

Lewes District: Retail & Leisure Study

Prepared for: Lewes District Council

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CUSHMAN &
WAKEFIELD



c p w planning

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1. INTRODUCTION

Purpose of the Study

Cushman & Wakefield, alongside CPW Planning, has been instructed by Lewes District Council (LDC) to prepare a new Retail and Leisure Study for the District. It supersedes the Lewes District Shopping and Town Centres Study 2012.

The Study has been prepared in parallel with the [Eastbourne Borough Retail and Leisure Study 2022] as part of a joint commission from Lewes and Eastbourne Councils.

It has been prepared in the context of the Covid-19 pandemic and utilises the latest available information, including a new household telephone survey of shopping patterns.

The main objectives of the Study can be summarised as follows:

- i. Review the national and local planning policy context relevant to the Study;
- ii. Review the retail, leisure and office markets and the trends influencing change and town centre investment;
- iii. Undertake town centre healthcheck assessments;
- iv. Forecast the expenditure-based capacity for new retail floorspace in the District based on two scenario assessments – including and excluding Lewes Town within the South Downs National Park (SDNP);
- v. Prepare a commercial leisure ‘needs’ assessment for Lewes District / Lewes Town;
- vi. Review town centre boundaries and primary shopping areas; and
- vii. Provide planning policy advice relating to town centre matters.

This Study therefore provides the evidence base to assist LDC with its work on the emerging Local Plan, and to support the development management function of the local planning authority. It has been prepared in accordance with the National Planning Policy Framework (NPPF) (July 2021) and the *Town centres and retail* section of the Planning Practice Guidance (PPG) (as updated on 18 September 2020).

Structure of the Study

This Study is structured as follows:

- Section 2 – Planning Policy Context
- Section 3 – Market Context & Trends
- Section 4 – Town Centre Health Checks
- Section 5 – Retail Needs: Approach & Baseline Evidence
- Section 6 – Retail Needs: Forecasts
- Section 7 – Commercial Leisure Needs Assessment
- Section 8 – Town Centre Boundaries & Primary Shopping Areas
- Section 9 – Summary & Policy Recommendations
- Appendix i – Catchment Area Plan
- Appendix ii – Retail Capacity Tables
- Appendix iii – Household Survey Results
- Appendix iv – Town Centre Boundaries & Primary Shopping Areas
- Appendix v – Further Details on the Retail Capacity Model

2. PLANNING POLICY CONTEXT

This section provides an overview of the relevant national and local planning policy context pertaining to retail and other main town centre uses.

National Planning Policy Framework (NPPF)

Local Planning Authorities (LPAs) should take the NPPF into account in the preparation of Local Plans. The presumption in favour of sustainable development is a key objective for both plan-making and decision-taking, and the NPPF (paragraph 11) sets out the Government's view of what constitutes sustainable development.

For plan-making the NPPF states that plans should promote a sustainable pattern of development by seeking to meet the development needs of their area, align growth and infrastructure, and improve the environment. For decision-taking the onus is on LPAs to approve development proposals that accord with an up-to-date development plan without delay. Where the development plan is silent, or policies are out-of-date, permission should be granted unless there is a clear reason for refusal.

Chapter 3 ***Plan-making*** provides guidance to LPAs on preparing their development plans. Paragraph 20 requires plans to include strategic policies that make sufficient provision for (inter alia) housing, employment, retail, leisure and other commercial development, alongside infrastructure and community facilities.

Paragraph 31 states that planning policies should be underpinned by relevant and up-to-date evidence. To ensure plans and spatial development strategies are relevant they should be reviewed at least once every five years and updated as necessary (paragraph 33).

Chapter 6 ***Building a strong, competitive economy*** requires planning policies to create the conditions in which businesses can invest, expand and adapt. It states that planning policies should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future, including by setting out a clear economic strategy and being flexible enough to accommodate needs not anticipated in the development plan.

