

## **Core Strategy Issues and Emerging Options Topic Papers**

# **POSSIBLE STRATEGIC DEVELOPMENT SITE AT NORTH STREET, LEWES**

### **Background and Aims**

The Introductory Topic Paper provides the background to the Local Development Framework (LDF), the progress made on the Core Strategy for Lewes District to date and how the content of all the Topic Papers has been formulated. This included engagement with District Councillors and representatives from Town and Parish Councils.

The aim of this consultation stage is to present the emerging work on the LDF Core Strategy and to seek the views of the public and key stakeholders on the various elements of this work. The consultation period will last **8 weeks**, running from 21st May 2010 to 16 July 2010. At the end of this paper, there are a number of questions that we are keen for individuals and organisations to respond to. Details on how to respond can also be found at the end of this paper.

### **Purpose of this Topic Paper**

Topic Paper 4 sets out a number of draft strategic planning objectives for the LDF Core Strategy, which will need to be incorporated into a deliverable spatial strategy for the period up to 2026. A key element of this spatial strategy will be identifying how and where growth will take place across Lewes District. This will include housing, employment, retail, transport infrastructure, recreational facilities and all other community services and facilities.

Due to the strategic nature of the LDF Core Strategy, only a broad, high-level, approach to how growth will be distributed will be set out in the document. The emerging strategic options for development are set out for comment in Topic Paper 5. When an overall planning strategy for Lewes District has been agreed through the LDF Core Strategy, most of the specific sites for new development will be identified through a "Site Allocations Development Plan Document" or through Action Area Plans.



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An exception to this would be if the Council wishes to identify a “strategic development site” through the LDF Core Strategy. Government guidance in PPS 12 defines such sites as those “central to achievement of the planning strategy” for the area. Whilst no decisions have yet been made on the planning strategy for Lewes District, two potential strategic development sites have emerged from work so far. These are:

- North Street, Lewes
- Eastside, Newhaven

The purpose of this Topic Paper is to provide background on the North Street site and to invite comments on some strategic development options for its future.

Consideration of these **strategic development options** for the North Street area will depend not only on the views we receive on them, but also on detailed technical work completed, or still being prepared, for the LDF Core Strategy. All of this will give us the necessary evidence base to show that any LDF proposals are sustainable, realistic, relevant and deliverable. Such work includes:

- Strategic Housing Land Availability Assessment (in preparation: expected completion – July 2010)
- Employment Land Review (in preparation; expected completion in July 2010)
- Retail Study (Completed April 2005: to be updated in light of new Government guidance)
- Strategic Flood Risk Assessment (completed October 2009)
- Climate Change, Renewable Energy and Low Carbon Development (in preparation; expected completion: August 2010)
- Green Infrastructure (recreation, open space and nature conservation) (in preparation: expected completion December 2010)
- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of all development options (in progress)

### **The North Street site**

The North Street site is located immediately to the north-west of Lewes town centre (see aerial photo on the following page) and has an extensive river frontage extending from Phoenix Causeway up to Wiley’s Bridge. Its total area is approximately 7.5HA (or 18.5 acres). The site adjoins the Lewes Conservation Area. The whole town is included within the designated South Downs National Park.

The site was occupied by the former Phoenix Ironworks from the 1830’s onwards. It was later redeveloped in the 1950s and 1960s for a range of industrial and warehouse buildings, providing a base for many local businesses. The site was badly flooded in October 2000, retarding investment in the area, and leading to some buildings becoming run down and vacant, and less able to meet the needs of modern businesses.

From around 2003 onwards, the site became the focus of a major redevelopment proposal led by Angel Properties Ltd/Terracotta Properties Ltd. The developers began to assemble land into their ownership and to draw up a scheme for clearance and redevelopment.





The North Street area:  Indicative boundary of possible strategic site

Their proposals involved a mixed use development comprising high density housing (mainly apartments), retail and office development, car parking, cinema, cafes/restaurants, riverside walkway and a footbridge over the river to Tesco. The proposal included protection of the development site, and some adjacent areas, by upgraded flood defences.

Although the developers gradually assembled most of the land on the east side of North Street, significant areas on the west side of North Street remain in the ownership of Lewes District Council (albeit, much of it let on long leases to local businesses) and the Town Brooks Charity (administered by Lewes Town Council). The District Council's policy, as landowner, is that it will not sell any land, or grant any interest in its land, until the LDF has been through full public consultation and the future of the area decided through the statutory planning process. The District Council would require that any proposals affecting land in its ownership were financially viable and sustainable.

