

Illustrative layout views



Mistley Station



The Abbey and New Housing

Illustrative layout views



Swan Basin



Swan Basin / High Street



Appendix 4

**Copy of agency advice from Whybrow
regarding demand for employment floorspace**

Property: EDME Site, High Street, Mistley, Essex CO11 1HG
Client: Anglia Maltings (Holdings) Ltd
Date: 15th August 2016



Advice Report

PROPERTY: EDME Site, High Street, Mistley, Essex CO11 1HG



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Date: 15th August 2016

1. Property Details

i. Executive Summary

Property Details	
The Client	Anglia Maltings (Holdings) Ltd.
Client Instruction	Mr Vincent Gabbe – VRG Planning.
Purpose of Report	<p>To provide updated advice on the following:</p> <ol style="list-style-type: none">1) An analysis of the type of demand for the site encompassing Class B1 (Light Industrial), Class B2 (General Industrial), Class B8 (Warehousing /Distribution). This advice relates to occupier demand for both the existing buildings and for a new development of similar uses. We were previously advised to assume a development of up to 10,000 sq m, and have retained the same parameters;2) The scale of demand both for entire site and part only;3) An assessment of both capital and rental values for the site again of the existing accommodation and having regard to any new development. <p>We have assumed for the purposes of this report that the buildings have not significantly changed since the date of our initial report and have therefore not carried out further inspections of them. If any significant changes have been made, this may impact on our advice.</p>
Surveyor	Ewan Dodds BSc FRICS.
The Property Address	EDME Site, High Street, Mistley, Essex CO11 1HG.
The Demise	<p>There are 2 components to the site:</p> <ol style="list-style-type: none">1) The main site south of High Street based on an old Maltings;2) A multi-storey warehouse north of High Street on Mistley Quay (known as Thorn Quay Warehouse). This warehouse has now had

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permission granted in June 2014 for the demolition of the existing warehouse and construction of a new building comprising 45 dwellings, quay level warehouse floorspace, office floorspace and car parking provision.

Our report will focus on the first of these two elements of the site, given that the latter already has planning permission for re-development.

2) Background

The Eastern Region benefits from a strong mainline rail and road network serving most of the major centres although there is only one motorway linking the northern M25 to Cambridge.

The Region also benefits from one of the country's leading airports at Stansted and two major East Coast Ports at Harwich and Felixstowe. Both are experiencing significant expansion. At Harwich, the 250 acre Bathside Bay area has received planning consent for four new deep sea berths but the owners, Hutchison Port Holdings, have received a five year build extension on the new container port development meaning that instead of a deadline of 2016, it has up until 2021 to start works. At Felixstowe, planning consent has been granted for a 1.4m sq ft logistics park.

The Harwich development is likely to involve major improvements to the A120 trunk road. The County town of Ipswich and Colchester are the major economic centres closest to the subject site, although Clacton with a population of 50,000 which rises significantly during the summer months is another substantial centre in the immediate vicinity.

Mistley is situated on the Essex / Suffolk borders close to Manningtree and on the banks of the River Stour. Colchester lies approximately nine miles to the south and Ipswich approximately twelve miles to the north via the A137. Mistley provides a local line rail service while Manningtree provides a mainline service on the Norwich to London Liverpool Street lines.

Within Manningtree there are a small number of shops including a Tesco Metro, Co-op Fiveways and other mainly local occupiers plus restaurants, banking facilities and some

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offices. Recently, Tesco withdrew from developing a major foodstore in the town and their site has been sold.

The established industrial estates are centred on Riverside Road East / West, South Strand etc. These estates offer a wide variety of essentially 1970's / 1980's detached, semi-detached and terraced industrial buildings with forecourt parking / loading facilities from around 1,000 sq ft (93 sq m). These are mostly of traditional steel and concrete frame construction beneath pitched roofs offering clear eave heights from around 15'0" (4.6m).

In Mistley itself, which is approximately half a mile to the east, there remains a small amount of industrial activity centred primarily on Mistley Quay and remaining Maltings activity. The village contains a modest number of public houses, primary schools and local shops.

The EDME Site

There are two components to the site:

- A) The main site south of High Street based on an old maltings and;
- B) The multi-storey warehouse north of High Street on Mistley Quay (Thorn Quay Warehouse). For the purposes of this report, this building is not being included.

The main multi-storey building is centrally located on the site and offers essentially open plan floors but with limited head room accessed via a central staircase. To the western boundary and along the road frontage are further former residential properties offering essentially cellular office accommodation while to the rear there are a variety of again older style and modern, bespoke warehouse properties some of which have been constructed to meet the needs of the existing occupier but in a way that limits car parking and servicing arrangements. To the eastern boundary there are a range of tanks which are shared with an adjoining occupier. Access to the site is via two principle points.

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The two former Maltings buildings directly opposite the station, overlooking the water have both been converted in recent times to residential accommodation.

3) Sub-Regional Market Factors & Demand

We have seen a considerable volatility in the property market since we previously reported. In 2007/2008 there was a virtual collapse in the banking system which affected the world economy. This resulted in record low interest rates of 0.5% and quantitative easing to help stabilise the UK economy.

There was a loss of confidence in the property market and, in particular, the commercial sector. It was not until 2013/2014 that the Government felt able to add stimulus to the economy by assisting first time buyers and promoted the banks to commence lending, particularly to help raise the property market.

This, together with foreign income, helped to stimulate the top London market which peaked in 2015. The commercial market followed and, in the last two years, we have seen a rapid rise in demand for freeholds and a corresponding increase in rents. What was lost during the period of recession had been largely regained.

However, the referendum in 2016 has caused the market to check and the outcome of leaving the EU is yet to be felt. The Bank of England very recently reduced rates still further to 0.25% and there has been further quantitative easing as well. These issues are leading to uncertainty and this will generate a lack of confidence. It is too early to predict as to how the commercial market will perform in the next 24 months but, this month alone the residential market is reported as having slowed down further. Brexit is reported as having slowed the residential sector considerably.

Turning to the sub-regional market, factors and demand, we would comment that we found, even during the period of growth, that rent levels in the more outlying areas did not move very significantly and, likewise, have not fallen heavily backwards at the time of the recession.

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In other words, they have maintained their very slow level of growth throughout. This basically reflects the lack of demand. The subject property, being obsolete in many ways, does not fit in to modern commercial requirements, not only in respect of space distribution but also with regard to sustainability and energy efficiency.

Industrial demand has improved in the Eastern Region over the past twenty years, notwithstanding a weakening following the crash around 2007/2008. This demand has remained predominantly for traditional industrial and warehouse style properties.

Many older style multi-storey buildings in other urban areas and particularly in dock locations are often unsuitable for the needs of modern industrialists. A number of these buildings have now been converted, usually to residential or sometimes to office uses or remain vacant often pending occupier or developer / investor demand. Examples are to be found immediately adjacent to the EDME site and elsewhere.

We have recently completed the sale of a multi-storey warehouse in Colchester's traditional Hythe area of the town which we refer to below. This is somewhat similar to the buildings at the Edme site. After some 15 months of marketing, a sale price of below £30psf was agreed, less than half the original marketing price. We would expect stronger demand in Colchester than in Mistley.

While the primary focus of our initial report was on the industrial sector, we also considered office demand. Demand however, in the locality remains very weak and remains very weak and centred largely on poor quality accommodation above shops.

Owner occupier demand has strengthened generally supported by further reduced interest rates and the attractive pension regulations. We continue to experience good levels of demand in most of the major towns in particular but also some of the smaller conurbations and some rural locations. There remains no identifiable demand though in Mistley. Again, we would still anticipate very modest take up rates again.

We are still of the opinion that if the whole site was reserved for employment purposes it would take up to 20 years to dispose of it. Given the development costs and the

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constraints upon development, the development of the site for employment purposes will not be viable. An analysis of this conclusion goes beyond our brief.

In the last 5 years we have seen some old office buildings converted to residential, with the benefit of Permitted Development rights. During the recession period, most of these old buildings remained empty or had been let on informal leases pending redevelopment.

We have also been dealing with another large, old industrial complex in Braintree, Essex and the history of this, which is still ongoing, provides a typical illustration. Comprising a range of old single storey steel portal framed buildings ranging up to circa 100,000 sq ft, and not meeting the needs of modern businesses, there were no further lettings. With a large proportion of the site vacant and with the prospect of the payment of empty rates, some of the redundant buildings were demolished. Short term lets under license ensued.

Formal leases on two of the buildings also came to an end in 2015. Pre-application discussions with Braintree District Council suggested that a mixed residential led use, with an element of employment use would be appropriate. The Local Authority accepted that retention of employment use would not be realistic, given the level of market demand. The local authority is now recommending the site for full residential development.

In general, the office market has been slow to pick up and whilst many older buildings which have become vacant have now been converted for residential purposes, there is still a reasonable supply of modern stock. Rent increases, however, have occurred but from a low base following the recession but speculative development, which is still very limited, is only taking place in areas i.e. regional cities and areas of large conurbations with good communications links.

4) Local Market

In Mistley, industrial activity is centred on the subject site and on the Quay.

In Manningtree there is an established industrial community comprising a range of essentially local / regional industrialists, predominantly in 1970's style industrial buildings ranging broadly from 1,000 sq ft upwards. We would estimate that the estate

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extends to some 200,000 sq ft and our research concludes that there are currently three nursery units available there of 1,250 sq ft, 1,500 sq ft and 2,500 sq ft available to let on this estate.

We are currently negotiating a site letting to a local business who is relocating from the estate, and are advised that they have agreed a private sale of their existing yard to an adjoining occupier. Additionally, on the corner of Riverside Way, Tesco have sold the site they obtained planning permission on for a new food store back to the original building company owner.

Since the recession hit, and particularly from 2012 when the market started to show signs of recovery, we have experienced a generally improved uptake of commercial space. The secondary retail sector remains most strongly affected.

We find in these more accessible and desirable locations that demand and supply work very closely together. There is currently one small retail unit on the market in non-estate locations and nothing else we can find locally. This demand is driven by local companies, many of whom are start-up and space required is mostly within the 1,000-5,000 sq ft range.

In December 2015, Whybrow sold an old three storey brick multi-storey warehouse located within the Hythe, Colchester which is designated as one of the town's main regeneration areas and has seen significant commercial and residential development over the past decade, mentioned earlier on page 8 of this report. The buildings were largely open plan but with some columns and a goods lift that served all floors. Adjoining the warehouse, and included in the sale, was the former Rising Sun public house. The total floor area of the warehouse was 25,875 sq ft with the public house an additional 2,400 sq ft.

It was placed on the market at £1.25m. Whilst there was some initial interest, it took time for it to be sold and a sale figure of £615,000 was achieved. The buyer plans a residential development but acquired the building unconditionally. In the locality, there

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has been significant residential development undertaken primarily by Weston Homes and Barratts, although this property is remote from much of this.

5) Analysis Of Demand For The EDME Site In Mistley

i. Existing Buildings

We have previously had the opportunity of inspecting the EDME site and buildings, but would stress that for the purposes of this report we have not been asked to reinspect the buildings.

The site forms a range of buildings comprising some less dated industrial units, the main No 2 Maltings fronting the road and other smaller and more traditional style buildings that have been developed on a piecemeal basis to suit the current occupiers.

This layout offers poor circulation routes around the buildings and limited loading / parking facilities. The main multi-storey No 2 Maltings building would also be regarded similarly in providing poor on-site car parking and extremely limited loading / unloading facilities and for these reasons, it would be considered wholly unsuitable for modern industrial and warehousing companies. In our opinion, it would be uneconomic to convert this for modern industrial purposes.

The property appears to lend itself most suitably for redevelopment while the disadvantages of the site rule against an industrial conversion. These disadvantages include current market conditions, its location, sloping site, limited access, parking and loading and configuration.

Having regard to current market conditions, interest in the buildings is likely to be negligible. The best solution would appear to be to redevelop the site for residential use which would complement the existing Maltings conversion immediately to the east.

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ii. EDME Main Site

This site is extremely fragmented and has been developed on a wholly piecemeal basis over the past century to provide a range of buildings of irregular layout in varying conditions. Two new warehouses have also been constructed specifically for the current occupier rather than in a way that would suit modern demand in terms of circulation, parking and loading facilities.

The remainder of the buildings on the site offer a variety of commercial accommodation, the majority of which would again be unsuitable for the needs of modern businesses in view of their age, layout, condition and servicing obligations.

The majority of the accommodation on the main site is either very old or has been constructed on a bespoke basis for the current occupier's manufacturing process. The main multi-storey building offers poor floor to ceiling heights, a poor layout and few amenities for separate occupation. We are advised that No 2 Maltings, the multi storey building on the main site, is also listed and this may render any conversion uneconomic and financially unviable. It would appear that its' future would possibly be best secured through a conversion to residential use.

