



For Internal Use only	ID:	Rep No:	

Draft Local Plan

RESPONSE FORM

Responses are encouraged via the council's online consultation system available on the website, see <http://tendring-consult.objective.co.uk/portal> However, this form can be returned electronically to planning.policy@tendringdc.gov.uk or in hard copy if necessary to:

Planning Policy, Tendring District Council, Thorpe Road, Weeley, Essex, CO16 9AJ
The consultation runs from 9am Friday, 16th June to 5pm on Friday, 28th July 2017

This form has two parts:
Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Silverton Aggregates"/>
Address Line 1	<input type="text" value="c/o agent"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Peter"/>
Last Name	<input type="text" value="Le Grys"/>
Organisation	<input type="text" value="Stanfords"/>
Address Line 1	<input type="text" value="Livestock Market"/>
Address Line 2	<input type="text" value="Wyncolls Road"/>
Address Line 3	<input type="text" value="Colchester"/>
Post Code	<input type="text" value="CO4 9HU"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

PART B

REPRESENTATION FORM

Please Note: If your representation relates to Section One of the North Essex Strategic Plan / Garden Communities you only need to respond to one of the Local Authorities. All representations received by Braintree, Colchester and Tendring relating to Section One of the Plan(s) will be submitted together.

You do not need to return this form if you have completed a response using any of the Council's online systems for this consultation. Duplicates will not be considered

Please specify which section of the Publication Draft Local Plan your comments relate to by choosing one of the following:

Section 1 Section 2 Colchester Section 2 Tendring Section 2 Braintree

Which part of the section are you responding to?

e.g. Paragraph/Policy/Map/Other

Do you consider the Local Plan is Legally compliant?

Yes No

Does It comply with the Duty to Co-operate?

Yes No

Do you consider the Local Plan is Sound?

Yes No

If you do not consider the Local Plan is sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

Continue onto next page

If your representation is more than 100 words, please provide a brief summary here:

Please specify the changes needed to be made to make the Plan sound / legally compliant

Amend settlement boundary

Do you wish to participate at the oral part of the examination?

Yes No

If Yes - you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

To fully examine the approach adopted by the Council towards starter homes

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Did you raise the matter that is the subject of your representation with the LPA earlier in the process of the preparation of the Local Plan

Yes No

If yes which stage

Issues and Options Preferred Options

Do you wish to be notified?

When the document is submitted for independent examination?

When the Inspectors Report is published?

When document is adopted?

Braintree & Tendring: Return by 5pm 28th July 2017

(responses to section 2 Braintree and Tendring will not be accepted after this date. After this date responses to Section 1 should be sent to Colchester Borough Council)

Colchester: Return by 5pm 11th August 2017

112 - 118 Oxford Road, Clacton-on-Sea

Policy PP6 is considered to be ambiguous and unreasonable in the form suggested seeking to protect sites without a clear understanding of the issues that apply to each of these sites. The site subject of this objection is located to the south east side of Oxford Road. The premises comprise of a two-storey, flat roofed warehouse unit with a pitched roofed rearward projection which is currently occupied by Silvertown Aggregates, a company specialising in the storage and sale of sand, gravel and other similar ground surfacing materials. The southern part of the site is enclosed by a 2 metre high palisade fence and is used for the open storage of aggregates and other building materials.

Oxford Road comprises of a mix of commercial/warehouse units, car repairs and sales, tool hire, sign makers, offices and tile suppliers etc. and falls in the B1 (a, b and c), B2 and B8 Use Classes Order. Residential development has been granted permission in recent years to the southern part of Oxford Road, with No. 62-64 Oxford Road being the most recent (references: 07/00991/OUT, 08/00712/DETAIL and 09/01072/FUL).

The NPPF sets out the core planning principles which should underpin the planning decision-making process. The core principles that are pertinent to this case is that planning should either:-

- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
- Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; and
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and

- Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

It is envisaged that the development of this site would comprise of 1 and 2 bedroom starter houses and/or flats and the buildings will be no more than three-storey in height. The height of the development would be comparable with the newly constructed housing development at No. 62-64 Oxford Road.

It is considered that smaller commercial units could be provided at ground floor level in part that would provide an active frontage to Oxford Road and encourage employment opportunities within an area which is designated as an 'employment site'. Further, commercial units would be beneficial to the local community considering the site's close proximity to existing residential properties on Valley Road.

