

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies Issues and Options

Issues & Options Topic Paper 3: Employment – November 2013

Background

- 1.1 The Introductory Topic Paper (1) provides the context and background to the preparation of the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document. Once adopted, the Local Plan Part 2 will form part of the statutory development plan for the area and will be used as a basis for determining planning applications in that part of the District outside of the National Park.
- 1.2 The aim of this consultation is to set out the emerging work on the Local Plan Part 2 and to seek the views of the public and key stakeholders before any firm decisions are taken by the Council. The consultation will last **8 weeks**, running from **22 November 2013** to **17 January 2014**. At the end of this Topic Paper, there are a number of questions that we are keen for individuals and organisations to respond to. Details on how to comment can also be found in this section of the document.

Purpose of this Topic Paper

- 1.3 Building upon the strategic context set in the Core Strategy, the purpose of this topic paper is to identify current issues relating to employment activity in the District and set out a number of policy options that could have the potential to encourage economic development and regeneration providing economic growth, jobs and wider prosperity.
- 1.4 These positive outcomes are key objectives highlighted in both the Proposed Submission 'Joint Core Strategy', the background of which is set out in Topic Paper 1, and the Regeneration Strategy for Lewes District 'Building a brighter future'¹.
- 1.5 This topic paper will only be looking at policy options for consideration in the areas of the district that lie **outside** of the South Downs National Park designation. The SDNPA is currently producing its own Local Plan, which will address employment issues for those areas that fall within the Park. Further information can be found on the Park's website (<http://www.southdowns.gov.uk/>).
- 1.6 The District Council will also be working closely with those parishes engaged with neighbourhood planning, who may decide to include

¹ This publication can be accessed on the Lewes District Council website http://www.lewes.gov.uk/Files/plan_regeneration_strategy_2012-15.pdf

employment site allocations within the Neighbourhood Plans that they are preparing. This will ensure that the community led plan and Local Plan Part 2 are aligned, so far as possible. Town and Parish Councils that are preparing Neighbourhood Plans that are partially or wholly outside of the SDNP are Ringmer, Hamsey, Newick, Newhaven, Peacehaven with Telscombe and Wivelsfield.

- 1.7 Further evidence is being sought which will consider the viability of existing employment site allocations adopted in the Lewes District Local Plan 2003 and planning permissions with an existing approval. This will inform the next round of consultation of Local Plan Part 2 anticipated to take place in summer next year.
- 1.8 Current site allocation options are set out in appendices to this topic paper and include; site allocations previously identified in the 2003 Lewes District Local Plan at appendix 1, sites submitted from a recent 'call for sites' exercise carried out in Spring 2013 set out at Appendix 2 and sites identified as within the Ringmer Neighbourhood Plan for employment use at appendix 3.

2. Employment Policy Context

- 2.1 The Core Strategy sets the high-level strategy for promoting sustainable economic development in the district. This strategy is very much in accordance with the National Planning Policy Framework and reflects the findings from the evidence collated by the District Council and National Park Authority (in particular the Employment and Economic Land Assessments).
- 2.2 It is recognized in the Core Strategy that detailed policies in the Site Allocations and Development Management Policies document, as well as the SDNPA's own Local Plan, will be needed to add to and supplement these higher level policies in order to ensure an appropriate policy framework is in place for this important policy area.
- 2.3 The Spatial Strategy, as contained within the Core Strategy, identifies the relatively modest employment land needs for the plan period (2010 to 2030). It also identifies the potential supply of employment land, either through sites that benefit from existing permissions, or allocations that are yet to be implemented. This potential supply is seen as sufficient, in quantitative terms, to meet the current projected needs for the plan period as set out in the table below.

Proposed Use	Gross floorspace requirement identified	Existing potential supply ²	Residual requirement
Industrial B1c/2/8	60,000	69,000	0
Office B1a	14,000	16,900	0
Total	74,000	86,400	0

Table 1- Employment floorspace requirements (to meet a quantitative need) set out in the Proposed submission Joint Core Strategy

- 2.4 However, this does not present the full picture. Core Policy 4 has a presumption in favor of retaining the unimplemented employment land allocations from the Local Plan (2003), but does identify the need to review these allocations in the Site Allocations and Development Management DPD (or the SDNPA Local Plan). The policy states that “if there are clear economic viability or environmental amenity reasons for not doing so [retaining the allocation] then such sites will be de-allocated or considered for alternative uses”. This topic paper starts this process of undertaking such a review.
- 2.5 Obviously, if it is eventually decided to de-allocate or seek alternative uses on a number of potential employment sites, it could result in the reduction of the potential supply with the required employment land needs for the full plan period not being available. Should this be the case there will be a need to identify new employment land allocations in the district. This paper therefore, considers such site options in the event that additional sites are required.
- 2.6 Although not integral to the delivery of the overall spatial strategy, Core Policy 4 does encourage and support the provision of small, flexible, start-up and serviced business units in the district. An existing example of such a facility can be found at the Enterprise Centre in Newhaven and the Employment and Economic Land Assessments identify the potential for such a facility (perhaps on a smaller scale) to be delivered elsewhere in the district (Seaford and Peacehaven in particular were highlighted as potential locations). Where known, site options for the delivery of such facilities are also identified in this paper.
- 2.7 Core Policy 4 also identifies support that will be directed to the delivery of onshore infrastructure and support services for the Rampion

² The supply figures are taken from the 2012 update of the Employment and Economic Land Assessment and indicates the ‘worst case’ for supply on the basis that certain sites are discounted from this potential supply due to significant constraints on development. The supply figures are as at June 2012.

offshore windfarm. This may include identification of land that supports the possible assembly base, as well as the operations and management base.