Servicing to the site, by a range of goods vehicles and heavy goods vehicles in particular, is already unsatisfactory. This would be exacerbated if the individual buildings were let separately and this could lead to serious conflict. We have been advised that some servicing already takes place directly on the High Street, a factor which would be wholly unacceptable to potential occupiers and the local authority / Highways Agency.

The prospect of disposing of the site in its current configuration for occupation by an industrial user is remote as we consider it unsuited for the needs of modern business in terms of its' layout, eaves heights, specification, age, car parking, loading etc.

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The No 2 Maltings building has been marketed for an extensive period since 2006, without success. Initiatives included the erection of a signboard on the frontage, and local advertising. This had resulted in only two enquiries, one from a speculative developer reportedly on behalf of a client seeking some office accommodation and the other enquiry from Mistley Quay Forwarding in connection with their port operations.

There has been no more recent interest but for the reasons given above, would expect demand to be severely restricted, if not negligible. In our experience, a site and buildings such as these, together with this location, is only likely to generate residential developer interest.

iii. Demand in Tendring

Demand in the District as a whole is predominately from local industrial and warehousing / distribution companies, although the main centres of Harwich and Clacton attract limited, institutional demand.

There has been little industrial activity in the Tendring area generally and few reported transactions above 10,000 sq ft a 15,000 sq ft building was sold at auction on Gorse Lane, Clacton for around £30psf in 2014 and then let immediately to a major national company and another 14,000 sq ft building in Little Clacton was sold at around £150,000 a year earlier. In 2012, a 62,000 sq ft industrial building in Oxford Road, Clacton was sold to a private buyer.

We have marketed a range of new industrial units at Brunel Road, Clacton for Mantle Estates ranging from 1,000 sq ft to 14,000 sq ft and have let or sold these mostly to local as well as national businesses over the past five years. We are currently negotiating the sale of a 15 acre site on Gorse Lane to an owner occupier. The majority of sales locally have been of small units but one other maltings at Ardleigh, near Colchester extending

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to 13,000 sq ft was reported as being let by way of an institutional lease in 2015.

The industrial sector has evolved significantly and the move away from regional distribution hubs and their centralisation in strategic parts of the country has changed the local market significantly. Whereas historical demand often included industrial units of up to say 50,000 sq ft, the majority of demand we now experience is for smaller units ranging from 2,000 – 5,000 sq ft.

However, our larger conurbations still generate good quality institutional demand from major occupiers. Colchester has seen new industrial schemes offering units up to 35,000 sq ft which have been let to a variety of local, regional and national occupiers, although little speculative development is currently being pursued. Earlier this year we let a refurbished, prime building of 35,000 sq ft to DHL.

This demand is also from organisations already with existing representation rather than from new entrants to the area. There may be some potential to let a limited number of the EDME buildings individually but demand is poor and take up is likely to be very slow. Given the size and layout of these buildings, accommodation costs could be expensive and conversion or up-grading works may be unviable.

In our opinion we would not recommend that individual buildings are let on the site on a long-term or even short term basis or, to sell individual freeholds for a variety of reasons as follows:

- Although the better quality buildings, principally comprising the offices fronting High Street and the two newer warehouses adjoining the Green and rail station could attract tenant demand, there would clearly be an ongoing high level of voids which would pose serious management, maintenance and security problems;

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- The granting of longer-term leases or freehold sales would fragment the ownership and gravely undermine the scope for future redevelopment;
- If it is concluded the best way of preserving No 2 Maltings is via a residential conversion, all precautions should be taken to avoid conflict between industrial or warehousing activity and the reasonable amenities of future residents. This is likely to be impossible to achieve on such a constrained site;
- With virtually negligible interest anticipated, there is a real risk that the quality of potential tenants would be poor and the environment of the site will decline, ultimately with an adverse impact on future letting prospects.

iv. Demand for New Build B1, B2 and B8 Accommodation

We are advised that the main EDME site extends to just under 5 acres. Therefore assuming total demolition and redevelopment, the site may be capable in theory of accommodating up to 100,000 sq ft of new industrial buildings allowing for a plot ratio of 50% as we have reported before.

There are, however, some significant constraints to securing an acceptable form of redevelopment that will reduce the capacity of the site for employment purposes. These include:

- The marked changes in contours across the site should be allowed for;
- The need to retain the listed buildings;
- If a conversion to residential is considered for the listed building, there will be a need to provide for a quieter zone around the buildings as there will be greater potential for conflict;

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- As the property is within an area of high amenity value, strict standards of design may adversely affect the viability of the scheme and seriously curb business occupiers' activities.

We consider that there is unlikely to be demand for a single industrial or Class B complex of this size and in this location. Mistley is very remote from the main communications network with much of this travel through small villages and towns and a rural landscape. Access through Manningtree High Street for vehicular traffic is particularly restricted.

We are currently handling a major 30/50,000 sq ft industrial requirement from a major plc centred on Braintree to Sudbury where occupation is required by Q2 2017. We have also been dealing with a number of north Essex based requirements for modern space from national companies with current local representation from 10,000 sq ft to 20,000 sq ft, but a number of these have been concluded.

We have acquired a 25,000 sq ft warehouse in Colchester for Williams and Griffin and sold another modern warehouse of 17,000 sq ft to a local business on the same estate while another modern 13,000 sq ft warehouse at Easter Park in the town was let to Ransomes Engineering. We have also been monitoring a confidential 12 acre requirement in north Essex for Costco, but understand this may now have been shelved.

As major conurbations with a number of established industrial locations, the major industrial location nearby of Colchester, Ipswich and Clacton would be expected to attract a significant bulk of the ongoing industrial demand. In Mistley no such demand can be quantified apart from the restricted Port related activity already referred to before.

Mistley itself will not be regarded as an attractive location for industry because of inadequate road access for commercial vehicles. The environmental constraints of the Edme site in a village centre would deter



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most industrial or distribution companies. Equally, office occupiers will prefer to be in larger centres of population providing a reasonable supply and range of both modern and second-hand premises.

If the site was to be redeveloped for speculative letting, we would expect take up rates to be very poor for the same reasons as above. The Local Plan already provides for tranches of development land nearby in areas principally including Colchester & Ipswich, but also within Clacton, Harwich & Brightlingsea. These already offer far superior transport networks and labour supply, and a better supply of development land. We consider these locations will be far more attractive to occupiers.

I trust this report provides you with the relative market factors and demand you required. If you do require any further information, please do not hesitate to contact me or my PA, Coralie Douglas, in my absence.

Yours sincerely

Ewan Dodds BSc FRICS

ewan.dodds@whybrow.net

PA: coralie.douglas@whybrow.net

Appendix 5

Business case for relocation of Edme



**TENDRING LOCAL PLAN INQUIRY
2016**

**SUBMISSION TO THE INSPECTOR
BY
EDME LTD
HIGH STREET, MISTLEY, MANNINGTREE,
ESSEX CO11 1HG**

A Business Case

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Appendices

- I Site Plan 2016
- II Building Utilisation Levels
- III Photographs comparing the Edme operation with a typical modern food-processing plant.
- IV Bakery and food Ingredients manufactured at Edme.

5th September 2016

1 Introduction

1.1 Edme Ltd (Edme) is a food ingredients producer of 132 years' standing, starting in business in 1884. The operation at Mistley has evolved over the years from a basic maltings business to the innovative ingredients business that it is today.

1.2 Piecemeal development in a sloping site with old, often 19th Century buildings, now constrains development of the business in terms of meeting legislative changes, innovating new products and improving processing productivity. The adaptation of the existing buildings cannot readily be extended whilst meeting the new food standards. For example, the introduction of a Gluten-Free processing plant in 2015 cost almost double what it would have cost within a modern, linear factory site. Appendix III contains photographs

1.3 Transport is a key issue: vehicle movements for 29,000t of finished goods involves about 33,000t of raw material, some 1500 articulated HGV movements inwards annually. Despatches out are often in part loads, so total movements for goods for sale and by-product exceeds 2,500 movements each year. In addition Fork lift Truck movements up and down Mistley High Street take place throughout the day: the production lines are at the West end of the site, and the main finished goods warehouse is at the eastern end.

1.4 Capital expenditure has been substantial: £3.9m since 2010, with an additional £0.6m in vehicles. Since the parent company Anglia Maltings (Holdings) Limited (AMH) was acquired by the new owners in 2005, over £14m has been invested in Edme and in the acquisition of the Mistley Maltings, the main source of Edme materials.

1.5 Sales growth in the UK has been good over the last 4 years, with increasing exports. The business is currently producing about 29,000 tonnes per annum of sales product, and this is near the maximum that can be made on the site; thus pressures are being relieved by currently renting warehousing in Sudbury in order to clear space for manufacturing. Edme exports significantly, equal to 20-30% of sales; and employs 55 full time equivalents on the site with a total workforce, including drivers, of 85. The current site is neither suitable

either for investment in modern food manufacturing nor for the development of a skilled workforce able to continue in future the track record of innovation.

1.6 Edme processes flours and bakery mixes primarily for the Food Industry. Animal Pharmaceutical industry is also supplied. Activities include milling, flaking, mixing ingredients and then packaging in a variety of bag sizes for bakeries, for supermarkets with in-store bakeries, for other food manufacturers, and for petfood manufacturers. Examples of the products produced by Edme are shown at Appendix IV.

1.7 Food safety legislation has evolved rapidly, and placed considerable burdens on Edme, as various treatments to maintain food safety have been phased out. At the same time competitive pressure has caused the company to review the efficiency of its operation.

1.8 The Business Case put to the Inspector of the Local Plan Enquiry in 2007, following upon the change of ownership in August 2005, concluded that major investment in Edme would be necessary and such an investment would not be economic on the existing site for four reasons:-

1.8.1 The levels of the site did not permit straight-line automation.

1.8.2 The existence of heritage buildings in the middle of the site limited the scope for economic rebuilding, and made too expensive the construction of modern environmental controls, including air conditioning.

1.8.3 The maintenance of old buildings, increasingly unsuitable for food ingredient manufacture, increases the cost of contamination control to an uncompetitive level.

1.8.4 Modern office accommodation could not be created whilst retaining the existing four houses used as offices: Planners are keen to keep these as part of a street-scene.

These four points remain as pertinent today as nine years ago. As a result, investment in plant of over £5m has focused on food safety and on installing equipment which can be readily moved to a new site, if good economic value can be obtained for the existing Mistley High Street site. Indeed the Inspector's Report recognized these issues.

1.9 Having taken the decision that the existing site could not be economically re-developed, the Company has acted:-

1.9.1 To maximise the development value of the existing site in order to create funding for relocation. Thus the Thorn Quay Warehouse has received planning permission for 45 residential units. Section 73 amendments are now before the Tendring District Council arising from a combination of legal challenge and the submission for a Village Green

1.9.2 To seek an alternative site along an arc along the A12 and A14 from Chelmsford to Bury St Edmunds, with a strong preference for remaining within the Tendring District. Discussions are currently in progress.

1.10 Edme operates within a competitive market – net margins are under 10%. Growth and employment prospects are dependent on both introducing new products for the bakery trades and in devising ever more economical means of converting basic raw materials into high value foodstuffs.

1.11 Edme has positive trading prospects as a result of its creative new product design, and of its wide distribution in the UK, Europe and the Middle East. It can best realise these prospects by achieving maximum value from the re-development of the site. Such a redevelopment needs to address the fundamental unsuitability of the site for 21st Century industrial activity.

1.12 Development activity over the last decade has been slow due to the legal challenges mounted by the neighbouring port operator, the introduction of the Village Green, and the sensitive nature of the proposed re-developments.

2 Summary: ten points

2.1 Total building area is 13,251m²

2.2 Current industrial and office occupation is 7,179m², for which utilisation is just 45%, excluding the thorn quay Warehouse.

- 2.3 Meeting new Food Safety and Health and Safety legislation is increasingly expensive and difficult.
- 2.4 Basic repair and maintenance costs are up to £200,000 per annum.
- 2.5 No major energy saving investment is possible.
- 2.6 Current investment can only be on moveable plant and equipment due to the short future time span of operation on the existing site.
- 2.7 Edme will move its current operations to a new site as soon as practical.
- 2.8 The 'practical' is significantly influenced by the value released for reinvestment.
- 2.9 The markets which Edme serves are growing. They are international - 20-30% of sales are exported. They are ones where Edme's innovation has added value, growth and employment.
- 2.10 Production, mainly driven by strong growth in UK markets is limited to 29-30,000 tonnes per annum without significant investment; currently sales are at 29,000t.

3. Market Developments

3.1 Primary Market

Edme's market sector is primarily the bakery industry. This market is changing rapidly. In the aftermath of the collapse of the Atkin's Diet there is increasing consumer interest in complex carbohydrates, seeds and grain textures as major components of the diet. These changes are all in the course of business: Edme has evolved from being a maltster, then a malt extract works for the drinks trade, to being a processor of dry goods for the food industry. This evolution has also meant that stricter standards of hygiene have to be met. Edme's tonnage has increased over the last 4 years both as a result of market share gains, but also as a result of higher demand for sandwich bread and wraps.