Chapter 7 ***Ensuring the vitality of town centres*** provides guidance on plan-making and decision-taking for retail and other main town centre uses. Paragraph 86 sets out criteria that LPAs should consider when preparing planning policies. These include:

- Defining a network and hierarchy of town centres;
- Defining town centre boundaries and Primary Shopping Areas;
- Retaining and enhancing existing markets and the potential to create new markets;
- Meeting anticipated needs for main town centre uses over (at least) a 10-year period by way of identifying suitable town centre sites;
- Where suitable town centre sites are not available, identifying suitable edge-of-centre or other locations subject to their connectivity and accessibility to the town centre;
- Promoting residential development in town centres.

Paragraphs 87-91 specifically set out the sequential and impact tests relevant to determining applications for new retail and other main town centres uses that are neither in an existing centre, nor in accordance with an up-to-date development plan.

Paragraph 87 states that, *Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.*

Paragraph 88 adds, *When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility*

on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

Paragraph 90 refers to the impact test. It applies to all applications for retail and leisure development (only) over a proportionate, locally set floorspace threshold (the default threshold is 2,500 sqm gross if there is no locally set threshold). This should include assessment of the impact on:

- a) *existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- b) *town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).*

The NPPF (paragraph 91) states that, *Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 90, it should be refused.*

Planning Practice Guidance (PPG)

This Study also draws on advice set out in the ***Town centres and retail*** section of the PPG, which was updated in September 2020.

Of relevance is paragraph 004, which states that town centre strategies and the assessment of the potential for centres to accommodate a suitable range of development should focus on a limited period (such as the next five years) given the uncertainties around forecasting long-term retail trends and consumer behaviour.

The PPG provides advice to LPAs on the preparation of development plans and town centre strategies. In terms of what a town centre strategy should contain, paragraph 004 refers to:

- the realistic role, function and hierarchy of town centres over the plan period;
- the vision for the future of each town centre, including the most appropriate mix of uses;
- the ability of the town centre to accommodate the scale of assessed need for main town centre uses, and associated need for expansion, consolidation, restructuring or to enable new development or the redevelopment of under-utilised space;
- how existing land can be used more effectively;
- opportunities for improvements to the accessibility and wider quality of town centre locations;
- what complementary strategies are necessary or appropriate to enhance the town centre;
- the role that different stakeholders can play in delivering the vision:
- appropriate policies to address environmental issues facing town centres.

In circumstances where future development needs cannot be accommodated in town centre locations, the PPG (paragraph 005) states that *planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the identified need for these main town centre uses, having regard to the sequential and impact tests.*

In applying the sequential test for plan-making purposes, LPAs are expected to consider the following checklist (paragraph 010):

- Has the need for main town centre uses been assessed?
- Can the identified need for main town centre uses be accommodated on town centre sites?
- If the additional main town centre uses required cannot be accommodated on town centre sites, what are the next sequentially preferable sites that they can be accommodated on?

Paragraph 006 of the PPG identifies a series of indicators that may be relevant in assessing the health of town centres, including but not limited to the diversity of uses, vacancy rates, retailer representation, pedestrian flows, and evidence of barriers to business investment. These indicators underpin our town centre healthcheck assessments.

Guidance is also provided on permitted development and change of use in town centres (paragraphs 007-008), including where it may be appropriate to use permitted development rights to support flexibility in town centres.

Development Plan

Lewes District Local Plan: Joint Core Strategy (2016)

The Joint Core Strategy 2010-2030 was adopted in May 2016 sets out the long-term spatial vision for the District.

Core Policy 6 (Retail and town centres) aims to enhance the vitality and viability of the District's town centres. It includes four main parts.

Part 1 describes the role of each centre in the three-tier retail hierarchy comprising Main Town Centres, District Centres and Local Centres. The policy supports development that reinforces or enhances the identified role of the centre in the retail hierarchy:

Main Town Centres:

The district's primary focus for retail activity, particularly within the defined Primary Shopping Areas and Primary Shopping Frontages where a predominance of retail units will be retained. The loss of retail units that are within these defined areas and frontages will be resisted. Other appropriate uses within Main Town Centres will include appropriate leisure facilities; restaurants; offices; arts, culture and tourism facilities. A diversity of such uses will be particularly encouraged in the Secondary Shopping Frontages and more peripheral areas of the town centres where they support the wider function, vitality and viability of the town.