3.0 Options for consideration

- 3.1 The employment sites being considered as options in this topic paper come from; unimplemented employment site allocations from the Lewes District Local Plan (2003); call for sites exercise carried out Spring 2013 and sites identified through the neighbourhood planning process carried out by Ringmer Parish Council.
- 3.2 The sites being consulted upon apart from those within the proposed Ringmer Neighbourhood Plan have been subject to an initial filter³. The filter ensures that employment sites which are fundamentally unsuitable for further consideration or allocation on the grounds of environmental protection are removed.
- 3.3 The employment sites for Ringmer are identified as options, on the understanding that any sites taken forward as part of the District Council's Part 2 document are considered as *contingency* sites, should the Ringmer neighbourhood plan not be progressed, fail at examination or referendum.

4.0 How to respond to this topic paper

- 4.1 This is your opportunity to have your say about the delivery of employment development in the District. The Council would appreciate and value any comments you have on this or any of the Topic Papers. Questions are set out below and you need only reply to those questions that are of interest to you, or you may introduce other ideas.
- 4.2 The closing date for any comments, and additional site submissions, is **midnight Friday 17 January 2014**.

Email to: ldf@lewes.gov.uk

Fax to: 01273 484452

Post to: Lewes District Council
Planning Policy Team
Southover House
Southover Road
Lewes
BN7 1AB

³ Site is: Within an international or national designation (SSSI, SAC, SPA, and National Park for purposes of coverage of Site Allocations document).

Consultation Questions

Question (a)

Should any the sites taken from the Local Plan 2003 in Appendix 1, be de-allocated through the Site Allocations Document and be identified for an alternative use? It would help us if you could what you think the new use should be and why you think this.

Question (b)

Are there any site options that you would not wish to see allocated for employment use? Please explain why you think this.

Question (c)

Do you know of any sites that have not been included in this topic paper that may be suitable for employment use?

Question (d)

Do you think it would be beneficial to cluster employment uses (such as light industrial/offices) together with other uses such as housing, retail or leisure?

Appendix 1 – Site Allocations for employment use in 2003 Local Plan

The sites identified in the table below were allocated in the Local Plan 2003 and remain undeveloped from this time. The reasons for their non-delivery may be varied and numerous, including high development costs making the scheme unviable, the site being in an unsuitable location, or aspirations of the landowner for alternative uses. Further information on each of these sites is provided in this appendix.

As well as the existing evidence base, information collected through the consultation on this paper will hopefully identify such issues. In addition, the further evidence work to be undertaken will also hopefully identify any particular issues that have led to the non-delivery of these sites.

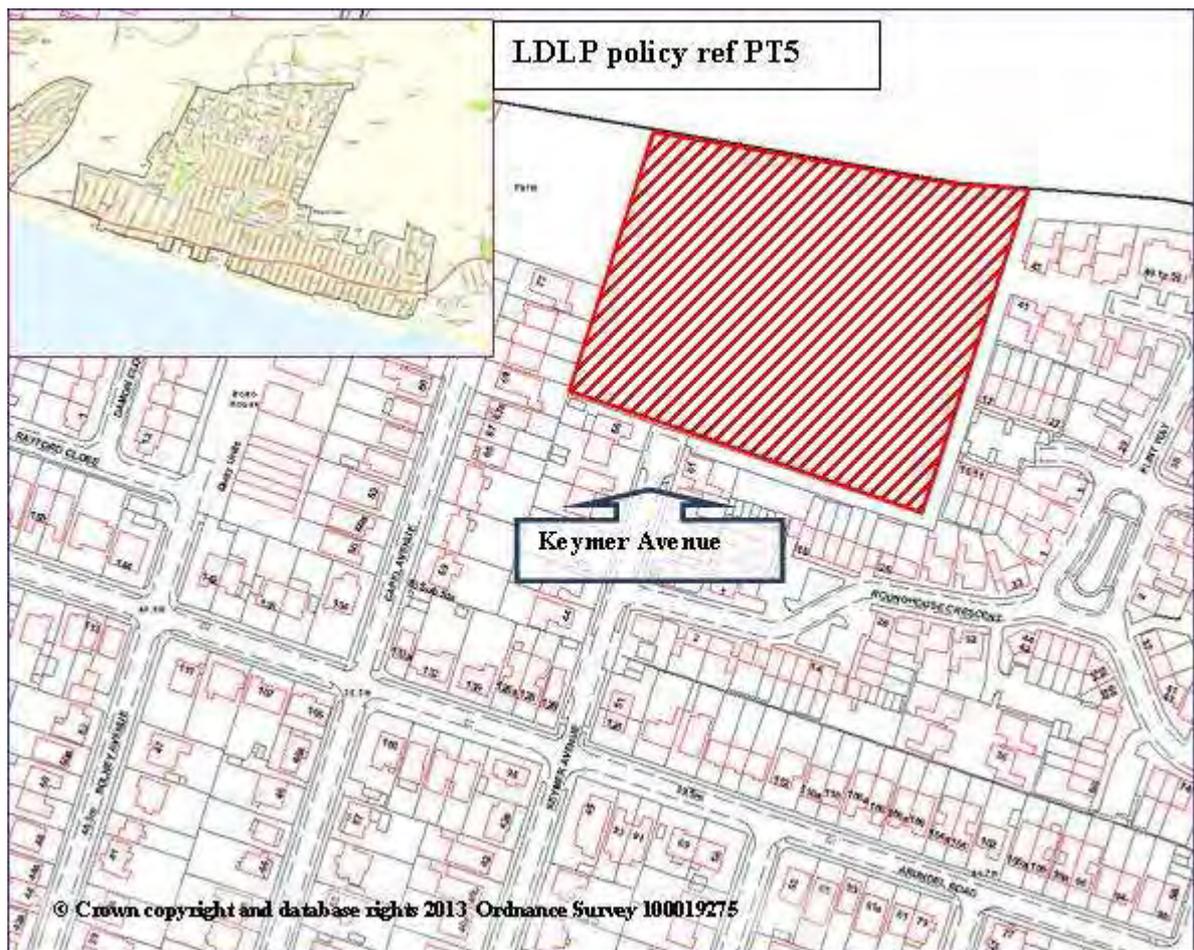
It is recognised that some of the sites listed benefit from a current extant planning permission (in some cases an alternative use to what the site has been allocated for). In such cases it is still considered important to consider and review its associated Local Plan policy in the event that the permission expires and is not implemented.