3.2 Healthier food

- 3.2.1 Consumers are aware of the health benefits of the sugars in malted products, in the low glycyemic index values of the kind of products made by Edme,

and in the taste and texture of unconverted natural grains and seeds within dough mixes.

3.2.2 A Gluten-Free plant was installed in 2015.

3.3 Milling innovation

Surprisingly flour milling technology is still making significant innovations, and bakery customers look to Edme to complement these with interesting and healthy flour, malt and seed mixtures.

3.4 Expansion

Volume growth so far in 2016 is +15% year; growth is expected to continue.

3.5 Growth accelerated by innovation

Edme devised in 2015 a patented new conversion process for grains and anticipates further substantial growth for 2017. Within the useable area of the site there is very limited opportunity for the economical installation of new processes. Our experience of installing a Gluten-free plant in 2015 was that it was very expensive.

4 Food Safety

4.1 The Food Safety Act 1990 and subsequent legislation and Statutory Instruments have increased the pressure on Edme to modernise its ill-laid out premises.

4.2 Edme operates to British Retail Consortium Grade A standard (BRC). Audits are annual for this standard. Individual customers audit on a regular basis both before starting to trade with Edme, and during contracts.

4.3 BRC standards are ratcheted upwards each year, creating an annual challenge in order to meet new standards.

4.4 The cost of conversion to meet new legislation is increased by the inefficient occupation of the site, at only 31% of total built area. Investment is therefore dissipated in unutilised areas.

4.5 The decision to relocate is profoundly influenced by the tighter regulation of the Food Industry. It is increasingly expensive to meet each new requirement.

4.6 Operational costs are increased by the policy of isolating individual production lines such that Operators and Supervisors moving from one part of the site need to change workwear before entering each production unit.

4.7 Control of pests

In addition, prior methods of controlling pests, previously addressed by fumigation, are now inoperably restrictive due to changes to EU legislation. In buildings constructed in the C19th some requirements may not be met, and the manufacturing process given up.

5 Health and Safety and other legislation

5.1 Fork lift Trucks

In order to maintain manufacturing on the site Edme must use all available flat space that can be accessed by fork lift truck. Part of the warehousing is accessed using the High Street, and is manifestly more costly and inconvenient.

5.2 Vehicle movements

Edme processes c. 33,000 tonnes each year in order to create 29,000t of sales product, with product mainly arriving in bulk trailers and leaving in flat bed curtain-sides. Total vehicle movements exceed 4,000 per annum, c. 15 per day, excluding cars. Most vehicles need to reverse into the High Street after loading to leave. In addition there are many forklift truck movements across the High Street. This activity is in a residential area. Planning permission has been obtained to demolish the old boiler house at the foot of the Edme Chimney, and to create an internal roadway. However this is of no economic benefit.

5.3 Meeting new legislative requirements

5.3.1 Edme operates on a continuous 24 hour, 7 day basis. There are vehicle movements at all times, particularly as movements to the ports of Harwich and Felixstowe are stringently timed.

5.3.2 The Company also operates maintains a Haulier's O Licence. As the area has now become primarily residential, following the conversion of the maltings on the north side of Mistley High Street, it is increasingly likely that restrictions on vehicle movements will be reflected in the O Licence.

5.3.3 Further, the frequent movement of the fork lift trucks along the High Street whilst currently legal, is likely to be a source of contention on both Health and Safety grounds, and a potential noise nuisance to the nearby residents.

6 Site Development over 120 years, changes of use, redundant buildings

6.1 The site has been developed since the mid C19th, and indeed relics of the old goods yard are still visible. Additional production units were constructed throughout the early C20th. Houses have been converted into offices.

6.2 Constraints on Development

6.2.1 Labour costs have increased as a result of increased production. However improvements in efficiency have been hard to achieve as there is a requirement for access by forklift trucks and for high bay storage. As a consequence there has been a retreat to those parts of the site which are:

- Level
- Can be developed economically.

6.2.2 In 1998, after a fire, the malting process could not be restored on the site as configured, and operations were moved off site in 1998.

6.2.3 It should be noted that the site clearance can only be done with planning consent as the site is within a Conservation Area. Recently a request to demolish the chimney stack was deferred at the request of the Local Authority who asked for such demolition to be accompanied by a comprehensive plan for the redevelopment of the site.

6.2.4 Listed buildings: in addition to the constraints of the site and the impact of operating in a Conservation Area, the site contains a number of buildings

which English Heritage wishes to see preserved so that an appropriate “street-scene” can be maintained along Mistley High Street. This prevents redevelopment. No economic commercial use has been found for No.2 Maltings, and the Whybrows report refers to the lack of such demand.

6.2.5 Footpath: a further constraint is the Essex Way footpath. This bisects the site, and prevents comprehensive industrial redevelopment.

6.3 List of buildings

The table below lists the various buildings, see Appendix I for their locations.

	Unit No	Sq M	Sq FT	Utilization %	Used
1	Distribution Warehouse	534	5,747	100	5,747
2	Workshop, 4 storey	1,018	10,957	15	1,643
3	Store	84	904	80	723
4	Laboratory	270	2,906	75	2,180
5	Garage	280	3,013	50	1,507
6	Warehouse & Production	1,252	13,498	25	3,375
7	Old Maltings No.2	2,860	30,785	40	12,314
8	Offices, net internal area	134	1,442	30	433
9	Offices	138	1,485	35	520
10	Head office	145	1,561	100	1,546
11	New Warehouse	462	4,973	100	4,973
s/t	South side of High Street	7,179	77,271	45.2%	34,961
12	Thorn Quay, subject to planning	6,072	65,362	0	0
Total		13,251	142,633		34,961

Note: the offices are currently spread over four converted C19th and early C20th domestic dwellings that do not allow for progressive communication and efficiency.

7 Buildings in use

7.1 The business has eight main activities:

7.1.1 Flaking

7.1.2 Mixing

- 7.1.3 Milling
- 7.1.4 Kibbling
- 7.1.5 Gluten-free Manufactures
- 7.1.6 Packaging
- 7.1.7 Warehousing and Storage: Goods intake, Goods in process, Completed goods for sale.
- 7.1.8 Sales and marketing: these departments occupy 34,961 square feet in converted domestic accommodation.

The operation thus occupies just 24.5% of the total built space, including Thorn Quay Warehouse.

7.2 Developments and investments

The owners of Edme have invested substantially over the last 10 years:

- 7.2.1 in a new mill: £100,000
- 7.2.2 liquid extract packaging: £325,000
- 7.2.3 Gluten-free processing line: £453,000
- 7.2.4 Bulk Mixing line: £985,000
- 7.2.5 Barley Pearling: £152,000
- 7.2.6 General up-grading.
- 7.2.7 Further investment is planned in order to process oats, a bulky product, with planning permission obtained to demolish the old Boiler House, and to construct a general processing building

7.3 Automation

- 7.3.1 Whilst it has been possible to automate certain processes, with others it has been uneconomic. For example, the recent installation of a robotic arm has not been successful due to site constraints. The investment was written off.
- 7.3.2 Plans to install a high-speed bagging line have been shelved as the investment is not economic on this site.

8 Business expansion and employment opportunity

8.1 Employment

8.1.1 Edme employs 55 full time equivalent staff on site.

8.1.2 Business expansion has been good: tonnages are up 15% year to date in 2016, and new product development opportunities are excellent.

8.2 Competitive position

8.2.1 The recent investment has improved efficiency and the Company's competitive position. New business has been won.

8.2.2 Further automation would add process efficiency and reduced cost to the list of competitive advantages of Edme. This list is currently headed by skills in innovation and new product development. Thus the business has an optimistic view of its future and has plans to relocate to modern premises as soon as practical.

9 Industry Growth prospects

9.1 UK growth

Whilst sales of bakery products UK volumes are static or falling - the compound decline over the last decade has been 1.5% pa, sales of malted products are up 26%. Consumer interest in more complex carbohydrates is driving up national demand for the mixes and grains in which Edme specialises. Sandwiches and wraps are the main growth areas; this is replicated in export markets.

9.2 Export growth

20-30% of Edme's production is exported, depending on the exchange rate. Edme takes exhibition space at the Food Ingredients Exhibition which takes place every 2 years; from these it is clear that trade interest is in foods which have natural texture, mouth feel and fresh taste. UK bread baking and the range offered in supermarkets now leads the way, with copied operations in Saudi Arabia and the Gulf States, both destinations for Edme products.

9.3 Long term prospects

- 9.3.1** Fifteen years ago Supermarkets sold bread as a loss-leader; profit margins were negligible. Now interest in complex breads is expanding. This is attractively profitable for retailers and bakers alike, and is characterised by dynamic new product launches with higher level of non-wheat inclusion in the recipes, if not actually Gluten-Free.
- 9.3.2** Edme supplies all main UK bakers, and sees a good future led by innovation. However, these prospects are difficult to realise on the present archaic site with its poor building utilisation, with buildings which cannot be modernised. Appendix II shows the poor utilisation levels of the buildings.
- 9.3.3** For Edme, the case for relocation has been made, if the Company wishes to develop further its export business, then new premises are necessary.

10 Company Future

- 10.1** Since it was decided that the site could not be economically redeveloped the Company has instigated a search for an alternative site. This was started with the Investment Officer at Tendring Council in April 2006. Two sites have now become available within Tendring District, and Edme is in discussion as far as both are concerned, and will start discussion with the recently permissioned site at Lawford.
- 10.2** The Company has identified the areas within which it is prepared to consider relocation, and sites must provide an economic delivery-point for home trade comprising 70% of business, and within reach of the eastern ports for up to the 30% of business that is exported.
- 10.3** The Company needs to retain its skill base.
- 10.4** Maximisation of the site value increases the options for the Company including freehold site purchase and future investment in plant and equipment.

**Appendix II
Business Case
Utilisation Levels**

No	Building Description	sq m	sq ft	Utilisation %	Used (sq ft)
1	Distribution Warehouse	534	5,747	100	5,747
2	Workshop, 4 storey	1,018	10,957	15	1,643
3	Store	84	904	80	723
4	Laboratory	270	2,906	75	2,180
5	Garage	280	3,013	50	1,507
6	Warehouse & Production	1,252	13,498	25	3,375
7	Old Maltings No.2	2,860	30,785	40	12,314
8	Offices, net internal area	134	1,442	30	433
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11	New Warehouse	462	4,973	100	4,973
s/t	South side of High Street	7,179	77,271	45.2%	34,961
12	Thorn Quay	6,072	65,362	0	0
Total		13,251	142,633		34,961

Business Case Appendix III

Existing Edme site buildings compared with a case study modern production plant

Photographs 1 & 2



Existing Edme Buildings – Converted Victorian building not meeting customer expectations.



Modern Production Buildings - Purpose built building meeting customer expectations.

Photographs 3 & 4



Victorian building, low ceilings, lots of ledges, costly and difficult to clean, lights hang from ceiling.



Easy clean walls, no ledges, sealed floor; lights and services access from service area above production.

Photographs 5 & 6



No sprinklers due to low ceilings and construction, many ledges and poor utilisation of spaces.



Due to the nature of the building, sprinkler fitted and serviced from above while keeping ledges to a minimum

Photographs 7 & 8



Transfer below production area cannot be carried out without leaving production buildings.



Built in service corridor allow hygienic access to all areas without leaving production building.

Business Case, Appendix IV
Bakery and food Ingredients manufactured at Edme

Premium Malted Mix

- Blend of Malted Wheat Flakes & Kibbled Malted Wheat



Ancient Grain Mix

- Wholegrain Spelt, Millet Seed, Wholemeal Barley Flour and dried malt extracts



Spelt, Soya & Sunflower

- Kibble spelt, kibbled soya and sunflower seeds

Aromatic Dark Rye

- Kibbled Toasted wholegrain Rye with roasted malts



Golden Flax Concentrate

- Yellow flax seed for high Omega 3 content



Brackley Mix

- Malted Grain & Seed blend



Stickimalt Mix

- Traditional sticky fruit malt loaf made with British barley malt

Tomato Bread Concentrate

- A concentrate of sun dried tomatoes and red pepper powder with basil, oregano and rosemary



Gluten Free Seedy Bread Mix

- A complete mix for the production of
Gluten Free bread



Gluten Free Maize Flour

- Used in coatings for Chicken and Fish



Wholesoft Grains
- Rye and Spelt grains

Wholesoft Sprouted Grains
- Sprouted rye & barley



Appendix 6

**Copy of transportation advice from Peter Evans Partnership
Sustainability Appraisal of alternative options for the Edme site**

21 Richmond Hill, Clifton,
Bristol, BS8 1BA
Tel 0117 973 4355
Fax 0117 973 2793
email mail@pep-bristol.co.uk
www.pep-bristol.co.uk

**Peter Evans
Partnership**

Transport Planning and
Traffic Engineering Consultants

Tendring Local Plan Consultation EDME Site, Mistley

Anglia Maltings (Holdings) Limited

Transport Statement

August 2016

Peter Evans Partnership Limited

Directors: Andrew J Kenyon BEng FCIHT **Hilary R Vaughan** BEng CEng MICE FCIHT **Mark E Callaghan** MCIHT

Associate: Helen M Stephens BSc MCIHT

Consultant: Peter L Evans BEng MSc CEng MICE MCILT FCIHT

Registered in England and Wales No.4373557 Reg Office: 8 Unity Street, College Green, Bristol BS1 5HH

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- Appendix 7 Proposed Traffic TRICS Outputs
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- Appendix 8 Proposed Traffic Generation Calculations

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1.0 INTRODUCTION

1.1 Background

1.1.1 The EDME malting's site is in the northern part of Mistley, and is part of the Anglia Maltings organisation.

1.1.2 Tendring District Council are currently in the process of developing a new Local Plan. The Tendring District Local Plan 2013-2033 and Beyond, Preferred Options Consultation document was published in July 21016. This draft Local Plan does not identify the EDME site as an allocation site on the proposals map for either employment or mixed uses. However the text of the Consultation document reference is made to safeguarding the site for employment use.

