

For Official Use Only

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**Part 2 - Regulation 19 and 20 Town and Country Planning (Local Planning)
(England) Regulations 2012 "Pre-Submission LDP" consultation**

Please note that all comments on the Pre-Submission LDP consultation should be provided by completing Part 2 of this form. A separate completed Part 2 should be provided for each comment made within a representation.

2.1. To which part of the Maldon District Pre-Submission Local Development Plan (LDP) does this representation relate?

- a. Paragraph
(please specify paragraph number) _____
- b. Policy
(please specify policy reference) E 1
- c. Proposals Map _____
- d. Other section
(please specify) _____

2.2. Do you consider the Maldon District Pre-Submission LDP to be (tick as appropriate):

- a. **Legally compliant**
To be 'legally compliant' the LDP has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements. This is required by Government guidance
- Yes
- No
- b. **Sound**
To be 'sound' a Local Plan should be positively prepared, justified, effective and consistent with national policy. This is required by Government guidance
(if you do not consider the LDP to be sound, please complete section 2.3. below)
- Yes
- No

2.3. Do you consider the Maldon District LDP to be unsound because it is not (tick as appropriate):

- a. **Positively prepared**
To be positively prepared the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements
- b. **Justified**
To be justified the plan must be:
- Founded on a robust and credible evidence base;
 - The most appropriate strategy when considered against the reasonable alternatives.
- c. **Effective**
To be effective the plan must be:
- Deliverable;
 - Flexible;
 - Able to be monitored.
- d. **Consistent with National Policy**
The Plan must be consistent with Government guidance as set out within the National Planning Policy Framework

On the following pages, please explain why you think the Plan is unsound or not legally compliant, and set out any changes you feel should be made to the Plan to make the Plan sound or legally compliant.

Please note: As there will not normally be a subsequent opportunity to make further representations based on your representation at this stage, please include all the information, evidence and supporting information necessary to support/justify your representation and the suggested change(s) to the Plan. After this stage, further submissions will only be invited at the request of the Planning Inspector, based on the matters and issues the Inspector identifies for examination.

- 2.4.** If you consider the Maldon District LDP to be unsound or not legally compliant please explain why in the box below.
Please be as precise as possible. Please also use this space for any comments in support of the LDP.

See attached sheets

2.5. Please explain in the box below what change(s) you consider necessary to make the Maldon District LDP legally compliant and sound.

Please be as precise as possible. Please explain why this change will make the Maldon District LDP legally compliant and sound. It will be helpful if you are able to put forward any suggested revised wording of the policies or supporting text.

See attached sheets

2.6. Do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination

2.7. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

The objections made go to the heart of the plans proposals for the District and Burnham-on-Crouch and so we wish to ensure that the Inspector understands our objections.

This is the end of Part 2 (Regulation 19 and 20) of the response form. Please complete this form for each representation you wish to make. You only need to complete Part A once. Please submit all of your response forms together.

Objection to Policy E1

The Council has published a District level Economic Prosperity Strategy Evidence Base. This shows across the District that 11.04 hectares of new employment land is required in the Plan period. The Pre- Submission LDP proposes to allocate 8.4 hectares in Maldon and Burnham on Crouch. There is no evidence available from the Council to justify the split between the employment proposed in Burnham and Maldon and why 2.64 hectares of employment land is unaccounted for in the strategic allocations. This needs to be addressed and justified for the plan to be soundly based by being justified. The change we propose would provide flexibility in the plan.

The Council states in policy E1 that they want to create a minimum of 2,000 new jobs up to 2029. The Council's Economic Prosperity Strategy identifies that only about 25% of the employment sites in the District are high quality so new quality space will be important in attracting new jobs. The Council sets out that promoting the visitor economy is important for the Dengie peninsula.

The evidence base for the Economic Prosperity Strategy recognises that there is scope to expand the Burnham Business Park in Burnham on Crouch. Pigeon support the expansion of the Burnham Business Park. This is a well occupied business park that has a clear route for expansion to the west onto the land controlled by Pigeon. Expanding this business park will provide good opportunities for existing businesses to expand which will be very close to their existing premises. This close proximity will reduce disruption to staff or customers resulting from any move. The site for expansion of the business park has been identified by the Council as not having landscape or transport constraints. The Councils evidence base notes that the railway station in Burnham could make the town attractive for small offices. This link to the capital with attractive new employment space would make Burnham a desirable location for small businesses. When broadband speeds are improved there should be growth in office sectors and other employment sectors. With the leisure and rural attractions of Burnham and the surrounding area that the Council is seeking to promote the site at Burnham West would be a good location for small business development.

The Council expects the new employment development at Burnham West to be well laid out and to provide for a range of B1, B2 and B8 uses. These uses will range from high quality

light industrial uses to high quality new offices and storage and distribution premises. Given the status of Burnham as the second largest town in the District and its role in providing for a hinterland of some 15,000 population it is important that there is sufficient employment land available for the lifetime of the development plan and beyond.