Site ref	Site Address	Planning Application/s submitted
1	Land north of Keymer Avenue, Peacehaven	None recent
2	Land at Hoyle Road, Peacehaven	LW/11/0490 Renewal of existing planning approval LW/08/0006 for erection of 24 industrial units (B1use) in two phases with temporary access to first phase from Hoyle Road and permanent access from proposed link road.
3	Cradle Hill Industrial Estate, Seaford	None recent
4	Balcombe Pit, Glynde	LW/12/0763 Section 73A Retrospective application for continued use of premises for car and light vehicle general repairs in a permanent basis - Approved
5	Chailey Brikworks	None recent
6	Hamsey Brickworks, South Chailey	None recent
7	Woodgate Dairy, Sheffield Park	LW/13/0490 - Change of use from sui generis use to B1 (business) / B2 (general industrial) and B8 (storage & distribution) across all units and retention of 24/7 use - Pending

Site 1	Land North of Keymer Avenue, Peacehaven	Site Area	1.3ha
Existing Policy context	Local Plan 2003, Policy PT5 – Allocation for business and office use under use class B1	Existing/ Previous Use	Greenfield Site - grassland
Relevant notes	Site access through residential streets with traffic calming measures. Residential uses to south, east and west. Public open space to the north. Allocated for 10 years without development. Proximity to residential could constrain some industrial operations		

Options

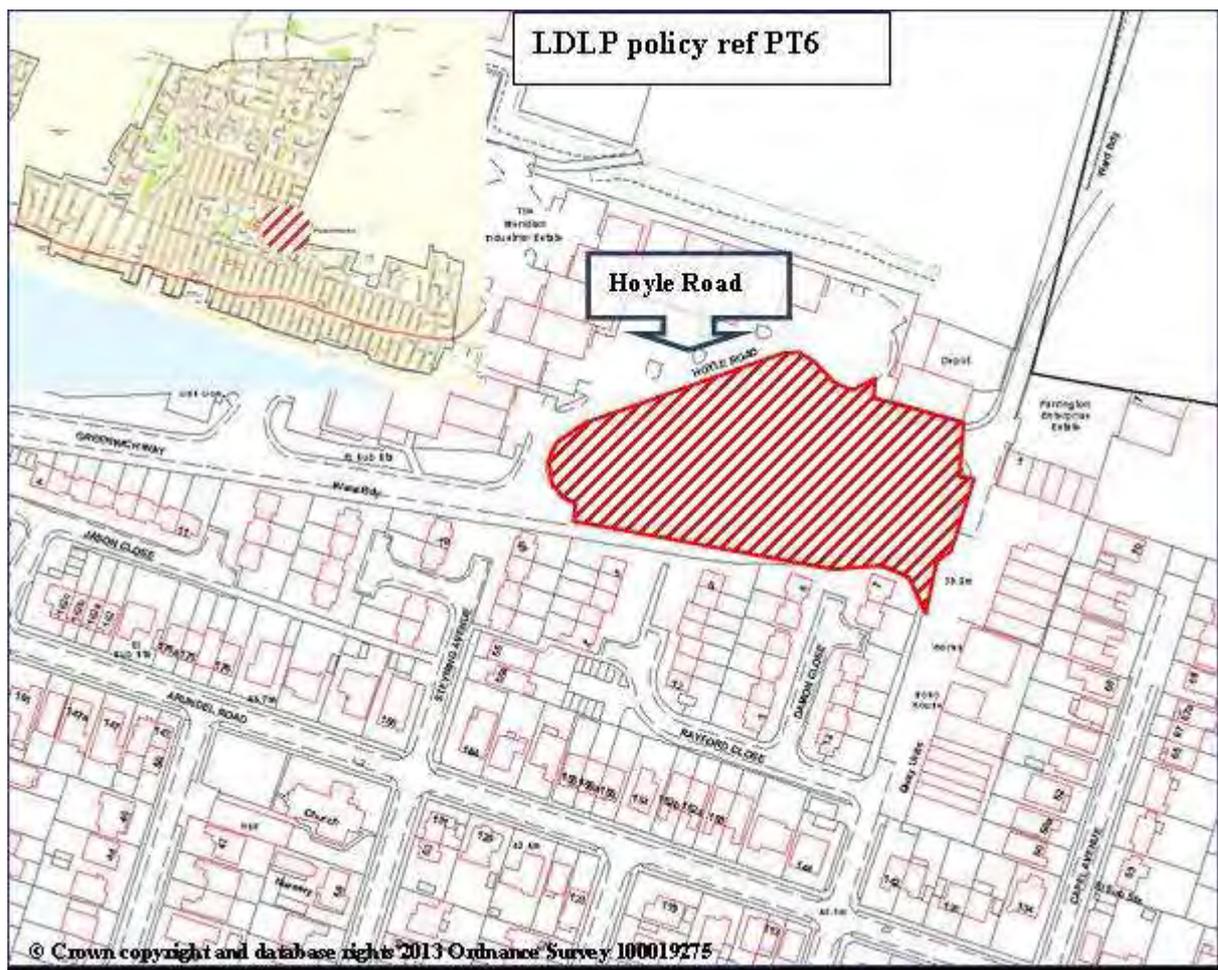
- *Retain site for business use*
- *De-allocate site*
- *Re-allocate for an alternative use (e.g. housing), or a mixed-use scheme (e.g. business and housing)*