1.1.3 This Transport Statement accompanies a response to the Local Plan consultation by Anglia Maltings promoting the allocation of the site for a mixed use residential led development. The existing coverage of employment use on the site is greater than required by EDME for current operations or future plans.

1.1.4 In 2006 representations were put forward by Anglia Maltings as part of the inquiry for the Adopted Tendring District Local Plan, with the aim of identifying the EDME site for mixed use development. The Adopted Local Plan 2007 notes at paragraph 12.12a that a mixed residential, employment and leisure use scheme would be appropriate for the site. This Local Plan continues to remain adopted policy.

1.1.5 The report considers the suitability of the site for the proposed uses from a transport perspective, including accessibility by non-car means, noting the nearby main line railway station, and to local facilities. The effect of the proposals in terms of traffic in comparison with existing movements is also considered.

1.2 Contents

1.2.1 The Statement continues:

- in Section 2 with a description of the transport context of the site including location, accessibility and road safety record;
- in Section 3 identifying the relevant transport planning policy;
- in Section 4 with a description of the proposed uses and associated traffic forecast;
- in Section 5 with our appraisal of the proposals in transport terms; and
- in Section 6 with a summary of our conclusions.

2.0 PLANNING POLICY AND GUIDANCE

2.1 National Planning Policy

2.1.1 In terms of transport, the National Planning Policy Framework (NPPF) states that planning should '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.'

2.1.2 The NPPF states specifically in Section 4 that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe (para 32).

2.1.3 Developments should also:

- *'accommodate the efficient delivery of goods and supplies;*
- *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians; and*
- *consider the needs of people with disabilities by all modes of transport (para 35).'*

2.2 Development Plan

Adopted Tendring District Local Plan

2.2.1 The Tendring Local Plan was adopted in December 2007. The policies within the document remain 'saved' until the emerging Local Plan is adopted. The Local Plan is based on a vision which aims to strengthen the economy and promote regeneration, and improve the quality and choice of transport (para 1/40a).

2.2.2 Paragraph 12.12a notes that a mixed residential, employment and leisure use scheme would be appropriate for the EDME site. Therefore the site has already been accepted for mixed use development.

2.2.3 Policy TR1a requires safe access to development to be provided for all road users. This includes appropriate facilities for pedestrians and cyclists as identified in policies TR3a and TR5.

Draft Replacement Tendring District Local Plan

2.2.4 The Tendring District Local Plan 2013-2033 and Beyond - Preferred Options Consultation was published in July 21016. Mistley is identified as a 'smaller urban settlement' in the draft Local Plan.

- 2.2.5 The proposals map for Mistley identifies the Quayside as an employment site. None of the EDME site is included in this designation. However draft Policy PP6 – Employment Sites indicates that ‘the Council will seek to protect existing employment sites, as set out in the Council’s current Employment Land Review.’ The latest Employment Land Review, by Aspinall Verdi, was published in May 2016. This review lists EDME Maltings as an employment site and notes:

‘Whilst occupied by employment use, older buildings which have heritage value may not find suitable re-use for employment purposes, primarily for viability reasons. Recommendation: to retain the employment use designation, however to work with the owners to secure the future re-use of the heritage buildings as part of the wider development brief.’

- 2.2.6 Draft Policy CP1 – Sustainable Transport and Accessibility notes ‘proposals for new development must be sustainable in terms of transport and accessibility.’ The design and location of the development should allow for access by foot, cycle and public transport.

2.3 CIHT and DfT Guidance

- 2.3.1 The Chartered Institute of Highways and Transportation (CIHT) published ‘Guidelines for Providing for Journeys on Foot’ in 2000. This document indicates that the average length of a walking journey is 1 km. The report also provides advice on acceptable walking distances to various facilities.

- 2.3.2 The suggested distances are provided in Table 3.2 of the document as set out below:

	Suggested Acceptable Walking Distance (metres)		
	Town centres	Commuting/School	Elsewhere
Desirable	200	500	400
Acceptable	400	1000	800
Preferred Maximum	800	2000	1200

- 2.3.3 The CIHT ‘Guidelines for Planning for Public Transport in Developments’ published in 1999 indicates that the maximum walking distance to bus stops from a development should be no more than 400m. However the guidance also notes that having direct and simple bus routes is more important than walking a little more than 400m.

- 2.3.4 The Department for Transport Local Transport Note 2/08 – Cycle Infrastructure Design gives guidance on principles and practice for the design of cycle infrastructure. The note considers typical distances for cycling trips and notes that, for commuter journeys, a trip distance of over five miles (8 km) is not uncommon (Section 1.5).

3.0 TRANSPORT CONTEXT

3.1 Strategic Location

- 3.1.1 Mistley is on the south side of the River Stour estuary and forms part of the urban area comprising the town of Lawford, Manningtree and Mistley as shown in Appendix 1. Colchester and Ipswich are about 17km to the south west and north respectively.
- 3.1.2 Mistley is on the main railway line from London and Colchester to Harwich. Mistley Station is close to the site.
- 3.1.3 The main strategic roads in the area are the A120 about 5 km to the south between Colchester and Harwich and the A12 trunk road between Colchester and Ipswich about 6km to the north west. An alternative route between Colchester and Harwich of a lower standard, the A317, passes to the immediate west of Manningtree and Lawford. Harwich is about 14 km to the east.
- 3.1.4 The B1352 passes through Mistley and links Manningtree to the west with Harwich to the east. On the western fringe of Mistley, the B1352 High Street meets the B1035 which provides a direct route to the A120 to the south.

3.2 Local area

- 3.2.1 Mistley comprises two main parts divided by the railway line. The EDME site is in the northern part of Mistley as shown in Appendix 2. As well as the existing EDME operations, the area includes residential uses, Mistley Quay and Mistley railway station. Former Quayside buildings to the north east have recently been converted to residential use.
- 3.2.2 The southern part of Mistley known as New Mistley lies south of the railway line and comprises mainly residential uses, with some employment use. Former warehouse buildings to the south of the railway line have also been converted to residential in the last five years.
- 3.2.3 Past the site the B1352 is known as High Street. About 200m west of the site, High Street meets the B1035 at a priority junction known as the Twin Towers junction. The B1035 is the side arm, with the approach and leaving lanes separated by a central island. High Street through the northern area of Mistley gives access to the Quayside via two routes as shown on Appendix 2. Immediately east of the site is the access to the railway station.

3.3 Existing Site Use and Permissions

- 3.3.1 The site comprises two parcels of land, one either side of High Street.
- 3.3.2 Vehicular access to the northern parcel is via the Swan Basin. A total of five access points are provided from High Street to the southern parcel.
- 3.3.3 The southern parcel of the site is used by EDME. The existing buildings have a combined gross floor area of around 13,250sqm. However EDME have identified that only around 9,300sqm is suitable for employment use.
- 3.3.4 Heavy goods vehicles frequent the EDME site during the day. It is understood that some of these vehicles currently have to reverse off the EDME site on to High Street due to access limitations around the site. The site also uses a number of forklift trucks to transport goods around the site. Currently forklift truck make use of High Street to travel between different buildings in the site.
- 3.3.5 Planning permission for the conversion and extension of The Abbey building on the western side of the southern parcel, adjacent to High Street, for three houses, and the development of a further three houses adjacent to the building was granted in 2011. This permission lapsed and permission to renew this scheme was granted in December 2015, application reference 15/01634/FUL.
- 3.3.6 The northern parcel of the EDME site accommodates the Thorn Quay warehouse. The warehouse is no longer used as part of the EDME operations as is on the opposite side of the road to the main works. In June 2014 planning permission was granted for the redevelopment of the Thorn Quay warehouse for 45 dwellings plus a small office and warehouse, application reference 12/00427/FUL.
- 3.3.7 In general the site as a whole is currently underutilised by EDME as a result of the buildings provided, some of which are listed, and nature of the current business requirements. EDME have indicated that there are a number of constraints with the existing buildings relating to food safety regulations which mean that parts of the site are no longer suitable for the EDME operations.

Existing and Permitted Traffic Generation

- 3.3.8 The permitted development at the EDME site comprises the EDME operations plus residential development at the Thorn Quay warehouse and The Abbey.
- 3.3.9 Traffic surveys undertaken at the EDME site in 2011, as part of the New Warehouse planning application provide details of the typical traffic generation of the site in its current form. These surveys recorded a total of 21 vehicle movements to/from the site in the morning peak hour and 27 in the evening peak hour.

- 3.3.10 Traffic assessment for the permitted Thorn Quay and The Abbey developments have confirmed that a further 20 vehicles two-way could be generated by these permitted uses at the EDME site. Therefore the total permitted traffic generation of the EDME site as a whole is 41 vehicles two-way in the morning peak hour and 47 in the evening peak hour.
- 3.3.11 Further details of the permitted traffic generation are set out at Appendix 3.

Potential Traffic Generation

- 3.3.12 The EDME site is currently not fully operational and therefore a review of the potential traffic generation of an employment use on the southern part of the site has been undertaken using the TRICS national database.
- 3.3.13 In the 2006 Local Plan review the local authority suggested that the site should be safeguarded for employment. At the time it was identified that if the site was redeveloped for employment it was estimated that a similar floor area could be accommodated on the site, as per the existing use, around 9,300sqm. Around 25% of the site was assumed to accommodate B1 offices and 75% B1c/B2 Light Industrial/Industrial use.
- 3.3.14 Based on the TRICS review the potential employment development at the site could generate 109 vehicle movements two-way in the morning peak hour and 78 in the evening peak hour.
- 3.3.15 Further details of the TRICS outputs and traffic generation calculations are set out at Appendices 3 and 4.

3.4 Local Facilities

Education

- 3.4.1 Mistley Norman Church of England Primary School is some 1.1km to the south east of the site.
- 3.4.2 The nearest secondary school is in Manningtree High School some 2.3km to the south west.

Shops and Services

- 3.4.3 Mistley Post Office is immediately to the west of the site on High Street. The Mistley Thorn Restaurant is adjacent to the Post Office. To the north of Swan Basin is The Tea House at Mistley Quay.
- 3.4.4 To the east some 400m is the Mistley Fisheries fish and chip shop and the Anchor Inn public house. South east, some 850m from the site a convenience store is also provided.

3.4.5 Manningtree High Street is some 1.2km to 1.5km to the west with further shops and services provided including a banks, convenience stores, and a chemist. A Co-op supermarket is also provided some 1.6km from the site.

3.4.6 Two doctors' surgeries are provided in Maningtree, the nearest being the Riverside Health Centre some 1.6km west of the site. A dentist is also provided on Maningtree High Street.

3.5 Footways and Cycleways

3.5.1 Most roads in Mistley have footways on one or both sides. Adjacent to the site footways are provided on both sides of the High Street.

3.5.2 Pedestrians walk along the Quayside to the north of the site however no public right of way is in place. An application for the Quayside to be allocated as a village green was granted in 2014, allowing public access to the land directly north of the site. This has been challenged and therefore the matter is ongoing. It remains that no formal public right of way is in place on the Quayside.

3.5.3 The route of the Essex Way, a long distance footpath route passes the site. To the south the route continues through the EDME site and across the train line, via a footbridge, and to the west the route follows the High Street and The Walls to Manningtree.