It is noted that GVA Grimley Ltd were commissioned in 2010 by the Council to undertake a 'Stage 2' Employment Land Study to inform their evidence base underpinning the key elements of the Council's emerging Local Plan. The Stage 2 ELS includes a critical appraisal / review of the existing employment land supply in the District compared to forecast needs over the plan period. The Stage 1 ELS identified a requirement for 15.5 ha of B Class employment land for the District between 2006 and 2026. This is split into 12.1 ha of demand for office uses with the remaining 3.4 ha in industrial and warehousing uses. In respect of Clacton, the supply of allocated B Class employment land was shown to be more suitable for office development. This is in line with economic forecasts which predict growth in office land and decline in industrial and warehousing land. There is industrial availability within the market area, and this is strongly aligned with the existing industrial activity primarily around Gorse Lane Industrial Estate. This supply was considered appropriate to meeting local need. Further to this the employment potential within Clacton is heavily linked to the wider residential growth aspirations for the town including a significant scale of housing development within the emerging Local Plan.

The principal results coming from the Employment Study noted that the vast majority of new jobs in Tendring are likely to come from the service sectors including retail, leisure and

tourism, health, social care and education. This growth would primarily be driven by regeneration in the district's town centres, a more positive and inventive approach to tourism and the increase in resident population brought about by new housing and mixed-use development; Higher-tech and higher paid jobs in the office sector could come forward through the provision of high-quality office developments in the district; The industrial and warehousing sector is likely to see a decline which reflects both national trends and the very specific locational requirements of businesses in this sector.

Nevertheless, the Council recognised that there was a limited supply of sites for 'bad neighbour' type uses that often required a significant land area particularly where open storage activities were involved or the storage of a large number of vehicles. For this reason, planning permission was obtained by Robinson & Hall LLP in January 2012 (reference: 12/00026/OUT) on behalf of a local landowner for an extension to the Gorse Lane Industrial Estate involving 6.96 hectares (7.3 acres) to the north of Telford Road, Clacton-on-Sea. This approval has therefore secured sufficient employment sites for the town. As the Telford Road site is in an extremely accessible location and primarily offers land at a competitive rate for storage (B8) operations, the land owner of the site is in advanced negotiations to relocate their existing business. With modern facilities and additional land that would be available to the applicant upon the new industrial estate, the current occupier does not consider it to be appropriate or viable to modernise or upgrade the existing sub-standard buildings.

The site owned and operated by Silverton Aggregates clearly falls into the category of an under-utilized site, located close to the town centre and railway station, on a bus route and within walking distance of all local facilities. Residential properties are found immediately to the west within the immediate hinterland, while other former commercial sites along Oxford Road have seen redevelopment for housing purposes. The current business is inefficient in land use terms as it primarily involves the open storage of aggregates and building materials serving the building trade that has no justification in occupying a fringe town centre location. All vehicle movements are of a commercial nature, involving substantial HGV's into and around a residential environment, often through Great Clacton or Holland-on-Sea. Noise and dust are difficult to control while planning permission has previously been granted for a waste transfer facility and weighbridge. The premises themselves are also outdated. The company is extremely reluctant to spend money on improving a site which only has limited capacity to meet modern commercial expectations. The need to find alternative premises is therefore essential, although the capital to fund such an enterprise still remains considerable and which can only be achieved through a largely residential development. A direct

consequence of any relocation would be first to safeguard those existing jobs and secondly enable the company to expand and develop in line with the market for the 21st Century.

The site is considered to be in a highly sustainable location. Local facilities and services are within walking distances and a comfortable distance where they can be cycled to. The site is also in close proximity to bus stops into town and to the Gorse Lane Industrial Estate. Clacton railway station is also a short distance away with regular train services to Frinton/Walton, Colchester and London. On the basis of the above, it is considered that the application site is within a location where future occupiers would have access to local community facilities as well as access to employment opportunities through public transport links.

To date we have experienced the Council's rather unhelpful approach to preventing the re-use and redevelopment of the site for residential purposes where their existing use has become inappropriate or redundant through the demands and needs of the business community in the 21st Century. The approach suggested within draft Policy PP6 maintains this resistance to change, requiring excessive and unnecessary barriers to be overcome, often far beyond a proportionate response to seeking the retention of employment land. It is suggested at the very least that the policy should be better defined. In this instance the site could be better used for providing starter homes in accordance with the government's initiative, providing a material benefit for the younger population of the town.



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Project: Change of use to form new
 Waste Transfer Station,
 Chaston Business Centre, 112
 Oxford Road, Clacton, Essex

Drawing: Site Location Plan
 Planning Submission

Scale: 1:1250 Date: Sept 2012 Drawing no.: 844-30