District Centres:

A predominance of retail units will be retained within the defined Primary Shopping Areas and Primary Shopping Frontages in order to maintain a range of convenience and comparison retail goods to serve the local area. The loss of retail units that are within these defined areas and frontages will be resisted. A range of other supporting uses and services such as cafes, financial and professional services and offices will be encouraged in the more peripheral areas of the town centres where they support the wider function, vitality and viability of the town centre.

In Newhaven town centre a diverse range of retail and other uses such as cafes, restaurants, financial and professional services, employment, arts, cultural and community facilities will be encouraged in order to support the retail function. Such uses will also be permitted in vacant retail units within the Newhaven Primary Shopping Area. Changes of use to residential will be supported in Newhaven town centre, except at street level in the Primary Shopping Area, where other appropriate alternative uses such as retail, cafés, restaurants, financial and professional services, arts, cultural or community facilities cannot be identified.

Local Centres:

In order to ensure local shopping centres remain a vibrant focus for the local community a range of retail, employment, leisure, cultural and community uses will be encouraged. Local shops and community facilities (such as meeting places, sports facilities, public houses, places of worship and cultural assets) will be retained unless it can be demonstrated that they are financially or otherwise unviable.

Part 2 sets out the sequential test for edge-of-centre and out-of-centre retail development proposals and requires Retail Impact Assessments where the following thresholds are exceeded:

- Main Town Centre – 750 sqm
- District Centre – 500 sqm
- Local Centre – 250 sqm

Part 3 requires that development proposals in edge-of-centre or out-of-centre locations provide, enhance, or make contributions to, improved pedestrian and cycle linkages to the town centre.

Part 4 seeks to support and retain local shops in locations not identified in the retail hierarchy unless:

1. a viability appraisal, including a marketing exercise, demonstrates that continued use as a shop is no longer feasible; or

2. an alternative facility of equivalent or better quality will be provided in an accessible location within the same locality.

It adds that, where such uses are demonstrated to be unviable, alternative community uses will be sought in the first instance. Proposals for new small-scale rural retail and community facilities will be encouraged where they provide for local needs.

3. MARKET CONTEXT & TRENDS

Retail Market

UK Market Context: Strategic Trends

The retail sector endured an especially difficult pandemic, with multiple lockdowns requiring businesses to close or reduce their operating capacity significantly. Online businesses were better placed to react to those lockdowns and the resultant wider change in customer behaviours, and these pressures resulted in the permanent closure of many shops and businesses. This large-scale disruption caused the number of lettings to drop significantly, and when coupled with business closures this resulted in an increase in retail vacancies, with shopping centres and less affluent towns being most severely impacted by these disturbances.

The highest number of net business closures were concentrated in city centres, whilst smaller centres were more resilient. Shopping centres were hit disproportionately hard due to their higher proportion of tenants within fashion and leisure – two of the sectors that were most harmed by the pandemic. Retail parks generally prospered during the pandemic, and have remained the most resilient type of retail location since the relaxation of restrictions.

The lifting of restrictions saw footfall and sales growth, resulting in a commensurate growth in levels of leasing, and in the first six months of this year, store closures have slowed significantly – from 61 a day in the first half of 2020 to 34 per day in the first half of 2022 – the lowest level since 2017¹. Lettings UK-wide reached a four-year high in the final quarter of 2021, with a notable revival in leasing activity by fashion and food and beverage retailers spurring this.

The discount retail sector has seen recent expansion, mainly in out of town locations. A host of big deals by the likes of B&M, The Range and Poundstretcher have occurred in recent months. B&M has been especially active, taking c. 20,000 sq ft stores in Crewe, Eastbourne, Leeds and South Shields. Alongside B&M, the likes of Lidl, Aldi and Decathlon have all been expanding into new sites in the last year.

However, these green shoots are now once again threatened by the Bank of England's predictions of an impending recession – issues such as rising inflation and a burgeoning cost of living crisis have dented consumer confidence and as a result, retail is once again facing difficult market conditions.

This market context has of course had property-side impacts. There is little retail space in the construction pipeline in response to the aforementioned high vacancies and struggling tenants, and in fact in many larger towns there has been a recent trend for removing retail space, for example by converting department stores into a variety of other uses, something exacerbated by changes to planning regulations.