3.5.4 There are no dedicated cycle facilities in Mistley, with cyclists using roads.

3.6 Public Transport

Bus Services

3.6.1 Local bus services continue to stop outside the Post Office on High Street immediately west of the site.

3.6.2 The following regular bus services are provided from the Post Office:

Services on High Street		Service Frequency (minutes)					
Service	Route	Mon - Fri		Saturday		Sunday	
		Day	Eve	Day	Eve	Day	Eve
2	Clacton-on-Sea - Mistley	120	-	120	-	-	-
102/103/ 104	Harwich – Colchester	30	120	30	120	120	120
803	Harwich - Witham	1-2 per day		1 per day		-	

Train Services

- 3.6.3 Mistley train station is immediately east of the site. Local Manningtree to Harwich services operate during the day with an hourly frequency and twice hourly during peak times. These local services connect to mainline routes at Manningtree with trains to London, Colchester and Ipswich.
- 3.6.4 The station is also served by two Harwich to London services in the morning peak hour and one return service in the evening.

3.7 Safety Record

- 3.7.1 Personal injury accident records have been obtained from the Crashmap accident data website for the five year period between 1st January 2011 and 31st December 2015 inclusive. The data covers the High Street in Mistley from the Mistley Towers junction to the west and the station to the east. A plan of the accident locations is provided at Appendix 5.
- 3.7.2 No personal injury accidents have been recorded along the site frontage in the five year period under review.
- 3.7.3 Two slight accidents were recorded at the Mistley Towers junction to the west and two slight accidents along High Street between the site and Towers junction. None of the accidents involved heavy goods vehicles nor pedestrians or cyclists. All four accidents involved vehicles turning and hitting oncoming vehicles.

4.0 EDME SITE PROPOSALS

4.1 Land Uses

4.1.1 An indicative site layout has been prepared for the site to determine the potential future uses able to be accommodated on the land. The indicative layout includes:

- 53 houses (including 6 at The Abbey, 4 at Thorn Quay and the remainder on the rest of the main site);
- 73 apartments (including 41 at Thorn Quay and 32 in No. 2 The Maltings which is part of the main EDME site);
- 208sqm offices (including 58sqm at Thorn Quay and 150sqm retained as part of EDME site); and
- 1134sqm warehousing (including 420sqm, at Thorn Quay, and 714sqm retained as part of EDME site).

4.1.2 The proposed residential units, over and above those already permitted, are to the west and centre of the main site to the south of High Street. The retained EDME site area would be in the eastern part of the site.

4.1.3 The indicative site layout is shown at Appendix 6.

4.2 Site Access

Vehicle Access

4.2.1 Permission has been granted for vehicles to the Thorn Quay residential building to gain access via Swan Basin to the west, via High Street.

4.2.2 The southern part of the site would be served by a new loop road off High Street which would then serve the individual buildings. This loop road would make use of two of the existing access points to the site, however the junctions would be redesigned as part of the scheme. The junctions would be designed in keeping with the character of High Street and in accordance with Manual for Streets principles. Some buildings fronting High Street may also have direct frontage access.

4.2.3 The existing eastern EDME vehicular access would also remain to serve the retained EDME warehouse, offices, and associated car parking.

Pedestrian Access

4.2.4 Pedestrian access to the site would be via footways either side of the vehicle access points. Footways within the development would connect to the existing provision along High Street.

4.2.5 The existing public right of way through the site would be incorporated in to the design of the scheme, with a crossing point across the loop road provided.

4.3 Traffic Generation

4.3.1 A review of the TRICS National Database version 7.3.2 has been undertaken to determine the likely traffic generation of the proposed mixed use development. Sites in England (excluding London), Wales and Scotland in the following categories were reviewed:

- Private Houses;
- Private Flats;
- Offices;
- Warehouse.

4.3.2 The TRICS database doesn't contain many sites comparable to Mistley. However for the purposes of the review further detailed search criteria were selected with the aim to use the most comparable sites available. The TRICS database outputs used in the review are provided at Appendix 7, with details of the traffic generation calculations set out at Appendix 8.

4.3.3 The total proposed traffic generation of the mixed use residential and employment scheme would be as follows:

	Proposed Vehicle Trips		
	Arrivals	Departures	Two-way
Morning Peak Hour	21	34	55
Evening Peak Hour	36	26	62

5.0 TRANSPORT APPRAISAL

5.1 Approach

5.1.1 Our appraisal of the proposed development assesses:

- accessibility by means of transport other than the car;
- traffic generation comparison;
- road safety review; and
- throughout each section the consistency with policy.

5.2 Accessibility by Non-Car Means

Walking and Cycling

5.2.1 Mistley is relatively compact with the primary school within the preferred maximum walk distance as set out by the CIHT. The Post Office is also within acceptable walk distance and the convenience store only marginally outside the preferred maximum walk distance to town centre retail. The proximity of the site to local facilities encourages access to these on foot.

5.2.2 Manningtree High Street with a range of shops and services available is around a 15-17 minute walk from the site, which is within the preferred maximum walk distance for commuting set out by the CIHT and only marginally in excess of the walk guidance to other facilities. The proximity of Manningtree therefore also encourages journeys on foot from the site.

5.2.3 The whole of Mistley and Manningtree, plus other local villages including Brantham and East Bergholt are within an 8km cycle of the site enabling future residents or employees to travel to/from the site by cycle.

5.2.4 The indicative design indicates that suitable pedestrian and cycle access can be provided. The design would also enhance the existing public right of way. Therefore the design would be in line with local and national policy on accessibility by foot and cycle.

Public Transport

5.2.5 A main feature of the site is the proximity to Mistley train station with direct services to Colchester, Harwich and London. Bus services with a 30 minute frequency also stop adjacent to the site. Future residents and occupiers would benefit from the proximity of Mistley train station and regular bus services provided on High Street. Therefore public transport enhancements are not considered necessary.

5.2.6 National policy indicates that developments should have access to 'high quality public transport facilities'. The proximity to of the train station and bus stops means that the EDME site meets policy requirements.

Conclusions on Non-Car Accessibility

- 5.2.7 The national and local policy approach to sustainable development is to ensure new development is accessible to local facilities by alternative means to the private car. The site is accessible to local facilities using alternative modes of transport in line with policy.

5.3 Traffic Generation Comparison

- 5.3.1 The historic EDME traffic data has indicated that in the peak hours around 21 vehicles two-way would be generated by the site in the morning peak hour and 27 in the evening peak. However with the Thorn Quay and The Abbey residential developments also permitted in areas of the site with limited use, the overall permitted development could generate around 41-47 two-way trips in the morning and evening peak hours.

- 5.3.2 The mixed use proposals being put forward by Anglia Maltings would generate a traffic generation of 55 vehicles two-way in the morning peak hour and 62 in the evening peak hour. This would be a 14-15 vehicle increase compared to the EDME use, however equates one additional vehicle every four minutes. This is not a material increase and is likely to be imperceptible in practice.

- 5.3.3 The consultation Local Plan suggests the continuing use of the EDME site for employment use. It is assumed that this is with the exception of Thorn Quay and The Abbey which have already been permitted for residential use. Based on the average trip generation for employment uses, plus the permitted residential development a morning peak hour traffic generation of 109 vehicles two-way could occur, with 78 vehicles two-way in the evening peak hour.

- 5.3.4 Compared to the proposed uses there would be a net traffic difference of 54 vehicles in the morning peak hour and 16 in the evening peak hour. The review therefore indicates that the Anglia Maltings proposals would generate a lower level of traffic than reusing the site for alternative employment uses.

5.4 Road Safety Review

- 5.4.1 The existing level of accidents recorded does not indicate that there is a current road safety issue in the local area. With the level of additional traffic anticipated with the proposed mixed use land uses there is no reason to suggest that the proposals would cause a road safety concern.

- 5.4.2 The removal of the number of heavy goods vehicles and associated turning and reversing movements, plus forklift truck movements on High Street resulting from EDME is a benefit of the mixed use allocation proposals, reducing any potential conflict between these vehicles and other road users.

6.0 CONCLUSIONS

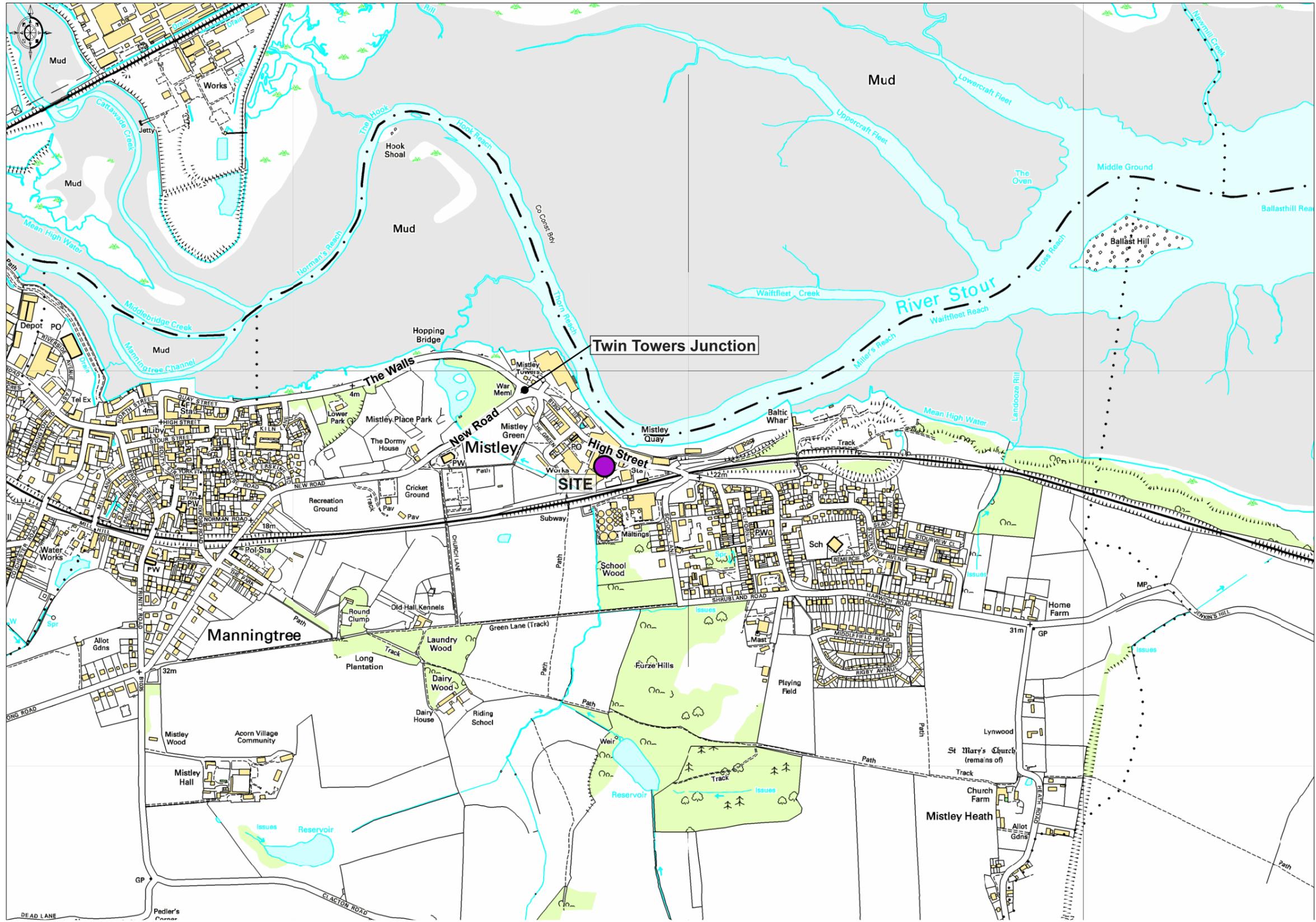
- 6.1 The principle of mixed uses on the site is accepted in the Adopted Local Plan.
- 6.2 The proximity to local facilities and direct access to both bus and train services would reduce the need to travel by car in line with national and local policy when considering locations for development.
- 6.3 A mixed use development would reduce the number of heavy goods vehicle movements on the local and wider road network, which is a benefit in traffic terms.
- 6.4 Potential development traffic for a mixed use scheme is comparable to the current permission on site and is lower than an alternative employment scheme if EDME were to vacate the site.
- 6.5 The removal of the number of heavy goods vehicles and forklift truck movements on High Street resulting from EDME is a benefit of the mixed use allocation proposals and for road safety conditions.
- 6.6 These conclusions show that transport considerations support the proposed mixed use allocation.

1 : 50,000 @ A4



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1 : 10,000 @ A3



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PERMITTED TRAFFIC GENERATION CALCULATIONS

1.0 EXISTING AND PERMITTED TRAFFIC GENERATION

1.1 The permitted development at the EDME site comprises the EDME operations plus residential development at the Thorn Quay warehouse and The Abbey.