The Angel/Terracotta proposals, which they called the "Phoenix Quarter", were the subject of three public exhibitions between 2005 and 2008, as their development package was gradually worked up in more detail.

In parallel, the District Council convened a Technical Group – involving LDC officers, the developers and their professional advisers, and officers of the County Council, Housing Associations, Environment Agency, English Heritage and ATLAS (The Advisory Team on Large Applications) – to discuss technical issues arising from the development proposals and the work necessary to support a planning application. This Group met on 14 occasions between December 2006 and May 2008. The District Council also held three "stakeholders workshops" early in 2007, at which a "planning vision" for the future of the area, and broad development options, were discussed.

Angel/Terracotta began putting together a planning application, and all necessary supporting documentation, for the "Phoenix Quarter" proposals during 2008 with a view to a formal submission by the end of that year.





However, a formal application was never lodged and their development proposals were overtaken by the dramatic downturn in the property market brought about by the “credit crunch” in autumn 2008. Angel/Terracotta went into administration in 2009.

Since Angel/Terracotta emerged with large scale development proposals, the future of the North Street area has been the subject of intense debate in Lewes. Several local groups have been formed specifically to oppose the Phoenix Quarter proposals, or to campaign for a completely different approach to the future of the site. These groups continue to campaign, despite the demise of the Angel proposals. The LDF offers an arena for all concerned to have a say on development of statutory planning policies to guide the future of the site.

### Strategic planning options for the site

The workshops early in 2007 (see previous section) identified the following strategic planning options for the site:

- A** – *To retain the North Street area for employment use, upgrading and redeveloping the existing buildings for employment use as opportunities arise (This is our current policy in the Lewes District Local Plan). No upgraded hard flood defences would be provided.*
  - B** – *Comprehensive redevelopment to create a new neighbourhood for the town, with a mix of housing, employment and other uses, which is able to generate sufficient value to provide all necessary supporting infrastructure, including upgraded hard flood defences.*
  - C** – *Clearance of the existing buildings from the area and utilising it for flood storage and/or low key uses such as open space or surface car parking. In effect, this restores the flood plain in this location. No upgraded hard flood defences would be provided.*
- Discussions with the Lewes Community Land Trust in late 2008/early 2009, led to identification of a fourth strategic option, which brings together elements of A, B and C above.
- D** – *Restore some of the flood plain, but allow an element of flood resistant and flood resilient development in selected, lower risk, locations within the site and integrate this with a wider package of flood risk management measures both on-site (e.g. open landscaped areas) and off-site (e.g. managing surface water drainage). No upgraded hard flood defences would be provided.*

It will be apparent that, with this flood plain site, consideration of flood risk issues, using the national guidance in PPS25 “Development and Flood Risk”, will be a key factor in assessing, and choosing between, the various strategic planning options. The Strategic Flood Risk Assessment for Lewes District, completed in October 2009, will assist in this task, particularly application of the “sequential” and “exceptions” tests required by PPS25.