As with lettings, investment in the sector – with the exception of supermarkets, which have generally remained strong – has dropped sharply, and prices paid have followed, although the aforementioned repositioning of shopping centres/department stores has led to some speculative investment in the sector with an eye to changing uses away from retail.

Most recent and ongoing retail construction is in the form of town centre regeneration, with local authorities proactively working with retail landlords to revitalise high streets in places like Maidenhead, Slough, Stockport and Basildon. Local authorities have been buying shopping centres to proactively regenerate their town centres; however this trend has ebbed a little over the past year or so as other investors move into the space. A host of shopping centres have been acquired recently, which saw investment in the sector rise in 2021.

Of particular importance to the Lewes town centres' retail provision are changes to the Use Classes Order, including the 'new' Class E; and the permitted development right (PDR) effective since August 2021 allowing the conversion of Class E uses to residential. Class E encompasses many – but not all – main town centre uses as well as some non-main town centre uses (e.g. clinics, health centres, creches). The new PDR introduced in 2021 allows for the change of use from Class E uses to residential (extending a right that had previously been restricted to offices). It is subject to maximum size

¹ PWC <https://www.pwc.co.uk/industries/retail-consumer/insights/store-openings-and-closures.html>

requirements (up to 1,500 square metres), the property having been in use as Class E for two years, and the property having been vacant for three months. In addition to this, 'Prior Approval' for the change of use must be sought from the local planning authority. Restrictions on this right apply for listed buildings as well as in areas that are covered by Article 4 directions.

We have set out some trends in retail below:

The growth of online shopping

- The rapid growth in online shopping since the late 1990s has increased the market share of non-store retail sales with visible consequences for high streets and other shopping destinations. Yet the degree of impact is uncertain in the context of multi-channel retailing: stores are often a source of stock for online retail sales, while the internet can even direct customers to stores (e.g. use internet to research but make purchase in store).
- In 2019, before the Covid-19 outbreak, online shopping accounted for around 20% of total retail sales with significant variations by sector. Only around 5% of food sales were internet-based, whereas almost 20% of clothing and footwear sales (a key sector for many larger town centres) were attributable to online shopping. Some 60% of sales on DVDs, music and books were made online.
- The pandemic and the national lockdowns that followed, resulting in the temporary closure of many shops, accelerated the significant growth in online shopping. According to UK figures published by ONS, online retail sales as a proportion of total retail sales peaked at above 30% in January 2021, before falling in the following months as restrictions were gradually lifted over the spring and summer. Notwithstanding the drop in non-store shares during 2022, it is expected that these shares will remain higher than 2019 levels.

Improved digital capability

- Consumers are demanding, often unwilling to wait more than 2-3 days for deliveries, whilst being increasingly dependent on technology to fulfil one's shopping needs. The pandemic has changed or reinforced pre-lockdown behaviours, with more consumers willing to try – and switch to – digital forms of shopping.
- Modern retailers are therefore investing more and more in digital platforms. This is coinciding with the decisions of some retailers to close their bricks-and-mortar stores and transforming into online-only brands. Examples include Maplin, Cath Kidston, and TM Lewin; and the trend is not limited to retail, with Thomas Cook (travel agent) and others also relaunching as online-only businesses.
- While many larger retailers are investing in digital channels, this is not necessarily the case with smaller independents and high street businesses (although Covid-19 related impacts have forced some businesses to establish or develop online interest in order to generate sales). For most retailers, however, successfully combining physical and digital propositions will be necessary in the face of an increasingly competitive marketplace.

Right-sizing store portfolios

- Prior to Covid-19, the shift towards online shopping resulted in a period of significant change and quite considerable consolidation from long-standing UK retailers. Large retailers increasingly focused on a smaller number of prime locations for their store portfolios (often referred to as polarisation) where they can have flagship-type stores and serve wide catchments. Others relaunched as online-only retailers, as commented before.
- Much of this change can be attributed to a large number of loss-making stores, particularly in the context of reducing footfall and a highly competitive pricing environment. Company voluntary arrangements (CVAs) have been a preferred restructuring method for many retailers such as Debenhams, Monsoon, Mothercare, Homebase, New Look and Accessorize.
- Some retailers are continuing to 'right-size' or even abandon their store portfolios. Others however – notably the discounters such as Aldi, Lidl and B&M – continue to expand throughout the UK and mainly in out-of-centre locations.
- The pandemic has also had a major impact on the 'grab-and-go' food market, which relies heavily on office workers and commuters. The shift in work patterns and the reduction in footfall has made some outlets unviable, with Pret and Costa Coffee announcing widespread closures in the past 12-18 months.

