

24 July 2020

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Melksham Town Council
townhall@melksham-tc.gov.uk

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Dear Sir/Madam,

REPRESENTATION TO THE DRAFT JOINT MELKSHAM NEIGHBOURHOOD PLAN CONSULTATION DOCUMENT ON BEHALF OF CREATE REAL ESTATE

This response to the consultation on the Draft Joint Melksham Neighbourhood Plan Consultation Document ["Draft Melksham NP"] is submitted by Turley on behalf of Create Real Estate ["Create"]. This response makes specific representations on land at Avonside Enterprise Park, Melksham ["the site"] shown on the location plan at **Appendix 1**.

LAND AT AVONSIDE ENTERPRISE PARK, MELKSHAM

Create's land interests is outlined in red in **Appendix 1**. It is located to the north of Melksham Town Centre. The southern boundary is the River Avon and the site is bounded to the north and east by the A3102. The site is approximately 1.1 ha in size. The site enjoys a central, sustainable and prominent location in Melksham. It is an important and connecting gateway site between Melksham train station to the north and the existing town centre to the south.

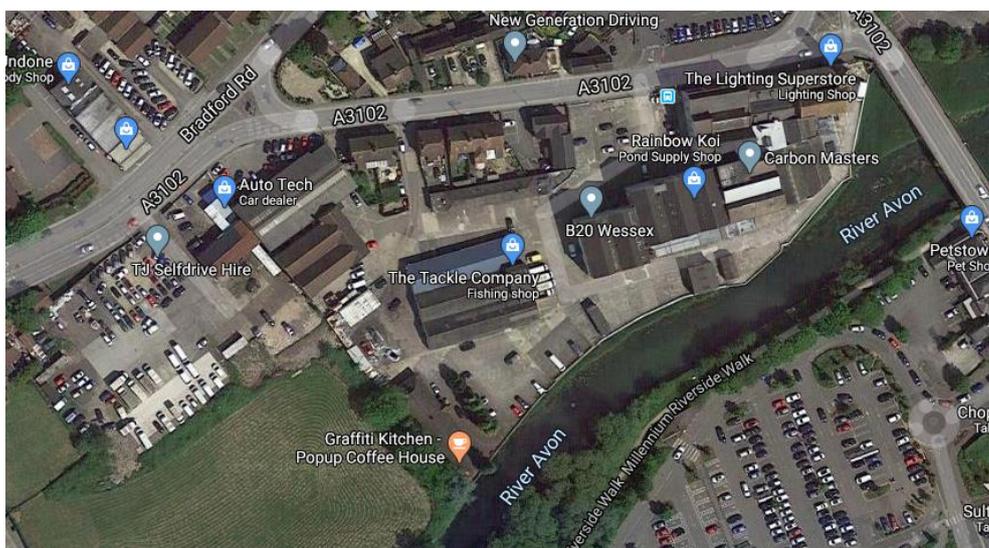


Figure 1: Google Maps Extract of Site

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The site comprises a number of existing buildings and warehouses in various conditions. Surface level car parking and a range of ancillary buildings and structures are also situated on the site. A number of buildings across the site are subject to high structural voids, leading to some parts not being in an adequate condition for occupation. The current condition of the site limits its potential, whereby only very short term leases are offered as a result. The site has been underutilised for an extended period of time and is increasingly poor in appearance. It is in need of significant investment and regeneration to maximise its potential.

The existing occupied units comprise a variety of established uses, including A1/A2 Retail, B1 Office, B8 Storage, D2 Leisure and Sui Generis use. These reflect a range of town centre uses. The table below provides a breakdown of the scale of each use on the site.

Table 1: Breakdown of Unit Uses	
Use Class	Percentage of units in this use at the site ¹
A1 – Retail	13%
A2 – Printing	2%
B1 – Business / Office / Workshop	19%
B2	0%
B8 – Storage	10%
D2 – Leisure	11%
Sui Generis – e.g. car wash	5%
Vacant	29%
Car Parking / Unknown	13%

Create has engaged in discussion with Melksham Town Council on the future of the site. It is agreed that the site has significant potential as an important opportunity for investment. Both parties consider the site to be a natural extension of the town centre and its current uses. The site's location along a main transport corridor connecting the train station and town centre, and its waterfront location along the River Avon represent a significant and sustainable placemaking opportunity for investment and regeneration.