1.2 Traffic surveys undertaken at the EDME site in 2011, as part of the New Warehouse planning application provide details of the typical traffic generation of the site in its current form. The surveys recorded the following vehicle movements to/from the site in the peak hours:

Existing EDME Vehicle Traffic Generation			
Time Period	Arrivals	Departures	Two-way
Morning Peak Hour 0800-0900	17	4	21
Evening Peak Hour 1700-1800	8	19	27

1.3 For the northern part of the site the traffic flows associated with the permitted Thorn Quay residential development, as set out in the Transport Statement dated April 2012 submitted with the planning application are as follows:

Permitted Thorn Quay Residential/Warehouse/Office Vehicle Traffic Generation			
Time Period	Arrivals	Departures	Two-way
Morning Peak Hour 0800-0900	8	9	17
Evening Peak Hour 1700-1800	8	9	17

1.4 No traffic generation calculations were provided for The Abbey planning application. However based on the private house trip rates determined for the proposed future uses on the site, discussed in more detail in Appendix 5, the following traffic would be associated with the permitted Abbey residential units:

Permitted The Abbey Residential Vehicle Traffic Generation			
Time Period	Arrivals	Departures	Two-way
Morning Peak Hour 0800-0900	1	2	3
Evening Peak Hour 1700-1800	2	1	3

1.5 The total permitted traffic generation of the EDME site as a whole is therefore:

Total Permitted EDME Site Vehicle Traffic Generation			
Time Period	Arrivals	Departures	Two-way
Morning Peak Hour 0800-0900	26	15	41
Evening Peak Hour 1700-1800	18	29	47

2.0 POTENTIAL EMPLOYMENT TRAFFIC GENERATION

2.1 The EDME site is currently not fully operational and therefore a review of the potential traffic generation of an employment use on the southern part of the site has been undertaken using the TRICS national database.

2.2 In the 2006 Local Plan review the local authority suggested that the site should be safeguarded for employment. At the time it was identified that if the site was redeveloped for employment it was estimated that a similar floor area could be accommodated on the site, as per the existing use, around 9,300sqm. Around 25% of the site was assumed to accommodate B1 offices and 75% B1c/B2 Light Industrial/Industrial use.

2.3 B1 Office sites less than 5,000sqm in edge of town centre, suburban and edge of town locations in England (excluding London), Wales, and Scotland were reviewed. Only sites in areas with a population of less than 50,000 people within five miles and 10,000 within one mile were selected as these would be more representative of the rural surroundings of Mistley. No directly comparable sites were available in the database.

2.4 A summary of the B1 office peak hour vehicle trip rates is set out below with the full database output provided at Appendix 4:

TRICS Office Vehicle Traffic Generation (per 100sqm)			
Time Period	Arrivals	Departures	Two-way
Morning Peak Hour 0800-0900	2.121	0.329	2.450
Evening Peak Hour 1700-1800	0.183	0.987	1.170

2.5 The 2325sqm of office space would generate the following vehicle traffic in the peak hours:

Potential Office Vehicle Traffic Generation			
Time Period	Arrivals	Departures	Two-way
Morning Peak Hour 0800-0900	49	8	57
Evening Peak Hour 1700-1800	4	23	27

2.6 For the B1c/B2 element of the site Industrial Estate sites with less than 15,000sqm in edge of town centre, suburban and edge of town locations in England (excluding London), Wales, and Scotland were reviewed. Only sites in areas with a population of less than 50,000 people within five miles and 10,000 within one mile were selected as these would be more representative of Mistley.

2.7 A summary of the industrial estate peak hour vehicle trip rates is set out below with the full database output provided at Appendix 4:

TRICS Industrial Estate Vehicle Traffic Generation (per 100sqm)			
Time Period	Arrivals	Departures	Two-way
Morning Peak Hour 0800-0900	0.314	0.138	0.452
Evening Peak Hour 1700-1800	0.075	0.377	0.452

- 2.8 The 6975sqm of B1c/B2 employment space would generate the following vehicle traffic in the peak hours:

Potential B1c/B2 Vehicle Traffic Generation			
Time Period	Arrivals	Departures	Two-way
Morning Peak Hour 0800-0900	22	10	32
Evening Peak Hour 1700-1800	5	26	31

- 2.9 Including the permitted residential development at Thorn Quay and The Abbey, the total potential traffic generation of the EDME site as a whole is therefore:

Total Potential EDME Site Vehicle Traffic Generation			
Time Period	Arrivals	Departures	Two-way
Morning Peak Hour 0800-0900	80	29	109
Evening Peak Hour 1700-1800	19	59	78

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
Category : A - OFFICE

VEHICLES

Selected regions and areas:

03 SOUTH WEST	
DC DORSET	1 days
10 WALES	
PS POWYS	1 days

Filtering Stage 2 selection:

Parameter: Gross floor area
Actual Range: 1550 to 3920 (units: sqm)
Range Selected by User: 186 to 5000 (units: sqm)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 26/11/15

Selected survey days:

Tuesday	1 days
Thursday	1 days

Selected survey types:

Manual count	2 days
Directional ATC Count	0 days

Selected Locations:

Edge of Town Centre	2
---------------------	---

Selected Location Sub Categories:

No Sub Category	2
-----------------	---

Filtering Stage 3 selection:

Use Class:

B1	2 days
----	--------

Population within 1 mile:

5,001 to 10,000	1 days
15,001 to 20,000	1 days

Population within 5 miles:

5,001 to 25,000	1 days
25,001 to 50,000	1 days

Car ownership within 5 miles:

1.1 to 1.5	2 days
------------	--------

Travel Plan:

No	2 days
----	--------

LIST OF SITES relevant to selection parameters

1	DC-02-A-08	OFFICE		DORSET
		STATION APPROACH		
		DORCHESTER		
		Edge of Town Centre		
		No Sub Category		
		Total Gross floor area:	1550 sqm	
		Survey date: THURSDAY	03/07/08	Survey Type: MANUAL
2	PS-02-A-01	COUNCIL OFFICES		POWYS
		SEVERN ROAD		
		WELSHPOOL		
		Edge of Town Centre		
		No Sub Category		
		Total Gross floor area:	3920 sqm	
		Survey date: TUESDAY	12/05/15	Survey Type: MANUAL

TRIP RATE for Land Use 02 - EMPLOYMENT/A - OFFICE

VEHICLES**Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	2	2735	0.494	2	2735	0.091	2	2735	0.585
08:00 - 09:00	2	2735	2.121	2	2735	0.329	2	2735	2.450
09:00 - 10:00	2	2735	0.932	2	2735	0.439	2	2735	1.371
10:00 - 11:00	2	2735	0.439	2	2735	0.347	2	2735	0.786
11:00 - 12:00	2	2735	0.329	2	2735	0.603	2	2735	0.932
12:00 - 13:00	2	2735	0.494	2	2735	0.823	2	2735	1.317
13:00 - 14:00	2	2735	0.475	2	2735	0.731	2	2735	1.206
14:00 - 15:00	2	2735	0.329	2	2735	0.548	2	2735	0.877
15:00 - 16:00	2	2735	0.146	2	2735	0.347	2	2735	0.493
16:00 - 17:00	2	2735	0.183	2	2735	0.695	2	2735	0.878
17:00 - 18:00	2	2735	0.183	2	2735	0.987	2	2735	1.170
18:00 - 19:00	2	2735	0.018	2	2735	0.183	2	2735	0.201
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			6.143			6.123			12.266

Parameter summary

Trip rate parameter range selected: 1550 - 3920 (units: sqm)
 Survey date range: 01/01/08 - 26/11/15
 Number of weekdays (Monday-Friday): 2
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
Category : D - INDUSTRIAL ESTATE

VEHICLES

Selected regions and areas:

02 SOUTH EAST
KC KENT 1 days
06 WEST MIDLANDS
HE HEREFORDSHIRE 1 days

Filtering Stage 2 selection:

Parameter: Gross floor area
Actual Range: 5214 to 10715 (units: sqm)
Range Selected by User: 552 to 15000 (units: sqm)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 22/10/15

Selected survey days:

Tuesday 1 days
Wednesday 1 days

Selected survey types:

Manual count 2 days
Directional ATC Count 0 days

Selected Locations:

Suburban Area (PPS6 Out of Centre) 1
Edge of Town 1

Selected Location Sub Categories:

Industrial Zone 1
Residential Zone 1

Filtering Stage 3 selection:

Use Class:

B1 1 days
B2 1 days

Population within 1 mile:

5,001 to 10,000 1 days
25,001 to 50,000 1 days

Population within 5 miles:

25,001 to 50,000 2 days

Car ownership within 5 miles:

1.1 to 1.5 2 days

Travel Plan:

No 2 days

LIST OF SITES relevant to selection parameters

- | | | | |
|----------|------------------------------------|--------------------------|----------------------|
| 1 | HE-02-D-02 | BUSINESS PARK | HEREFORDSHIRE |
| | BURCOTT ROAD | | |
| | HEREFORD | | |
| | Suburban Area (PPS6 Out of Centre) | | |
| | Industrial Zone | | |
| | Total Gross floor area: | 5214 sqm | |
| | Survey date: TUESDAY | 22/10/13 | Survey Type: MANUAL |
| 2 | KC-02-D-02 | INDUSTRIAL ESTATE | KENT |
| | SOUTHWELL ROAD | | |
| | DEAL | | |
| | Edge of Town | | |
| | Residential Zone | | |
| | Total Gross floor area: | 10715 sqm | |
| | Survey date: WEDNESDAY | 28/11/12 | Survey Type: MANUAL |

TRIP RATE for Land Use 02 - EMPLOYMENT/D - INDUSTRIAL ESTATE

VEHICLES**Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	2	7965	0.339	2	7965	0.044	2	7965	0.383
08:00 - 09:00	2	7965	0.314	2	7965	0.138	2	7965	0.452
09:00 - 10:00	2	7965	0.245	2	7965	0.144	2	7965	0.389
10:00 - 11:00	2	7965	0.176	2	7965	0.126	2	7965	0.302
11:00 - 12:00	2	7965	0.107	2	7965	0.119	2	7965	0.226
12:00 - 13:00	2	7965	0.107	2	7965	0.132	2	7965	0.239
13:00 - 14:00	2	7965	0.132	2	7965	0.113	2	7965	0.245
14:00 - 15:00	2	7965	0.144	2	7965	0.107	2	7965	0.251
15:00 - 16:00	2	7965	0.144	2	7965	0.176	2	7965	0.320
16:00 - 17:00	2	7965	0.144	2	7965	0.364	2	7965	0.508
17:00 - 18:00	2	7965	0.075	2	7965	0.377	2	7965	0.452
18:00 - 19:00	2	7965	0.019	2	7965	0.057	2	7965	0.076
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.946			1.897			3.843

Parameter summary

Trip rate parameter range selected: 5214 - 10715 (units: sqm)
 Survey date range: 01/01/08 - 22/10/15
 Number of weekdays (Monday-Friday): 2
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

Accident Record Plot High Street, Mistley

Data Source : Crashmap
Data Received 18/08/16 for Period 01/01/11 to 31/12/15

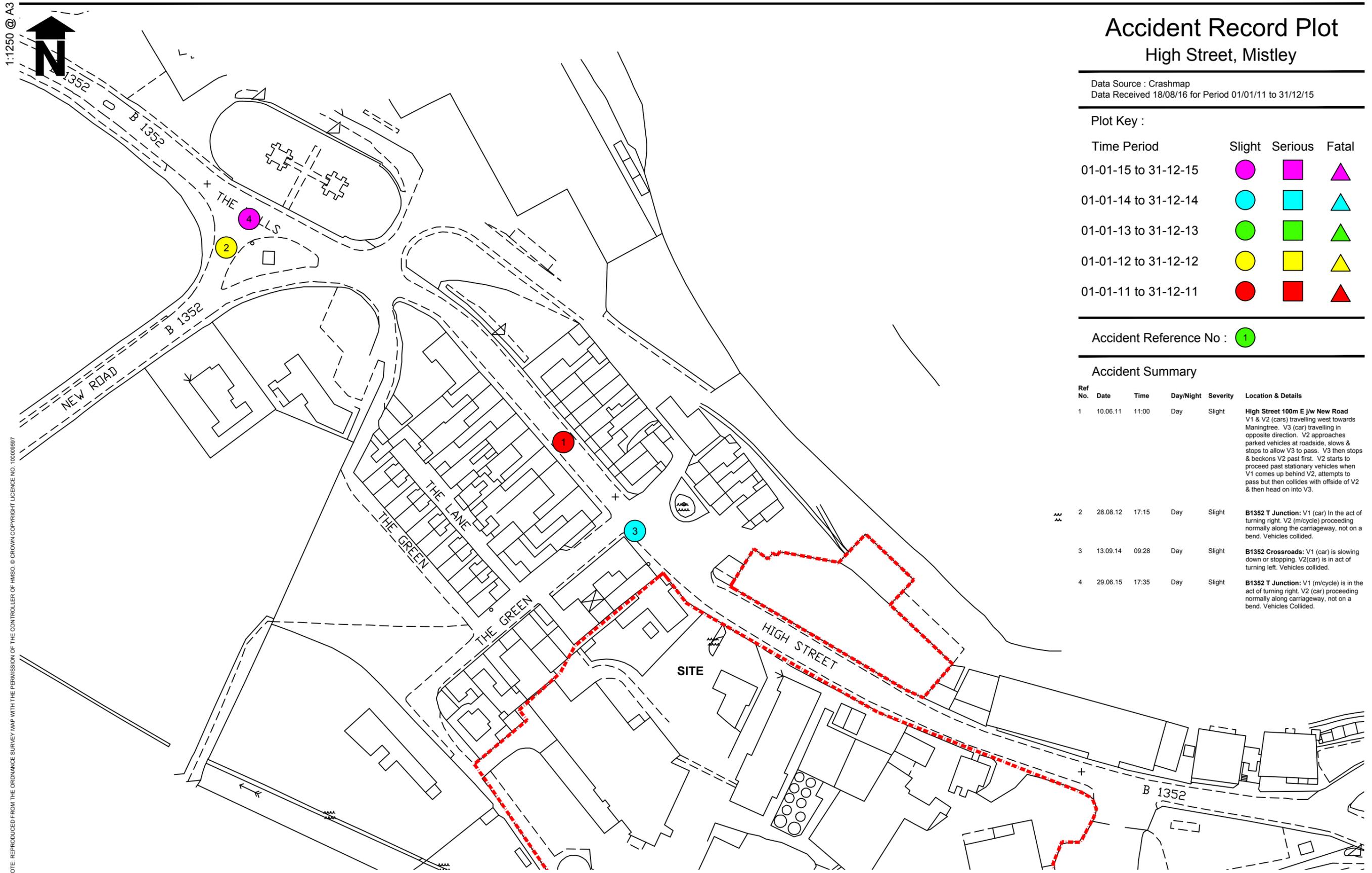
Plot Key :