- Service-based retail uses (i.e. financial services, travel agents) have seen a gradual contraction in store numbers in recent years, due to the continued growth of internet alternatives which provide convenient access to online banking and holiday price-comparison websites. This form of structural change has consequences for footfall and consumer spending, most notably in secondary town centres which are more dependent on such uses.

Changing store formats

- Today's consumer has high expectations for convenience, experience and personalisation; largely driven by smart phone technology (i.e. Apps) and social media (i.e. Facebook, Instagram, TikTok). Shopping is becoming more leisure focused and activity-based, which is reflected in new, often extensive store formats.
- The large Next / Next Home 'flagship' stores are a well-known example of a major retailer developing out-of-town showrooms to provide a substantially expanded range of comparison goods and lifestyle experiences.
- Some retailers, on the other hand, require (or are experimenting with) smaller and more efficient store formats. Homebase has launched a new split-level, small format showroom dedicated to kitchens (at ground floor level) and bathroom displays (first floor). Dunelm operates a similar town centre format. These concepts coincide with the shift towards home or 'hybrid' working and greater levels of spending on home improvements.
- The grocery sector has been reacting to changing shopping habits in recent years with implications for store formats. The underlying trend prior to Covid-19 was the decline of 'bulk' food shopping as consumers shopped around for best value and/or undertook more frequent top-up (or 'basket') food shopping trips. This trend coincided with Aldi and Lidl expanding their market share, driven by store expansion programmes, and it was confirmed in September 2022 that Aldi has overtaken Morrisons to become the UK's fourth-largest grocery retailer.
- Retailers are increasingly incorporating click-and-collect services into their stores or within adjacent customer car parks (for example Argos within the Sainsbury's outside of Newhaven town centre). As well as often accounting for a substantial proportion of retailers' online sales, click-and-collect reduces 'last mile delivery' costs and can create additional sales volumes.

Space sharing

- The adaptability of retail space is increasingly important in a fast-moving sector. There is greater collaboration between retailers in terms of sharing space; and between shopping centre landlords and their tenants in the provision of collection points and/or lockers.
- One of the most successful retailer tie-ups has been Sainsbury's and Argos, while Laura Ashley recently returned to the UK high street in a new partnership with Next. B&Q has concession stores in a small number of Asda superstores, an example of this within the Lewes District Council area is the Iceland concession with The Range outside of Newhaven town centre.

The sharing of town centre space is not limited to the retail sector, however:

- Foundry in Eastbourne Town Centre (The Beacon) is an excellent example of shared, repurposed shopping centre space. Spread over two floors, it offers a range of co-working and incubation spaces for rent as well as ground floor concession space for independent traders.
- A further example – west along of the South Coast – is Bournemouth's iconic former Debenhams building, which has been reinvented as a community, experience-led mixed use destination for local traders and entrepreneurs. Now known as Bobby's, it includes a market hall, a beauty hall, artist space and a gallery, a traditional ice cream and coffee parlour, and other food and beverage uses with outdoor seating.

Such concepts highlight the potential opportunities for the re-use of the former Debenhams department store in Eastbourne Town Centre (subject to viability and other factors).

- Innovative concepts of this nature are likely to become more common as large, redundant retail (and non-retail) spaces become more difficult to fill with single occupiers; and will help to offset rising occupancy/operational costs. The changes to the Use Classes Order – with the new Class E encompassing retail, commercial, business and service uses – provide greater flexibility and will make it easier to co-locate two or more asset classes within the same premises.

Meanwhile uses

- Markets have always been an important part of many city and town centres, and bring animation and vibrancy which traditional high streets often lack, for example Seaford Town Market, although this market is infrequent – running only on the second and fourth Saturday of each month – and Newhaven Country Market, which we understand has been unable to reopen post-covid.
- New ways of generating activity and engaging with town centre users have emerged in recent years in the form of pop-up shops and other uses including flexible workspaces (e.g. Foundry in Eastbourne Town Centre as mentioned previously). As well as addressing vacant or under-utilised space and tapping into local entrepreneurialism, they help to deliver a bespoke retail experience and often become permanent attractions.