Pigeon Land Ltd is committed to delivering employment development as part of their Burnham West development and they have significant experience in developing employment sites. To create an attractive environment the new employment area will need to be well designed and landscaped with a good degree of separation between different uses to avoid conflict between for example smarter office uses and noisier light industrial uses. To achieve this attractive environment there should be flexibility in policy E1 to deliver more employment land at site E1(q) (which is the Policy E1 reference to the extension to the Burnham Business Park). This is based on advice that Pigeon have taken from John Spice Associates Chartered Surveyor. A letter confirming this advice is attached as **Appendix 1**.

We support the Council's proposal to extend the Burnham Business Park onto the land controlled by Pigeon. To be consistent with national policy, positively prepared and to provide flexibility for the range of development proposed the size of the allocation should be increased, and flexibility should be provided in policy E1 for the Burnham Business Park to be expanded further within the plan period and beyond. As part of the expansion a high quality office park with good rail access could be marketed to attract new firms to the area. The Burnham Business Park is the main area of employment development in Burnham and the Dengie peninsular. It is sensible for it to be expanded in the forthcoming plan period. It will also still be the best employment location in Burnham beyond this plan period. Therefore there is good reason to plan for a larger increase in the business park if this land is needed during the plan period the businesses will have the certainty of an allocation. If the land is not required during the plan period then it can be carried forward to the next plan period as the land is in the ideal location for employment development and this will not change in subsequent plan periods. In view of the need to increase housing numbers in Burnham the allocation should be increased by around a hectare to ensure that jobs and housing are aligned. The allocation should be expanded to 4.5 hectares. This will provide more flexibility to deliver a wider range of employment development during the plan period which is a key element of soundness. It will go further in meeting the requirements of the District level Economic Prosperity Strategy Evidence Base.

0213-5486-E1-1234

Appendix 1

JSS/TLK
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 12 March 2014

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By post and email

Dear Simon

Burnham West, Burnham on Crouch

I have been asked to comment on the proposed provision of 3.4 hectares (8.4 acres) of new employment land to the west of Burnham on Crouch (Burnham).

Maldon District Council's Economic Prosperity Strategy 2013 (?) identifies that 11.04 hectares of new employment land is required across the district in the "plan period" up to 2029, of which 8.4 hectares is to be accommodated in Maldon and Burnham. The Council's aim is to create a minimum of 2,000 new jobs during its new plan period for the district.

The Economic Prosperity Strategy acknowledges that only about 25% of the employment sites in the District are considered to be of a high quality. As such it is fundamental that there is the provision of new high quality employment sites being brought forward to meet occupiers aspirations for new, efficient, cost effective working environments during the plan period and beyond.

The Economic Prosperity Strategy recognises that there is scope to expand the Burnham Business Park by the 3.4 hectares currently proposed by the Council in its emerging Local Plan. This will provide an opportunity for:

- Existing businesses within Burnham to expand
- Existing businesses in the District, particularly in the Peninsula, to relocate to Burnham
- New businesses to locate to Burnham

The Council's Economic Prosperity Strategy evidence base notes that the railway station in Burnham has the potential to make the town attractive for a range of office occupiers. This link to the Capital with attractive new employment space could make Burnham a desirable location for both small businesses and as a destination for larger companies to relocate. With the onset of faster broadband speeds there is clear potential for the growth in the office sector. The leisure and rural attractions of Burnham and the surrounding area would also make the town a good location for small business development. Such businesses would also require new office accommodation.



Because property matters

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 trading as Spice Property Consultants

Burnham West, Burnham on Crouch
12 March 2014
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As well as the provision of new office accommodation the Council expects the new employment development at Burnham West to also provide for a range of B1 (light Industrial), B2 and B8 uses. These uses will range from high quality light industrial uses to high quality storage and distribution premises.

Given the status of Burnham as the second largest town in the District, and its role in providing for a hinterland of some 15,000 population, it is important that there is sufficient employment land available, suitable for the delivery of buildings that occupiers demand today, for the lifetime of the development plan and beyond. To this end it is considered that the current provision should be increased to:

- Increase greater flexibility of provision
- Recognise the role of the site as the only employment opportunity of its type in Burnham and the Peninsula
- Cater for a wider range of employment opportunities
- Ensure that the design of the new provision can appropriately cater for the range of uses it may need to accommodate
- Enable the design of the new provision to be of a high quality for its varied uses
- Provide more certainty to the delivery of a minimum of 11.04 hectares for the district during the plan period
- Provide the potential for a new Civic quarter for the town
- Allow for a critical mass of employment providers which in turn may provide sufficient financial resources to bring forward appropriate training opportunities in the town
- Ensure that the provision of new employment land is brought forward during the plan period and beyond

In light of the above it is suggested that the proposed provision of 3.4 hectares (8.4 acres) of new employment land to the west of Burnham should be increased to around 5 hectares.

Yours sincerely



John S Spice BSc MRICS
Spice Property Consultants