On behalf of our client, we set out below responses to the Draft Melksham NP. The representations aim to contribute to the discussion around town centre regeneration, expansion and employment. The site is a sustainable opportunity to create a destination in Melksham. It is a suitable site for the expansion of the town centre. Our client would be pleased to engage with the Town Council, Neighbourhood Plan team and Wiltshire Council on these matters in the coming months.

¹ Based on tenant data available at June 2020. Rounded up to whole numbers.

DRAFT POLICY 9: TOWN CENTRE

The current town centre boundary, as shown in Figure 9 of the Draft Melksham NP is immediately adjacent to, but not inclusive of, the Avonside Enterprise Park site. As drawn, the site would constitute an edge of centre location.

Draft Policy 9 of the Draft Melksham NP seeks to protect and enhance the town centre. The policy recognises the potential for town centre expansion and is supportive of redeveloping employment sites, stating:

“Proposals for the redevelopment of existing employment uses within edge of centre locations must be considered on the basis of their relationship to the existing town centre and the potential to expand the town centre.”

The Draft Policy also commits to the preparation of a Town Centre Masterplan to guide future town centre development. The draft policy wording states that proposals within 300m of the existing boundary will need to demonstrate how they contribute to delivering the vision and objectives.

Whilst our client is supportive of the draft policy, it is considered that the site represents an important opportunity for inclusion within the town centre boundary. Including the site in the town centre boundary would represent positive and aspirational planning for the sustainable future of Melksham.

The site represents an appropriate location for town centre expansion for the following reasons:

- It is located immediately adjacent to the existing town centre boundary. Its inclusion would be a natural and logical extension to this boundary, reinforcing the connection and relationship between the north and south of the River Avon. It would bring the river into the heart of the town centre.
- The Enterprise Park represents an important Gateway Site for Melksham. Over time, a mix of town centre uses have been established on the site as a result of its location. The mixed use site is a destination in the town. It has the potential for transformational regeneration as an anchor destination in an expanded town centre.
- The role of the site as a connecting node between the train station and existing town centre makes it an integral element of achieving Draft Policy 11 (Sustainable Transport). The site will encourage investment in and improved connectivity between the station and the centre of Melksham.
- Sustainable transport options and ease of accessibility are already established at the site. A bus stop is located along the site's northern boundary, immediately adjacent to the existing vehicular access and egress point on the A3102. The site is within easy walking and cycling distance of the town centre and Melksham train station. This presents a significant opportunity for encouraging a wider range of uses, reflective of a town centre nature.

The site's riverside location represents an important opportunity for enhancing connectivity to, and the vitality of, the town centre. Such a prominent and desirable location has significant potential for expanding the existing centre. The site provides an opportunity for maximising density and providing active frontages supported by a mix of uses at the ground and upper floor levels. It also provides an opportunity for an attractive riverside public realm and open space to promote wellbeing. The site in its current form is underutilised for employment purposes. The traditional focus on B1, B2 and B8 uses has

evolved significantly. It has diminished significantly. This is evidenced in the current occupiers and number of vacant units. The site can already be deemed as part of the commercial area based on these existing uses.

A higher level of employment cannot be generated from the site unless further investment, and of the right nature, takes place. Greater flexibility is thus needed in the site's policy designation (i.e. as a town centre site rather than employment location) to support appropriate investment and regeneration that enhances the wider vitality of Melksham.

This is clear when considered against the draft policy wording for Draft Policy 10: Employment Sites. At the current time, the site would be assessed under area a) Business Parks whereby only B1, B2 and B8 employment uses are supported. If the site were included within the Town Centre boundary, the site's redevelopment would be assessed against area (b) which states:

"The appropriate redevelopment of brownfield sites within the town centre areas (shown as the Commercial Area Boundary on figure 9) involving change of use to retail, commercial and other main town centre uses falling within Classes A1, A2, A3, A4, B1, D1, and D2 of the Use Classes Order will be supported where the proposed development will generate the same number, or more, permanent full time equivalent jobs than could be expected from the existing, or any potential employment use, subject to road safety, parking and environmental considerations."