**Table I: North Street: Preliminary Assessment of Strategic Options**

Strategic Option	Potential Advantages	Potential Disadvantages	Further work required
<p><b>A</b> – Retain the North Street area for employment use, upgrading the existing buildings for employment use as opportunities arise. No upgraded flood defences would be provided.</p> <p><b>B</b> – Comprehensive redevelopment to create a new neighbourhood for the town, with a mix of housing, employment and other uses, which is able to generate sufficient development value to provide all necessary infrastructure, including upgraded flood defences.</p>	<p>Maintains stock of cheap business accommodation. Opportunities for upgrading of business accommodation, where economically viable.</p> <p>Central site to meet future development needs in a town with little or no opportunity for outward expansion.</p> <p>Provision of upgraded flood defences to protect the site and adjacent areas (a pre-requisite of development).</p> <p>Upgrade appearance of the site and riverside areas.</p>	<p>Continued vulnerability to flood risk.</p> <p>Condition of buildings could continue to deteriorate, without investment.</p> <p>Much of the accommodation is outdated and does not meet the needs of modern growing businesses.</p> <p>Loss of cheap business accommodation and need to relocate some businesses.</p> <p>High, upfront, infrastructure costs (e.g. flood defences, road access, land decontamination) may affect viability of development.</p>	<p>Assess importance of retaining existing business accommodation on the site and scope for upgrading it (Employment Land Review)</p> <p>Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of this option</p> <p>Need for new housing, employment, retail development, and other facilities in the Lewes area (Strategic Housing, Employment Land, and Retail Studies)</p> <p>Assessment of North Street site against other potential development sites across Lewes District (Strategic Housing and Employment Land Studies, Strategic Flood Risk Assessment) including "sequential and exception tests" on flood risk.</p> <p>Viability of (a) developer-led scheme in the "post credit crunch" market (b) community-led scheme.</p> <p>Assess the headline transport implications of this option (Strategic Transport Study)</p> <p>SA and SEA of this option</p>
<p><b>C</b> – Clearance of existing buildings from the area and utilising it for flood storage and/or other low key uses, such as open space or surface car parking. In effect, this restores the flood plain in this location. No upgraded hard flood defences would be provided.</p>	<p>Addition to flood storage and small reduction in flood risk elsewhere.</p> <p>Could meet need for more car parking and recreation areas in Lewes.</p> <p>Upgrade appearance of the site and riverside areas.</p>	<p>Loss of cheap business accommodation and need to relocate some businesses.</p> <p>Practicability: who could afford to buy and clear the site for low value uses?</p>	<p>Assess importance of retaining existing business accommodation on site (Employment Land Review)</p> <p>Economic viability and realism of clearing the site for low value uses.</p> <p>Extent of any reduction in flood risk elsewhere, arising from new flood storage area at North Street (Strategic Flood Risk Assessment)</p> <p>SE and SEA of this option.</p>
<p><b>D</b> – Restore some of the flood plain, but allow an element of flood resistant and flood resilient development in selected lower risk locations and integrate this with a wider package of flood risk measures both on site (e.g. open landscaped areas) and off site (e.g. managing surface water drainage). No upgraded hard flood defences would be provided.</p>	<p>Central site to meet future development needs in a town with little or no opportunity for outward expansion, although less development possible than in Option B.</p> <p>Some addition to flood storage capacity and small reduction in flood risk elsewhere, albeit less than with Option C.</p> <p>Opportunity for slow graduated change to the area, but continued vulnerability to flooding in the meantime.</p> <p>New amenity areas, which may also assist with flood risk management.</p> <p>Upgrade appearance of site and riverside areas.</p>	<p>Some loss of cheap business accommodation and need to relocate some businesses.</p> <p>Amount of development value generated by selective redevelopment in lower risk locations, may not be sufficient to carry forward the overall project.</p> <p>Novel approach to flood risk management may not be supported by Environment Agency.</p>	<p>Need for new housing, employment, retail development, and other facilities in the Lewes area (Strategic Housing, Employment Land and Retail Studies).</p> <p>Assessment of North Street site against other potential development sites across Lewes District (Strategic Housing and Employment Land Studies, Strategic Flood Risk Assessment), including "sequential and exception tests" on flood risk.</p> <p>Economic viability and realism of this option.</p> <p>Extent of any reduction in flood risk elsewhere, arising from a new flood storage area, and any surface water drainage improvements arising from the strategy.</p> <p>SA and SEA of this option.</p>

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In addition, the other LDF work referred to on page 2 (for example, the Strategic Housing Land Availability Assessment, the Employment Land Review and the updated Retail Study) will be important in establishing the development needs of the Lewes area; the potential sites available to meet those needs; and how well the North Street area compares to other potential development sites across the District. We expect to complete that work later in 2010, but a preliminary analysis of the pros and cons of each strategic option is included in Table 1, as a prompt to debate.

Annex A to this paper outlines the existing national, regional and local planning policies relevant to the choice of a strategic approach to the future of the North Street site.

All the above work will assist in setting the strategic approach to the North Street area through the LDF Core Strategy. Once that is set, and agreed following public consultation and scrutiny by an independent Government Inspector, the Council will need to consider the more detailed planning policies for the area. This will include the access, flood risk management, building layout and design, sustainability and energy provision, and landscaping arrangements, which will be needed to deliver the chosen strategy.