Time Period	Slight	Serious	Fatal
01-01-15 to 31-12-15			
01-01-14 to 31-12-14			
01-01-13 to 31-12-13			
01-01-12 to 31-12-12			
01-01-11 to 31-12-11			

Accident Reference No :

Accident Summary

Ref No.	Date	Time	Day/Night	Severity	Location & Details
1	10.06.11	11:00	Day	Slight	High Street 100m E j/w New Road V1 & V2 (cars) travelling west towards Maningtree. V3 (car) travelling in opposite direction. V2 approaches parked vehicles at roadside, slows & stops to allow V3 to pass. V3 then stops & beckons V2 past first. V2 starts to proceed past stationary vehicles when V1 comes up behind V2, attempts to pass but then collides with offside of V2 & then head on into V3.
2	28.08.12	17:15	Day	Slight	B1352 T Junction: V1 (car) in the act of turning right. V2 (m/cycle) proceeding normally along the carriageway, not on a bend. Vehicles collided.
3	13.09.14	09:28	Day	Slight	B1352 Crossroads: V1 (car) is slowing down or stopping. V2(car) is in act of turning left. Vehicles collided.
4	29.06.15	17:35	Day	Slight	B1352 T Junction: V1 (m/cycle) is in the act of turning right. V2 (car) proceeding normally along carriageway, not on a bend. Vehicles Collided.



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N . T . S @ A3



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TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED

VEHICLES

Selected regions and areas:

02 SOUTH EAST	
HC HAMPSHIRE	1 days
06 WEST MIDLANDS	
SH SHROPSHIRE	1 days
WK WARWICKSHIRE	1 days
07 YORKSHIRE & NORTH LINCOLNSHIRE	
NY NORTH YORKSHIRE	3 days
09 NORTH	
CB CUMBRIA	1 days
10 WALES	
PS POWYS	1 days

Filtering Stage 2 selection:

Parameter: Number of dwellings
Actual Range: 17 to 115 (units:)
Range Selected by User: 5 to 4334 (units:)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 12/11/15

Selected survey days:

Monday	1 days
Tuesday	1 days
Wednesday	1 days
Thursday	3 days
Friday	2 days

Selected survey types:

Manual count	8 days
Directional ATC Count	0 days

Selected Locations:

Suburban Area (PPS6 Out of Centre)	3
Edge of Town	5

Selected Location Sub Categories:

Residential Zone	6
No Sub Category	2

Filtering Stage 3 selection:

Use Class:

C3	8 days
----	--------

Population within 1 mile:

1,001 to 5,000	3 days
5,001 to 10,000	5 days

Filtering Stage 3 selection (Cont.):Population within 5 miles:

5,001 to 25,000	4 days
25,001 to 50,000	4 days

Car ownership within 5 miles:

0.6 to 1.0	2 days
1.1 to 1.5	6 days

Travel Plan:

No	8 days
----	--------

LIST OF SITES relevant to selection parameters

1	CB-03-A-04	SEMI DETACHED	CUMBRIA
	MOORCLOSE ROAD		
	SALTERBACK		
	WORKINGTON		
	Edge of Town		
	No Sub Category		
	Total Number of dwellings:	82	
	Survey date: <i>FRIDAY</i>	24/04/09	Survey Type: <i>MANUAL</i>
2	HC-03-A-17	HOUSES & FLATS	HAMPSHIRE
	CANADA WAY		
	LIPHOOK		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	36	
	Survey date: <i>THURSDAY</i>	12/11/15	Survey Type: <i>MANUAL</i>
3	NY-03-A-06	BUNGALOWS & SEMI DET.	NORTH YORKSHIRE
	HORSEFAIR		
	BOROUGHBRIDGE		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	115	
	Survey date: <i>FRIDAY</i>	14/10/11	Survey Type: <i>MANUAL</i>
4	NY-03-A-07	DETACHED & SEMI DET.	NORTH YORKSHIRE
	CRAVEN WAY		
	BOROUGHBRIDGE		
	Edge of Town		
	No Sub Category		
	Total Number of dwellings:	23	
	Survey date: <i>TUESDAY</i>	18/10/11	Survey Type: <i>MANUAL</i>
5	NY-03-A-11	PRIVATE HOUSING	NORTH YORKSHIRE
	HORSEFAIR		
	BOROUGHBRIDGE		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	23	
	Survey date: <i>WEDNESDAY</i>	18/09/13	Survey Type: <i>MANUAL</i>
6	PS-03-A-02	DETACHED/SEMI-DETACHED	POWYS
	GUNROG ROAD		
	WELSHPOOL		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	28	
	Survey date: <i>MONDAY</i>	11/05/15	Survey Type: <i>MANUAL</i>
7	SH-03-A-05	SEMI-DETACHED/TERRACED	SHROPSHIRE
	SANDCROFT		
	SUTTON HILL		
	TELFORD		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	54	
	Survey date: <i>THURSDAY</i>	24/10/13	Survey Type: <i>MANUAL</i>

LIST OF SITES relevant to selection parameters (Cont.)

8	WK-03-A-02	BUNGALOWS	WARWICKSHIRE
	NARBERTH WAY		
	POTTERS GREEN		
	COVENTRY		
	Edge of Town		
	Residential Zone		
	Total Number of dwellings:	17	
	Survey date: THURSDAY	17/10/13	Survey Type: MANUAL

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

VEHICLES**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	8	47	0.079	8	47	0.212	8	47	0.291
08:00 - 09:00	8	47	0.132	8	47	0.381	8	47	0.513
09:00 - 10:00	8	47	0.153	8	47	0.146	8	47	0.299
10:00 - 11:00	8	47	0.172	8	47	0.164	8	47	0.336
11:00 - 12:00	8	47	0.159	8	47	0.177	8	47	0.336
12:00 - 13:00	8	47	0.180	8	47	0.175	8	47	0.355
13:00 - 14:00	8	47	0.172	8	47	0.161	8	47	0.333
14:00 - 15:00	8	47	0.183	8	47	0.196	8	47	0.379
15:00 - 16:00	8	47	0.265	8	47	0.190	8	47	0.455
16:00 - 17:00	8	47	0.299	8	47	0.146	8	47	0.445
17:00 - 18:00	8	47	0.304	8	47	0.167	8	47	0.471
18:00 - 19:00	8	47	0.228	8	47	0.127	8	47	0.355
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.326			2.242			4.568

Parameter summary

Trip rate parameter range selected: 17 - 115 (units:)
 Survey date range: 01/01/08 - 12/11/15
 Number of weekdays (Monday-Friday): 8
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

Calculation Reference: AUDIT-811401-160804-0838

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : C - FLATS PRIVATELY OWNED

VEHICLES

Selected regions and areas:

09 NORTH
CB CUMBRIA 2 days

Filtering Stage 2 selection:

Parameter: Number of dwellings
Actual Range: 33 to 35 (units:)
Range Selected by User: 6 to 215 (units:)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 26/05/15

Selected survey days:

Monday 1 days
Wednesday 1 days

Selected survey types:

Manual count 2 days
Directional ATC Count 0 days

Selected Locations:

Suburban Area (PPS6 Out of Centre) 1
Edge of Town 1

Selected Location Sub Categories:

Residential Zone 1
No Sub Category 1

Filtering Stage 3 selection:

Use Class:

C3 2 days

Population within 1 mile:

10,001 to 15,000 1 days
20,001 to 25,000 1 days

Population within 5 miles:

5,001 to 25,000 1 days
25,001 to 50,000 1 days

Car ownership within 5 miles:

1.1 to 1.5 2 days

Travel Plan:

No 2 days

LIST OF SITES relevant to selection parameters

1	CB-03-C-02	BLOCK OF FLATS	CUMBRIA
	BRIDGE LANE		
	PENRITH		
	Edge of Town		
	No Sub Category		
	Total Number of dwellings:	35	
	Survey date: WEDNESDAY	11/06/14	Survey Type: MANUAL
2	CB-03-C-03	FLATS & BUNGALOWS	CUMBRIA
	LOUND STREET		
	KENDAL		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Number of dwellings:	33	
	Survey date: MONDAY	09/06/14	Survey Type: MANUAL

TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED

VEHICLES**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	2	34	0.059	2	34	0.118	2	34	0.177
08:00 - 09:00	2	34	0.088	2	34	0.132	2	34	0.220
09:00 - 10:00	2	34	0.118	2	34	0.132	2	34	0.250
10:00 - 11:00	2	34	0.103	2	34	0.074	2	34	0.177
11:00 - 12:00	2	34	0.118	2	34	0.103	2	34	0.221
12:00 - 13:00	2	34	0.103	2	34	0.074	2	34	0.177
13:00 - 14:00	2	34	0.074	2	34	0.132	2	34	0.206
14:00 - 15:00	2	34	0.088	2	34	0.147	2	34	0.235
15:00 - 16:00	2	34	0.088	2	34	0.074	2	34	0.162
16:00 - 17:00	2	34	0.103	2	34	0.029	2	34	0.132
17:00 - 18:00	2	34	0.265	2	34	0.162	2	34	0.427
18:00 - 19:00	2	34	0.221	2	34	0.191	2	34	0.412
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.428			1.368			2.796

Parameter summary

Trip rate parameter range selected: 33 - 35 (units:)
 Survey date date range: 01/01/08 - 26/05/15
 Number of weekdays (Monday-Friday): 2
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

Calculation Reference: AUDIT-811401-160808-0844

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
Category : F - WAREHOUSING (COMMERCIAL)

VEHICLES

Selected regions and areas:

04 EAST ANGLIA
SF SUFFOLK 1 days
09 NORTH
CB CUMBRIA 1 days

Filtering Stage 2 selection:

Parameter: Gross floor area
Actual Range: 2950 to 4700 (units: sqm)
Range Selected by User: 387 to 10000 (units: sqm)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/08 to 09/11/15

Selected survey days:

Tuesday 1 days
Friday 1 days

Selected survey types:

Manual count 2 days
Directional ATC Count 0 days

Selected Locations:

Edge of Town 2

Selected Location Sub Categories:

Industrial Zone 2

Filtering Stage 3 selection:

Use Class:

B8 2 days

Population within 1 mile:

5,001 to 10,000 2 days

Population within 5 miles:

5,001 to 25,000 2 days

Car ownership within 5 miles:

1.1 to 1.5 2 days

Travel Plan:

No 2 days

LIST OF SITES relevant to selection parameters

1	CB-02-F-01	DOMINO'S PIZZA	CUMBRIA
	COWPER ROAD		
	GILWILLY IND. ESTATE		
	PENRITH		
	Edge of Town		
	Industrial Zone		
	Total Gross floor area:	2950 sqm	
	Survey date: TUESDAY	10/06/14	Survey Type: MANUAL
2	SF-02-F-03	ROAD HAULAGE	SUFFOLK
	CENTRAL AVENUE		
	WARREN HEATH		
	IPSWICH		
	Edge of Town		
	Industrial Zone		
	Total Gross floor area:	4700 sqm	
	Survey date: FRIDAY	18/09/15	Survey Type: MANUAL

TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)

VEHICLES**Calculation factor: 100 sqm****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00	1	2950	0.102	1	2950	0.000	1	2950	0.102
06:00 - 07:00	1	2950	0.136	1	2950	0.034	1	2950	0.170
07:00 - 08:00	2	3825	0.248	2	3825	0.118	2	3825	0.366
08:00 - 09:00	2	3825	0.366	2	3825	0.222	2	3825	0.588
09:00 - 10:00	2	3825	0.183	2	3825	0.131	2	3825	0.314
10:00 - 11:00	2	3825	0.248	2	3825	0.248	2	3825	0.496
11:00 - 12:00	2	3825	0.235	2	3825	0.222	2	3825	0.457
12:00 - 13:00	2	3825	0.235	2	3825	0.170	2	3825	0.405
13:00 - 14:00	2	3825	0.261	2	3825	0.248	2	3825	0.509
14:00 - 15:00	2	3825	0.196	2	3825	0.144	2	3825	0.340
15:00 - 16:00	2	3825	0.131	2	3825	0.314	2	3825	0.445
16:00 - 17:00	2	3825	0.092	2	3825	0.314	2	3825	0.406
17:00 - 18:00	2	3825	0.092	2	3825	0.222	2	3825	0.314
18:00 - 19:00	2	3825	0.131	2	3825	0.144	2	3825	0.275
19:00 - 20:00	1	2950	0.203	1	2950	0.203	1	2950	0.406
20:00 - 21:00	1	2950	0.102	1	2950	0.136	1	2950	0.238
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.961			2.870			5.831

Parameter summary

Trip rate parameter range selected: 2950 - 4700 (units: sqm)
 Survey date range: 01/01/08 - 09/11/15
 Number of weekdays (Monday-Friday): 2
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

PORPOSED TRAFFIC GENERATION CALCULATIONS

1.0 PROPOSED TRAFFIC GENERATION

1.1 A review of the TRICS National Database version 7.3.2 has been undertaken to determine the likely traffic generation of the proposed mixed use development. Sites in England (excluding London), Wales and Scotland in the following categories were reviewed:

- Private Houses;
- Private Flats;
- Offices;
- Warehouse.