Lewes Local Market

When Lewes is referred to in this section, it is in reference to the district council area rather than the town.

Retail vacancies in Lewes were elevated relative to the five-year average during the fourth Quarter of 2022, at 4.4% vs. an average of 3.5%², and most of this increase has taken place in the last year, with the rate averaging 3.2% in 2021 and generally fluctuating within the 3% range across the previous five years. In fact, the current rate is the highest it has been in the CoStar dataset, which has been collected since 2010. This rate is above CoStar’s overall UK market average of 3.1%, and the town centre retail market remains characterised by weak occupier demand and ongoing rent renegotiations as occupiers seek to reduce their occupational costs.

There has been a recent lull in the level of retail development in Lewes, with nothing delivered in the past three years. However, having been granted over £5 million in government Future High Streets funding in 2021 for the project, Lewes Council have recently commenced delivery of a new mixed use scheme on the former Co-op site and adjacent multi-storey car park within Newhaven Town Centre. This will in effect only be partially replacing lost retail, but with the intention of reinvigorating the town centre and thus decreasing the vacancy rate.

Retail investors are reasonably active in Lewes, but in the past year, deal flow cooled in the submarket. At £192/sqft, market pricing is considerably lower than East Sussex’s average pricing of £188/sqft³.

Regional Comparator Analysis

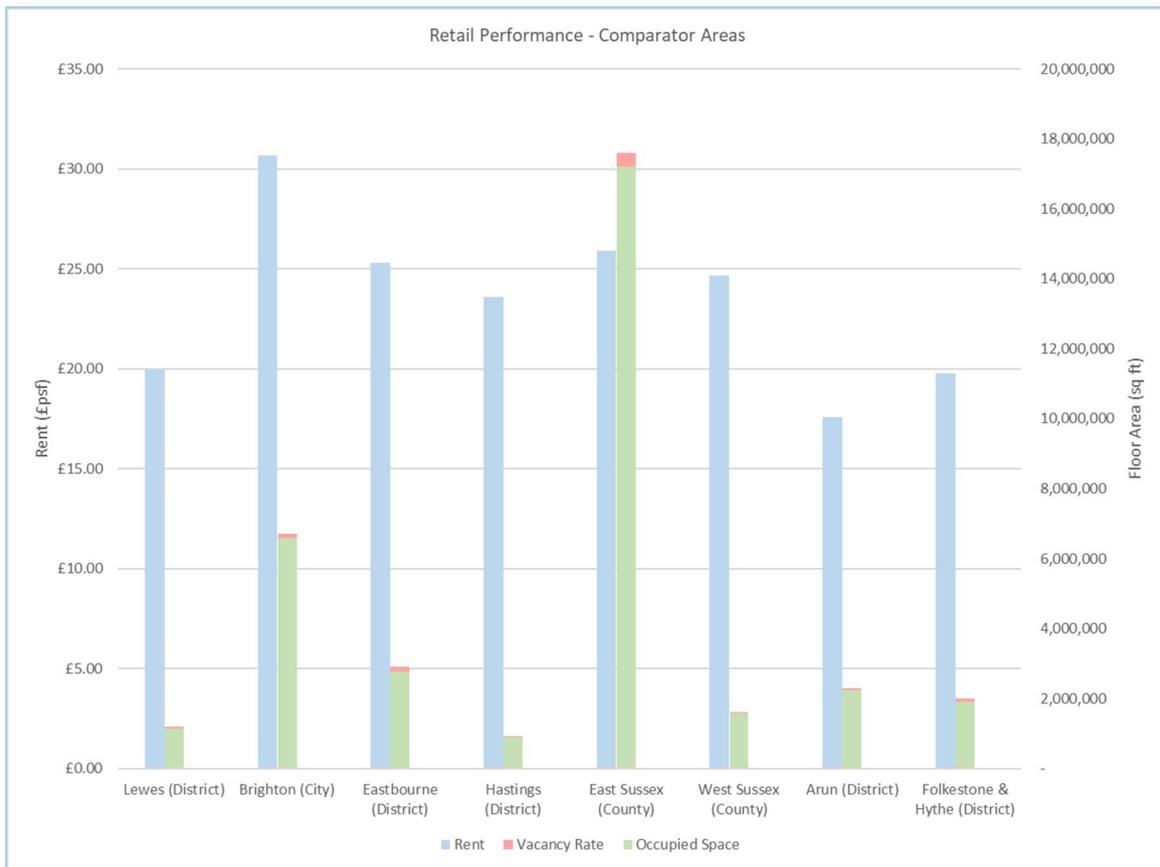
We have sought to assess how Lewes District performs in comparison with a variety of similar nearby areas in order to provide additional context to our analysis. This section will seek to provide that contextual basis through data, whilst identifying any notable points that we consider to be of value. It is important to note that all data within this subsection is sourced from Costar.