**This is your opportunity to shape your local area, and comment upon how the District develops over the next 15 years. The Council would welcome any comments you have on this document, particularly the following issues arising from this Topic Paper:**

- *Should the North Street area be considered as a “strategic site” which will influence the overall planning strategy for Lewes District?*
- *Do you have any views on the four strategic options for the North Street area (Options A–D)?*
- *Have we correctly identified the main pros and cons of each strategic option in Table 1?*
- *Do you have any information, relating to the options identified, that could assist the Council in the appraisal process?*
- *Are there any other strategic options for the North Street site, which have not been identified, which the Council should be considering and appraising?*

## Obtaining additional copies of the Issues and Emerging Options Topic Papers

Downloading it from **[www.lewes.gov.uk/corestrategy](http://www.lewes.gov.uk/corestrategy)**

Emailing **[ldf@lewes.gov.uk](mailto:ldf@lewes.gov.uk)**

Visiting Lewes District Council at Southover House

Telephoning the Planning Policy Team on **01273 484417**

## How to respond to the Core Strategy Issues and Emerging Options Topic Papers

Views are invited to the questions that are located at the end of each of the Topic Papers. You need only reply to any part of the questions that are of interest to you, or you may introduce other comments.

### Comments may be sent to the Council by:

By email to: **[ldf@lewes.gov.uk](mailto:ldf@lewes.gov.uk)**

By fax to: **01273 484452**

By post to: Lewes District Council

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***Comments must be received by the 16th July 2010***

# LDF

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## Annex A – Key policies and influences relating to the North Street site

### National planning policy

#### Planning Policy Statement (PPS) 3: Housing

Some of the key messages and policy requirements in this document, which are of relevance to the North Street site, are;

- New housing needs to be developed in suitable locations that offer a range of community facilities and with good access to jobs, key services and infrastructure.
- New housing should contribute towards cutting carbon emissions by focusing it in locations with good public transport accessibility and/or by means other than the private car.
- The priority is that new housing is developed on previously developed land. Opportunities for housing provision on surplus public sector land also need to be considered.
- Planning Authorities need to develop policies and implementation strategies that ensure sufficient and suitable land is available to achieve the housing objectives. This includes identifying deliverable sites to deliver housing in the first five years of the plan period and to identify broad locations and sites that will enable continuous delivery of housing for at least 15 years from the date of LDF adoption.
- Sites identified for housing within the first five years of the plan need to be available now, be a suitable site within a suitable location and have a reasonable prospect that housing will be delivered on the site within five years (i.e. viability issues do not prevent it from being delivered). Sites and broad locations identified beyond the first five year period will also need to meet these criteria, with the exception that they will only need to have a reasonable prospect of being available for development.

#### Planning Policy Statement (PPS) 4: Planning for Sustainable Economic Growth

Some of the key messages in this document that are relevant to this topic paper are:

- The overarching national objective is sustainable economic growth in order to generate wealth, improve economic performance, promote regeneration and tackle deprivation. Local authorities should have a clear and flexible vision and strategy for their area to meet these objectives.
- Economic growth should promote more sustainable patterns of development, reduce the need for travel, and respond to climate change.
- Local planning authorities need to assess the existing, and future, supply of land available for economic development, ensuring that existing site allocations are considered against national policy and, where possible, be combined with Strategic Housing Land Availability Assessments.
- A range of sites should be identified to meet a broad range of economic development needs, including mixed use sites, with priority for brownfield sites and for sites which meet the needs of existing and growing sectors of the local economy.



- The vitality and viability of town centres should be promoted. Local authorities should consider the need for additional retail and leisure floorspace and, in meeting any future needs, apply a sequential approach giving preference to sites in, then on the edge of, town centres, before any “out of centre” development.

### **Planning Policy Statement (PPS) 12: Local Spatial Planning**

Some of the key messages in this document that are relevant to this topic paper are:

- A Core Strategy can allocate strategically important sites. This could include large-scale housing sites, or sites for mixed-use development.
- Evidence will need to be provided that will demonstrate how and when the physical, local and green infrastructure, which will need to accompany development of a strategic site, will be provided.

### **Planning Policy Statement (PPS) 25: Development and Flood Risk**

Some of the key messages in this document that are relevant to this topic paper are:

- The overall aim of national policy is to ensure that flood risk is taken into account at all stages of the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk (The “sequential test”).
- Where new development is, exceptionally, necessary in areas at flood risk, national policy aims to make it safe without increasing flood risk elsewhere and, where possible, reducing flood risk elsewhere (The “exceptions test”).
- Local planning authorities should prepare and implement planning strategies that help to deliver sustainable development by appraising, managing and reducing risk in a partnership involving the Environment Agency, other operating authorities and other stakeholders.
- A Strategic Flood Risk Assessment (SFRA) should be prepared by the local authority to provide a framework for the appraisal, management and reduction of flood risk in both LDFs and individual development proposals.
- Where development is considered in an area at risk of flooding, it needs to be considered against the SFRA, site specific Flood Risk Assessments and opportunities for mitigating residual flood risk (e.g. development behind existing flood defences, upgrading of flood defences with developer contributions, flood resistance and resilience, and flood warning and evacuation plans).