Site 2	Land at Hoyle Road, Peacehaven	Site Area	0.6ha
Existing Policy context	Local Plan 2003 Policy PT6 – Industrial or Warehouse (B1 and B8 uses), link road (Hoyle Road to Bolney Avenue)	Existing/ Previous Use	Greenfield
Relevant notes	Existing policy also requires that two units should be capable of being subdivided into units of no more than 400sq.m in order to nurture new business in the town.		

Options

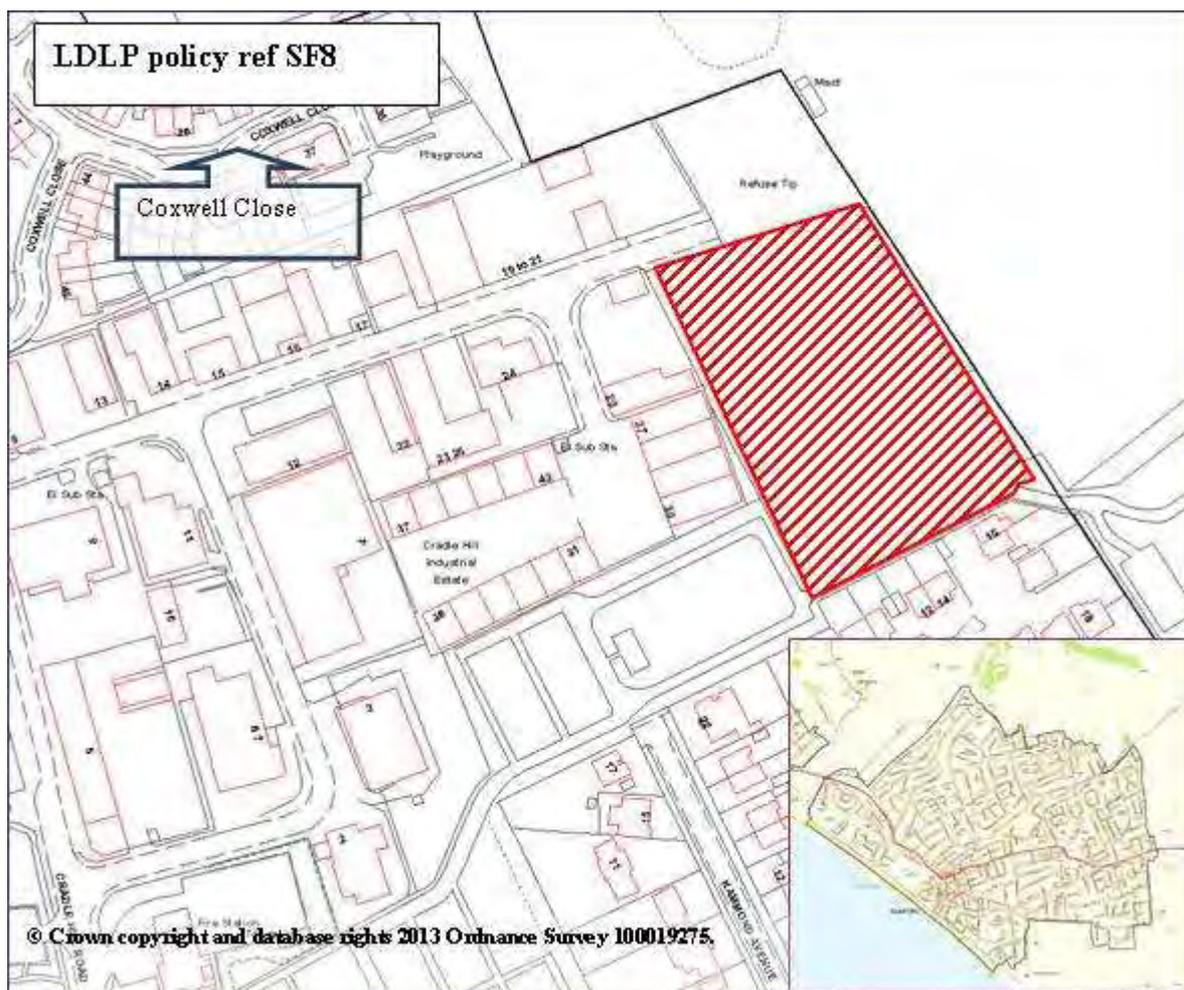
- **Retain site for business use**
- **De-allocate site**
- **Re-allocate for an alternative use (e.g. housing), or a mixed-use scheme (e.g. business and housing)**