Against this policy criteria, the site will be able provide a wider range of uses. This will be vital in its ability to generate higher levels of employment, a destination use and contribute to the regeneration of the town.

Incorporating the site in the town centre boundary would maximise the positive potential for investment and regeneration.

OPPORTUNITY: REGENERATIVE BENEFITS

As noted above, the site is currently designated within the Draft Melksham NP as part of the Principle Employment Area. It is our view that this misrepresents the site's potential and overall ambition for maximising regeneration opportunities at this specific location.

Redevelopment of the Avonside Enterprise Park will bring a range of regenerative benefits to the locality and wider Melksham area, including, but not limited to:

- **Provision of mixed-use development at a central, sustainable location:** the site represents an opportunity to complement the existing surrounding town centre offer, encouraging a range of investment and employment opportunities beyond a B1/B2/B8 Use Class.
- **High quality design:** the site's riverside location presents opportunities for increased density, including maximising uses and increasing heights at a gateway location. The site can provide a high quality, distinctive, modern design which responds to existing architectural characteristics and is supported by a high quality riverside public realm. An indicative visualisation of what this may look like is provided overleaf.
- **Melksham as a destination:** the provision of complementary town centre uses at the site will encourage wider investment in Melksham as a retail, commercial and leisure destination where people can both live and work. The importance of a mix of uses, including appropriate upper

floor uses, and re-purposing the town centre to meet changing demands will become even more crucial as a result of the recent COVID-19 pandemic.



Figure 2: Indicative sketch illustrating Create’s vision for a reinvigorated Avonside

- **Achieving policy objectives:** in light of all of the above, the site’s inclusion within the town centre for mixed-use regeneration will help to achieve a range of policy priorities and objectives set out in the Draft Melksham NP, including:
 - **Draft Policy 10 (Employment) and Draft Priority Statement 3** – Many elements of the site are in poor condition and underutilised. The site is not in demand for B1 or B2 use. Investment is required to generate greater employment and growth. The site’s regeneration, as outlined above, would improve employment generation across a wider range of uses for Melksham.
 - **Draft Policy 11 (Sustainable Transport) and Draft Priority Statement 7** – the site is already served by a range of sustainable transport options, which would be strengthened and enhanced by its regeneration. It is an important opportunity for achieving further improvements and connectivity to Melksham train station, as supported by the draft policy wording.
 - **Draft Policy 18 (Design)** – the site currently comprises a mix of buildings which are in a range of conditions. There is no coherent architecture or design. The site’s regeneration is an important opportunity to provide high quality design which enhances the riverside location.
 - **Draft Priority Statement 2 (Town Centre Regeneration)** – regeneration of the site for a range of town centre uses will help Melksham to survive and thrive by adapting, in

accordance with the High Streets and Town Centres in 2030 Report² referenced in the Priority Statement. To limit the site to B Use Class employment uses only could stifle growth and investment.

SUMMARY

The site, in its current form, is underutilised. Many buildings are in a poor condition. This is preventing active occupation. The site has a range of established uses including retail, commercial and sui generis. Investment in a range of uses is required.

The site represents a significant opportunity for Melksham to expand its town centre. It can be a sustainable and accessible destination in the heart of the town. Appropriate investment and development at the site can deliver a distinctive gateway and riverside location. The extension of the town centre in this direction will improve connectivity to the centre of Melksham and train station.

Changes are required to the site's designation, primarily its inclusion within the town centre boundary for it to be appropriately assessed against the draft policies of the Melksham NP. Without this, there is risk that the current policy wording will stifle development and the site will not be brought forward in a manner which supports an adaptable town centre for Melksham.

Create is keen to engage further with both Melksham Town Council and Wiltshire Council to discuss plans for the site and its inclusion within the town centre boundary. Turley would be pleased to coordinate a meeting / call between parties at the appropriate time. Create would also welcome further opportunities to discuss and engage in the Melksham Neighbourhood Plan and wider Wiltshire Local Plan Review.

We trust this response is of use and look forward to discussing the site further with the Town Council in the coming months.

Yours sincerely



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² Department for Housing, Communities and Local Government Report: High Streets and Town Centres in 2030, February 2019

Appendix 1: Site Location Plan