Firstly, we have sought to understand the strength of the Lewes District Council area retail market in comparison with those similar Council areas, for which we have used the average rent on a £/sqft basis, the total amount of floorspace within each centre, and the vacancy rate for each centre, all of which is included within figure 01.

² Costar Data

³ Costar Data

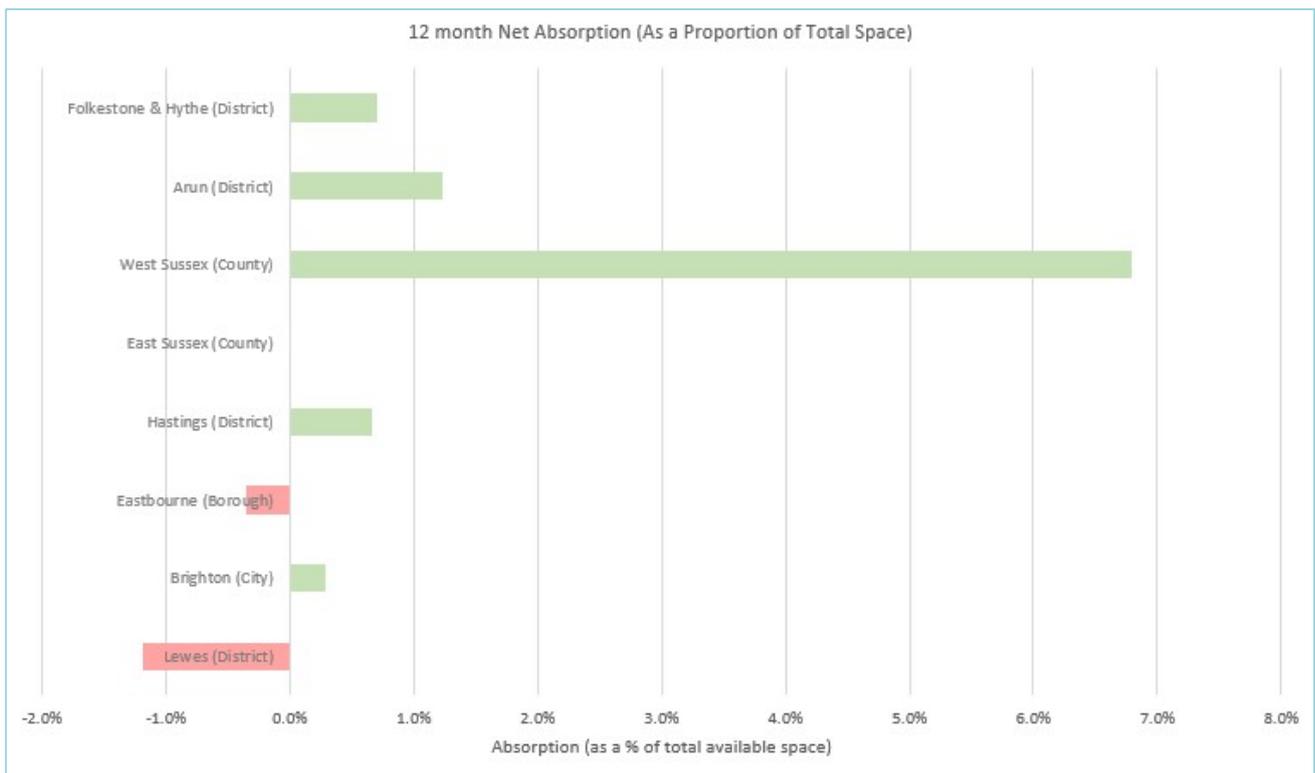
Figure 01 – Retail Performance: Comparator Areas