Site 3	Cradle Hill Industrial Estate	Site Area	0.85ha
Existing Policy context	Local Plan 2003 Policy SF8 – Industrial Use (B2 and B8)	Existing/ Previous Use	Vacant grass scrubland
Relevant notes	Expansion of existing industrial estate would provide suitable premises for new businesses and expansion of existing. Land has been vacant and undeveloped for over 5 years. Employment uses to north and west and housing to the south. Employment and Economic Land Assessment suggests new units would be attractive to market given low vacancy in adjacent industrial estate.		

Options

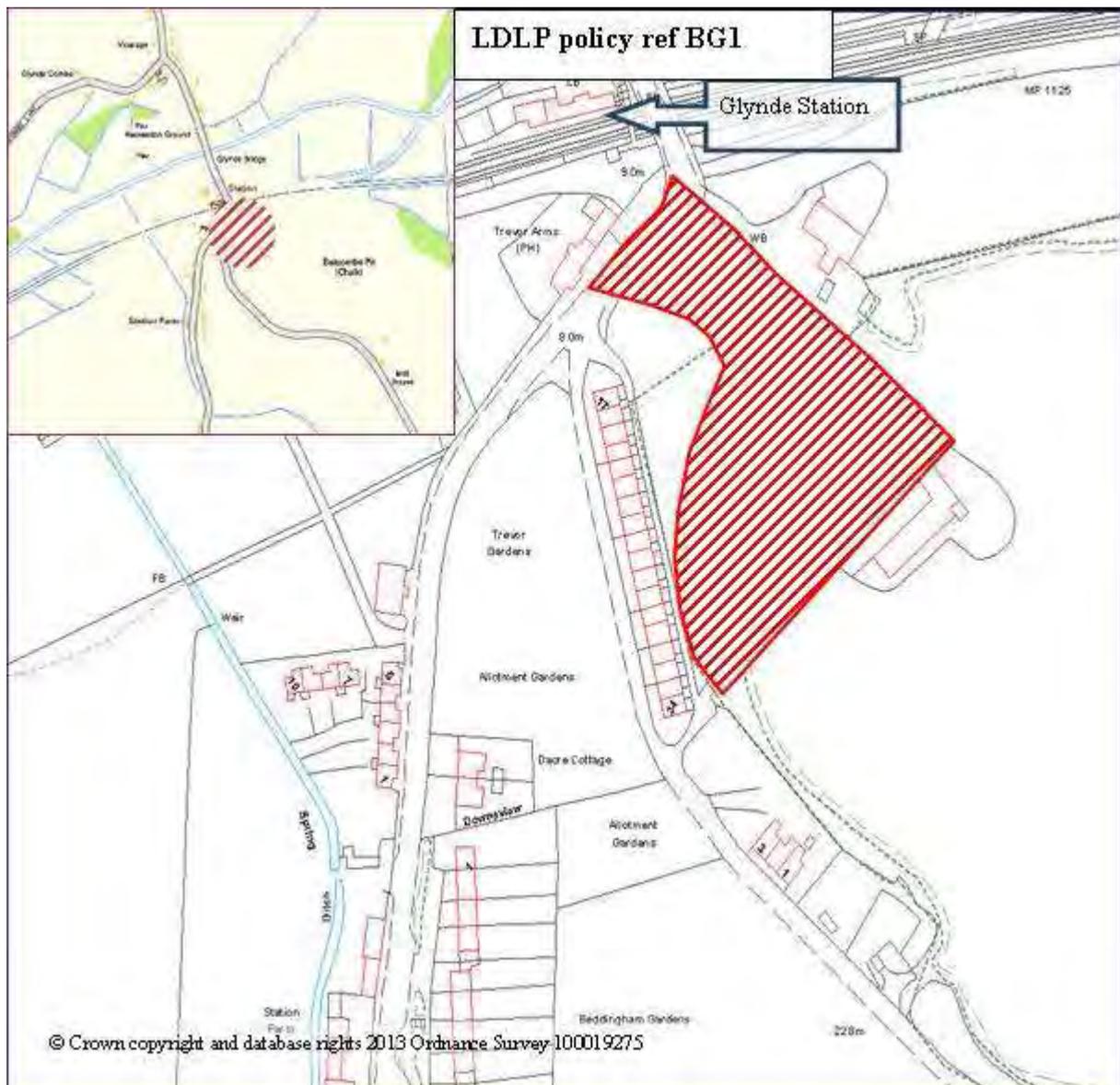
- *Retain site for business use*
- *De-allocate site for business use*
- *Re-allocate for an alternative use (e.g. housing), or a mixed-use scheme (e.g. business and housing)*