1.2 The TRICS database doesn't contain many sites comparable to Mistley. However for the purposes of the review the following detailed search criteria were selected with the aim to use the most comparable sites available.

1.3 For private houses and flats sites in suburban and edge of town locations with a population of less than 50,000 people within five miles, and 10,000 within one mile were selected as these would be more representative of the rural surroundings of Mistley.

1.4 For office sites those in edge of town centre locations were also considered due to the low level of sites available. Also only offices with less than 5000sqm in floor area were considered, as larger offices would not be comparable to the likely offices at Mistley.

1.5 For the warehouse site review all locations with a population of less than 50,000 people within five miles were considered due to the lack of comparable sites, with only warehouses less than 10,000sqm considered in the review.

1.6 The peak hour trip rates determined from TRICS for the proposed houses are set out below with the full database outputs provided at Appendices 4 and 7:

Morning Peak Hour 0800-0900	TRICS Vehicle Trip Rates		
	Arrivals	Departures	Two-way
Private Houses (per dwelling)	0.132	0.381	0.513
Private Flats (per dwelling)	0.088	0.132	0.220
Offices (per 100sqm)	2.121	0.329	2.45
Warehouse (per 100sqm)	0.366	0.222	0.588

Evening Peak Hour 1700-1800	TRICS Vehicle Trip Rates		
	Arrivals	Departures	Two-way
Private Houses (per dwelling)	0.304	0.167	0.471
Private Flats (per dwelling)	0.265	0.162	0.427
Offices (per 100sqm)	0.183	0.987	1.17
Warehouse (per 100sqm)	0.092	0.222	0.314

Proposed Traffic Generation

- 1.7 The above trip rates would generate the following vehicle traffic to/from the proposed mixed uses at the EDME site:

Morning Peak Hour 0800-0900	Proposed Vehicle Trips		
	Arrivals	Departures	Two-way
Private Houses	7	20	27
Private Flats	6	10	16
Offices	4	1	5
Warehouse	4	3	7
Total	21	34	55

Evening Peak Hour 1700-1800	Proposed Vehicle Trips		
	Arrivals	Departures	Two-way
Private Houses	16	9	25
Private Flats	19	12	31
Offices	0	2	2
Warehouse	1	3	4
Total	36	26	62

Appendix 7

Sustainability Appraisal of alternative options for the Edme site

Sustainability Appraisal: Edme Site, Mistley

KEY	
Strong positive	
Positive	
Neutral or unknown	
Negative	
Strong negative	
No impact / not applicable	

Ref.	Sustainability Objectives	Impacts / Comments	
		Proposed Mixed-Use Scheme (residential led).	Retention of Existing Buildings on the Edme Site for Employment Use.
1) To provide decent and affordable homes for all			
	- Housing growth	Release of redundant employment site creates space for new housing in sustainable location	Employment allocation would mean less space for housing, which can only be delivered through green field development
	- Housing types	Neutral	Neutral
	- Housing design / density	Opportunities for a mix of dwelling types.	Neutral
2) To ensure that development is located sustainably and makes efficient use of land			
	- Regeneration	Would deliver much needed regeneration in a Priority Area for Regeneration, as indicated in the adopted Local	Would significantly hamper delivery of regeneration in the Priority Area for Regeneration, contrary to the policies in

Ref.	Sustainability Objectives	Impacts / Comments	
		Proposed Mixed-Use Scheme (residential led).	Retention of Existing Buildings on the Edme Site for Employment Use.
		Plan.	the adopted Local Plan.
	- Retail, office and leisure	Would allow delivery of mixed uses in the centre of Mistley	Would only allow delivery of employment uses.
	- Greenfield / Brownfield	Allows re-use of brownfield land	Prevents re-use of brownfield land / gives rise to the need for green field land
	- Accessibility		
3) Harness the District's economic strengths			
	- Employment floorspace	Neutral - would lead to reduction in floorspace at Edme site, but delivery of new floorspace suited to business, both at Edme site and the new site where Edme relocates to	Neutral – employment floorspace retained at Edme site, but that space is now suited to the needs of modern business.
	- Cultural, Visitor and Tourism	Neutral	Neutral
	- Town centres	More customers to support local services likely to result from proposed development	Neutral
	- The rural economy	Rural economy likely to be positively impacted by retaining and enhancing the prospects of a key local employer (Edme).	A key local employer (Edme) would be significantly compromised if it was forced to continue using the existing site and buildings, which could impact the rural economy negatively.
4) Minimise transport growth whilst capturing the economic benefits of international gateways			
	- Public transport	Increased use of public transport could make routes more profitable and successful.	Neutral
	- Port related development	Facilitating the success of Edme is likely to increase trade for local ports, which are used by the company.	Neutral
5) To build stronger more resilient sustainable communities with better education and social outcomes			
	- Distance to primary school	Local primary school nearby, in Mistley.	N/A
	- Distance to secondary school	Local secondary school nearby, in Manningtree.	N/A
	- Primary school capacity	Financial contributions needed, as would be standard practice.	N/A

Ref.	Sustainability Objectives	Impacts / Comments	
		Proposed Mixed-Use Scheme (residential led).	Retention of Existing Buildings on the Edme Site for Employment Use.
	- Secondary school capacity	Financial contributions needed, as would be standard practice.	N/A
	- Distance to GP	GP nearby, in Manningtree	N/A
	- Open space	Open space very nearby, including at Mistley Green.	N/A
6) Protect and enhance natural, historic and environmental assets			
	- Historic environment	Opportunities for enhancement of Conservation Area, re-use of dilapidated / decaying Listed Building – thereby meeting statutory duties towards not only preservation, but enhancement.	No opportunities to enhance the Conservation Area or to find funds to invest in decaying Listed Building. The ultimate impact is likely to be negative.
	- Accessible natural green space	Neutral	No green space impacted
	- SSSIs	Neutral	Neutral
	- SPAs, SACs, Ramsar, NNRs, LNRs, LoWSs	Neutral	Neutral
	- Ancient Woodland, Protected Lanes, TPOs	Neutral	Neutral
7) Reduce contributions to climate change			
	- Renewable energy	Opportunity to replace existing buildings, which are highly inefficient, with ones that meet much higher modern standards.	Neutral – existing buildings remain, which are highly inefficient.
	- AQMAs	Neutral	Neutral
	- Contamination	Existing contamination cleaned up.	Neutral / contamination not addressed.
8) To conserve and enhance natural resources and reduce climate change impacts			
	- Groundwater	Not likely to be impacted.	Neutral
	- Fluvial flood risk	No potential issues with fluvial flooding.	Neutral
	- Surface water flood risk	Can be addressed through the usual design methods.	Neutral
	- Mineral safeguarding	N/A	N/A
	- Waste consultations	Neutral	Neutral

Appendix 2



Critique of the Adam Hendry report, regarding the Mistley Port

1. **Introduction:** The Adams Hendry report (AH) was commissioned by Tendring District Council (TDC) and was supplied with information provided by TWL/MQF, which is either not verified or not revealed.

This note analyses certain assumptions made.

2. **Water Depth, para 4.5.1 refers:**

- 2.1 Mistley Quay can only handle 3,000t vessels when full moon and high tides coincide. Plans to dredge the river proposed to Gowlett Grain, leasees of the grain silos, have not been fulfilled.

Normally vessels of 1,600t – 2,500t dock at the Baltic Wharf and East Quay Berths; this is supported by the DfT average consignment of 1,940t.

- 2.2 Natural England have not received any application for dredging, and it must be assumed that TWL/MQF assertion to AH in 5.3.1 that a maximum size as 5,000t is not borne out by the facts.

3. **Port Capacity, p29, para 5.6.5 refers:**

- 3.1 The capacity of the port is identified as being 205,920t.

Throughput in 2008 was 161,079t, that is 78% of capacity. Compound growth in tonnage over the last ten years has been 1.2% pa, although there was a 7% fall in tonnage from 2007 to 2008. Notwithstanding the publication of the AH report in November 2009, no indication of trade in 2009 for the 9 months or first 3 quarters is given.

This does not indicate any pressing need for expansion land.

- 3.2 TDC has not revealed tonnage in 2009 and 2010. These two years along with that for 2008 should be provided to produce the base figures from which to calculate the year in which full capacity will be reached.

- 3.3 On the basis of the 2008 tonnage of 161,079t and a compound growth rate of 1.2%, then full capacity will not be reached for 20 years, 2028.

The opportunity for other improvements to the facilities at Mistley Quay, including remedying the poor quality and shortage of grain silo capacity, can be taken in the meantime.

4. **Port Throughput, p24, table 5.1 (sic) refers**

- 4.1 Agricultural products comprise 41% of tonnage throughput. These include grain and fertiliser in one tonne bags. Neither product requires further treatment or packaging and the latter can be stored under sheeting.

The rise in tonnage is from 26,562t to 65,548t from 2005-2008, +147%, and contrasts with the fall in all other products from 128,633 to 95,531, -25%.

- 4.2 Silos: Agricultural products can be handled through the silos leased to Gowlett Grain. It is understood that, due to the lack of investment in the berths, neither leasor nor leasee are prepared to invest in improvements.

The theoretical capacity of the silos is c.1,100t, but in practical terms the leasee can only make 800t available for a third party user like Crisp Maltings. As a result about half of all cargoes are loaded “over the side” from road transport.

- 4.3 Crisp Malting Group (CMG) transports 35,418t of malt to Scotland from its 3 East Anglian maltings. In 2010 sea movement totalled 19,908t of which Mistley accounted for 8,870t, 6 vessels.

This suggests that CMG represents about 14% of existing tonnage of agricultural products (using TWL’s 2008 data as proxy), and could increase to 40% of an enhanced agricultural throughput if the handling facilities at Mistley Quay received proper investment.

- 4.4 TWL Storage, p.24 table 5.1 refers; it is noted that TWL throughput does not include volumes by road.

No interrogation was made of TWL’s tonnage of materials received for warehousing by road and despatched after warehousing by road.

Thus it is not possible to verify the extent to which the shortage of available storage is a result of self-determined usage of TWL’s warehousing for outside, shore-based, use.

Nor is it possible to determine whether TWL’s income stream for customers includes a rental charge. This is particularly relevant in the case of fertiliser which is shipped regularly throughout the year, but mainly despatched to farmers in autumn and spring. Storage rents will comprise a substantial element of any fee charged.

- 4.5 Forecasts, para 5.7.3 refers; TWL provided forecasts suggesting a tonnage increase of 30%, from 2008 to 2010. This assertion can now be checked and verified, or otherwise.

It should be noted that DfT forecasts to 2030 are for a negative trend in agricultural products, but this is the largest category of product handled at Mistley Quay. It should further be noted that c.8,000t of any increase in tonnage at Mistley derives from CM G’s own trade.

Note to 4

- 4.6 *Fertiliser: it should be noted that fertiliser is a semi-hazardous product. Neither the residents of the No.1 Maltings nor those around Swan Quay would support the enclosed storage of fertiliser.*

As stored in the Stockdale Warehouse or on the Quayside it may be relatively innocuous to residents; but the particular features of fertilisers need to be considered.