

Farmers are employed there day in and day out striving to provide food in a difficult climate, for our increasing population. We can see no acknowledgement of the need for Food Security, and how it will be enhanced by these revised proposals.

(S4) The document provides scant details concerning efforts to combat or ameliorate the results of climate change and the resulting weather conditions. There is a bland statement which reads, **“To provide resilient developments that reduce carbon emissions and are ready to adapt to and mitigate the effects of climate change.”** How is this to be achieved?

Opinion:

It seems to remain that one of the driving justifications for such a massive development at Horsley Cross would be its proximity to Harwich Freeport and Bathside Bay as a source for raising the funds to upgrade the A120 to Harwich.

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 into the new 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 on the existing communities.

It remains 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.

Bradfield Specific - Extension of Development Area:

Proposed development sites included in the draft plan include:

Windmill Road – 20 Dwellings

Wix Road - 25 Dwellings

The Street - 30 Dwellings

BPC acknowledges that this revised plan has taken notice of the previous comments made by BPC regarding disproportionality, isolation and sustainability. The three separate locations indicated in the revised plan are now either within or adjacent to

existing settlement boundaries in Bradfield Parish and represent an improvement, and the reduced number of dwellings are likely to be integrated.

It is noted by BPC that these new homes feature in the 2026/27 to 2030/31 column in the Table **LP1 Local Plan Housing Allocations** (page 65) of the revised Local Plan. Is it to be assumed that planning consent for these three areas will be imminent?

Whilst BPC welcomes this amendment, it does remain that Bradfield has just one very modest area of recreational space for public use. A planning gain of an extension to Bradfield's recreation ground would be welcomed.

Bradfield Primary School is very popular and oversubscribed. 75 new homes have the obvious potential to result in more children in Bradfield. Whilst this is welcomed, discussions must be had with the headteacher regarding sustainability.

Bradfield Parish Council recently commissioned a Parish Housing Needs Survey. This was conducted by the Rural Community Council of Essex (RCCE). The results demonstrated a limited need for more dwellings in the parish, which contribute to social cohesion and intergenerational support.

Therefore, affordable rented homes for local residents, shared ownership and downsizing bungalows.

BPC supports the proposition (page 357) for Alternative Arrangements for the 'Gifting' of affordable housing to a local Housing Trust. Thereby retaining the homes for local people on a rotational basis. This could be achieved within the small housing developments in Bradfield.

Bradfield Parish Council
07th October 2026