Site 4	Land at Balcombe Pit	Site Area	0.6ha
Existing Policy context	Local Plan Policy 2003, Policy BG1 - Industrial - B1 & B2	Existing/ Previous Use	Part B2 (General Industrial), Part Vacant former chalk pit
Relevant notes	. Vehicular access on tight bend which reduces turning visibility. Occasional rail and bus public transport. Adjacent to small village of Glynde and small labour force. Part of site in National Park. Existing employment use has a low profile with run down appearance. Adjacent to area of Arcaeological Interest and Conservation Area		

Options

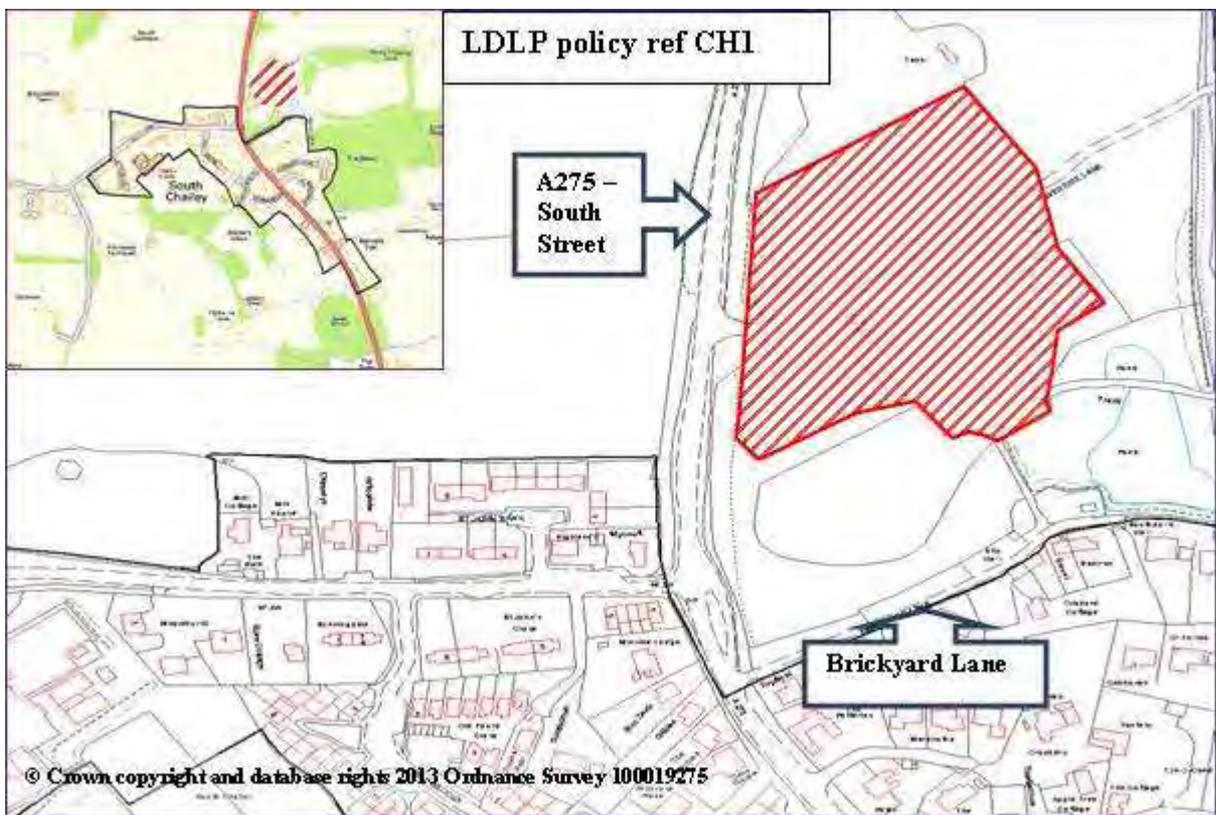
- **Retain site for business use**
- **De-allocate site**
- **Other uses?**



Site 5	Chailey Brickworks	Site Area	1.95 ha
Existing Policy context	Local Plan Policy CH1 Industrial – (B1 and B2)	Existing/ Previous Use	Brickworks
Relevant notes	Isolated rural location on edge of small village with limited local labour force, services and facilities. Residential use 100m to the south but mature screening. High quality landscape setting but unattractive buildings on site. Site in active use but lifespan of raw materials extracted from the site are time bound. Ground contamination issues.		