## **Regional Planning Policy**

### **South East Plan – Policy H1**

This requires Lewes District Council to prepare a plan to enable delivery of an annual average of 220 net additional dwellings. This equates to a total of 4400 net additional dwellings over the SE Plan period to 2026.

### **South East Plan – Policy SP3**

Requires a focus on development in urban areas, in order to foster accessibility for employment, housing, retail and other services, and to avoid unnecessary travel.



**South East Plan – Policy CC8**

Local authorities, and others, should work together to provide and manage connected and substantial networks of multi-functional green space. This will conserve and enhance biodiversity, landscape, recreation, water management and flood risk management.

**South East Plan – Policy RE3**

Requires local authorities to have regard to the changing local economy and to facilitate a flexible supply of land to meet the needs of different business sectors.

**South East Plan – Policy NRM4**

Requires application of the sequential approach to development in flood risk areas, as set out in PPS25, avoiding development in flood risk areas, unless there is an overriding need and an absence of suitable alternatives.

**South East Plan – Sussex Coast sub-region (Policies SCT1 – SCT7)**

The priority in policy SCT1 is sustainable economic growth and regeneration of the Sussex Coast.

Policy SCT5 requires that a significant proportion of the Council's housing requirement is met in the part of the District covered by the Sussex Coast sub-region (this sub-region includes all the main towns within the District including Lewes). Across this sub-region an annual average of 170 net additional dwellings (3,400 across the plan period) will need to be provided. Some flexibility will be allowed in relation to these requirements.

Most of the residential development in the sub-region should be focused on existing towns by optimising the use of previously developed land and, where necessary, by making new land allocations as sustainable urban extensions.

**The Council's own documents and evidence base**

The Council has already produced a number of documents and prepared a number of pieces of evidence that will inform the emerging policy on housing distribution. Further evidence is also currently being, or will be, prepared to inform the emerging LDF Core Strategy. The majority of this evidence will be in place to inform the Preferred Strategy stage of the document.

**Lewes District Sustainable Community Strategy (2008)**

One of the priority themes of the Sustainable Community Strategy is "Decent and Affordable Housing for All". Two shared aims underpin this priority theme, which are "decent, affordable and sustainable housing for all, regardless of tenure" and; "meeting the housing needs of everyone in the District".

**Annual Monitoring Report (2008/09)**

There have been 969 net dwelling completions between the 1 April 2006 and the 31 March 2009. The residual requirement for the District is, therefore, 3,431 dwellings, which equates to 202 net additional dwellings per annum.

The Annual Monitoring Report identifies that the Council's current five year housing requirement is expected to be met and can be identified at this stage.



### **Strategic Housing Land Availability Assessment (SHLAA) (to be completed in 2010)**

The 'call for sites' and initial screening has resulted in a significant number of sites that will be assessed through the SHLAA, some being strategic in nature (the North Street site is one of these).

### **Strategic Housing Market Assessment (SHMA) (2008)**

The SHMA considers that there are significant constraints, such as the National Park designation and significant areas at risk from flooding in urban areas, which could impact upon the timely delivery of housing.

The SHMA has also concluded that the District Council may need to develop proposals for reasonably significant land releases in the north of the District and outside the proposed National Park to secure the long term delivery of housing.

### **Employment Land Review (ELR) (to be completed in 2010)**

The ELR examines the current stock of employment land across Lewes District and its continued suitability to meet the needs of businesses (the North Street employment land will be assessed as part of this study).

It will also consider whether additional land needs to be allocated to meet the needs of the local economy.

### **Strategic Flood Risk Assessment (SFRA) (2009)**

Part one of this document provides detailed mapping of flood risk in Lewes District from all forms of flooding.

Part two provides a more detailed assessment of flood risk in Lewes and Newhaven, taking account of flow paths, velocities and depths, and the performance of existing flood defences.

The SFRA provides a "toolkit" for the assessment of flood risk in both the Local Development Framework and individual development proposals.



**This leaflet can be made available in large print, audiotape, disk or in another language upon request.**

**Please telephone 01273 484141 or  
email [lewesdc@lewes.gov.uk](mailto:lewesdc@lewes.gov.uk)**