Options

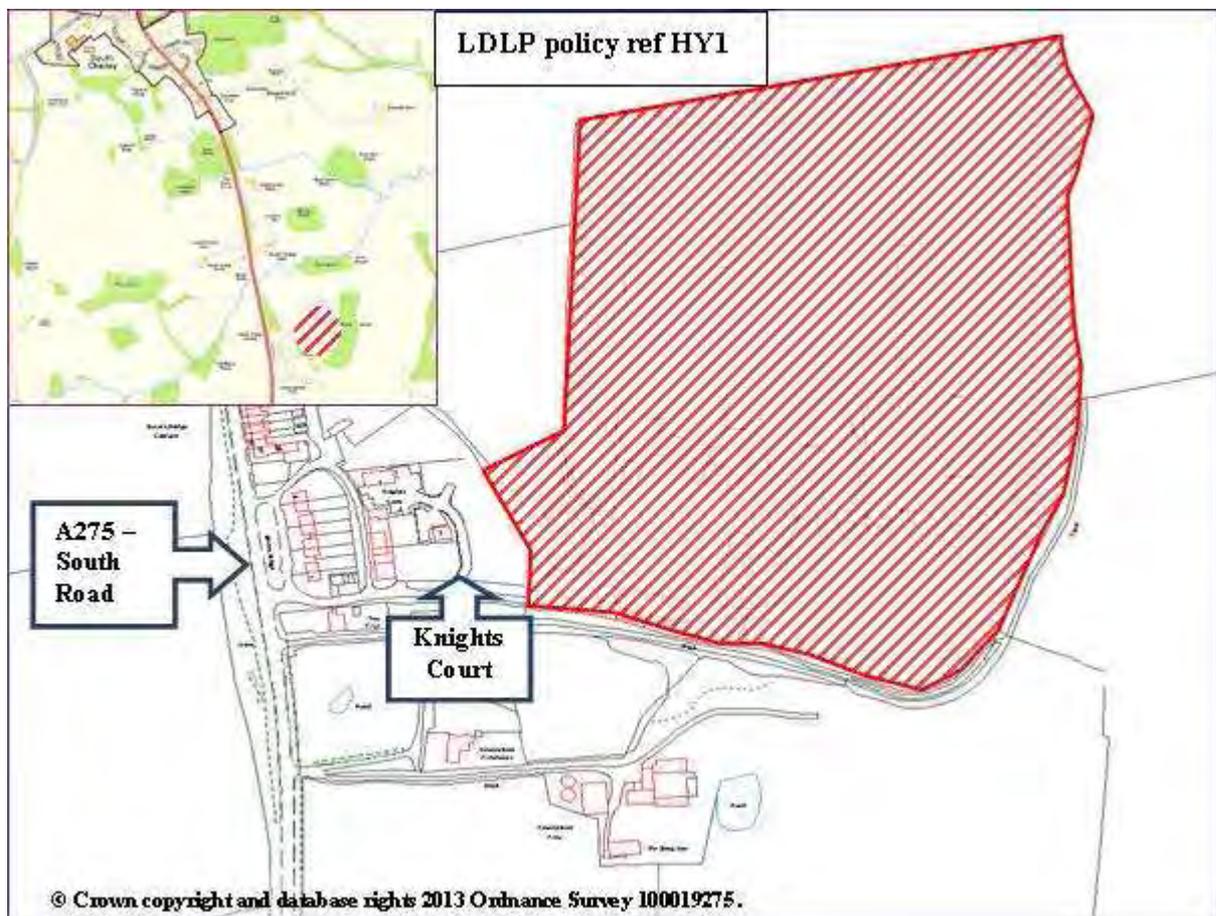
- *Retain site for business use*
- *De-allocate site*
- *Any other options?*



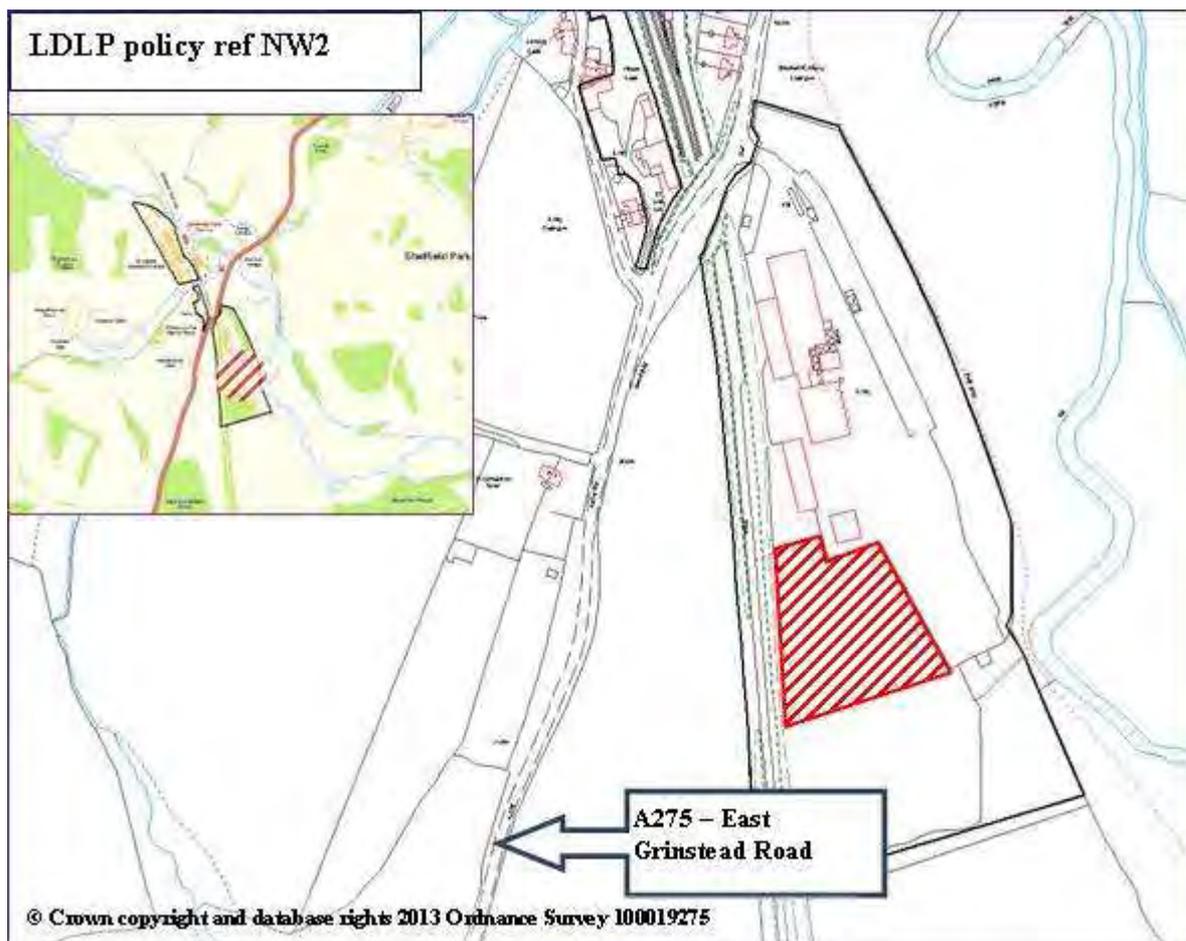
Site 6	Hamsey Brickworks	Site Area	3.8ha
Existing Policy context	Local Plan 2003 Policy HY1 – Industrial and storage) – (B1, B2 & B8)	Existing/ Previous Use	Treatment and collection of liquid wastes
Relevant notes	Unrelated to any settlement, adjacent to A275 with good visibility. Dwellings to the west within 60m. Large pond reduces site capacity by 25% and woodland by 50%. Site has poor quality buildings but sits in high quality environment.		

Options

- *Retain site for business use*
- *De-allocate site*
- *Any other uses?*



Site 7	Woodgate dairy, Sheffield Park	Site Area	1.1ha
Existing Policy context	Local Plan 2003 Policy NW2 – Industrial and storage- (B1, B2 & B8)	Existing/ Previous Use	Woodland/Scrub
Relevant notes	Planning Application under consideration. Isolated location with no public transport apart from weekend bus service serving tourist railway. Site accessed through existing employment site. Unlikely to be attractive to business market. Potential ecology and landscape issues.		
<p>Options</p> <ul style="list-style-type: none"> ▪ Retain site for business use ▪ De-allocate site ▪ Any other options? 			



Appendix 3 – Sites identified for employment development in the proposed Ringmer Neighbourhood Plan

A Neighbourhood Plan is currently being produced by Ringmer Parish Council. One of the key principles of the neighbourhood plan is to improve sustainability by enhancing local employment opportunities in a range of employment sectors. The Parish Council so far have carried out an assessment of potential new employment sites in Ringmer Parish and have consulted upon their findings in their 'Regulation 14' consultation period, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The map below is taken from the emerging neighbourhood plan and identifies the location of sites considered for employment use and development with the parish. Sites 4, 5, 6 and 10 have been considered suitable and have been identified as potential allocations for employment use in the neighbourhood plan.



Map 1 – Taken from Section 6 – Appendix 6.3 of Ringmer Neighbourhood Plan

Further details are provided on only those sites that have been considered suitable for employment use.

Address	Land South of Caburn Enterprise Park	Site number	4
Existing Policy context	Outside of current development boundary	Existing/ Previous Use	Greenfield
Comments	Strong support and little opposition from residents in 2013		

from Ringmer Neighbourhood Plan	consultations. Edge of Broyleside and adjoins existing employment site. Available for development
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Address	Former Chicken Farm, Lower Clay Hill	Site number	Site 5
Existing Policy context	Outside of current development boundary	Existing/ Previous Use	vacant
Comments from Ringmer Neighbourhood Plan	Long derelict chicken Farm, with limited business use. Minimal landscape impact but increased impact on one dwelling. Buildings for conversion available on site. Strong support and little opposition from residents in 2011-12 consultations		

Address	Former Goldcliff Nursery Site, Old Uckfield Road	Site number	Site 6
Existing Policy context	Outside of current development boundary	Existing/ Previous Use	Derelict former nursery
Comments from Ringmer Neighbourhood Plan	Current temporary planning permission for one unit. Low impact on the landscape and on neighbours. No buildings on the site. Strong support and little opposition from residents in 2013 consultations.		

Address	Farmyard at Barcombe Mills Road	Site number	Site 10
Existing Policy context	Outside of current development boundary	Existing/ Previous Use	Farm yard
Comments from Ringmer Neighbourhood Plan	Limited impact on the landscape and neighbours. Buildings for conversion available on site. Part of the site has planning permission, unimplemented except for one unit approved in 2013. Strong support and little opposition from residents in 2011-12 consultations. Surrounded by highly significant archaeological site, identified 2012.		