Of particular note in this graph is that Lewes’ average rent is the third-lowest of all the comparator areas at £19.96/sqft. The two comparator areas achieving lower rents are Arun and Folkestone & Hythe district council areas. Lewes has lower rents than both Eastbourne and Hastings District Councils, the two nearest District Council areas within the comparator areas; these councils have rents that are £5.33/sqft and £3.63/sqft higher than Lewes respectively. Lewes District Council area also has the second-lowest provision of retail space of all the comparator areas.

Figure 02 highlights the amount of space vacated vs. the amount let in the past 12 months, as a proportion of the total space within the comparator area to provide context. As this demonstrates, Lewes District Council area has seen the second-highest proportion of its retail stock vacated without being replaced by new lettings of all the town centres in the last 12 months, and is one of only two that has seen negative absorption in this timeframe.

Figure 02 – Twelve Month net Absorption, as a proportion of total retail space for Comparator Areas



Whilst the space vacated amounts to only 14,200 sqft (1.2% of total retail stock), it is a concern that in the period where there is a demonstrable uptick in lettings throughout the vast majority of the comparable centres post-covid, Lewes does not seem to have been able to attract tenants, particularly when this information is coupled with the (comparatively) high vacancy rate and low rents.

Retail Market Conclusion

It is difficult to generalise when referring to Lewes as the district council area – and therefore this report – contains a variety of towns of different sizes and in different locations within the area, each with their own challenges and opportunities.

However it is important to understand the UK-wide context for retail and consider this when seeking to intervene or improve individual centres. The retail market has been challenging for a long time, and this is a situation that was only exacerbated by the Pandemic, and this sector is likely to be exposed as much as any other to the burgeoning cost of living crisis that is anticipated to affect the UK this winter.

Any focus on improving or increasing the provision of retail, leisure and other town centre uses within these centres will need to take a holistic view as to how footfall can be increased, regardless of the size of the individual centre, as this is key to creating a healthy, vibrant retail location.

However, any proposed interventions will have to be mindful of the centre in question’s size, existing provision and its current/ projected catchment area, in addition to the current retail market context, when making decisions around how to increase the vibrancy of the towns within this study. This is particularly important in the case of Lewes because of the variance in the size of the centres in the District Council area.

Whether these interventions entail: improving the public realm around centre; increasing the amount of leisure/ diversity of uses to help turn the centre into a ‘destination’; ensuring an appropriate mix of retail uses that adequately serves the local population (plus any future projected inhabitants when accounting for residential development); or simply improving accessibility to the centre, a carefully laid out plan that understands how footfall can be increased will be fundamental to ensuring these centres remain healthy.

Leisure & Hospitality Market

UK Market Context: Strategic Trends

This year, 23% of PWC's⁴ retail categories are net positive for new openings; however this proportion of positives are not enough to offset the declines within other categories. Of particular note, of these positive categories, leisure accounts for three of the top four fastest growing, as follows:

1. **Takeaways:** These businesses have grown significantly over the last four years due to increasing demand for home delivery initiated in part by the wider acceptance of delivery apps such as Deliveroo, as well as these businesses' ability to operate throughout the pandemic.
2. **Restaurants:** In the last three years, restaurants have been significantly impacted by the difficult operating conditions resulting from the pandemic, leading to numerous CVAs and administrations, which have resulted in mass closures. As the economy has opened up post-pandemic, new businesses have responded to the increased demand, taking advantage of the lower rents available as a result of the number of vacancies caused by the pandemic.
3. **Amusement Arcades:** As with restaurants, amusement arcades have taken advantage of spaces with low rents caused by the pandemic to increase their presence on high streets.

Without services like banks driving regular footfall, and with some parts of retail having permanently shifted online, leisure will likely become one of the most important footfall drivers to some high streets in the future.

As with the aforementioned parts of the leisure market, the UK's hotel market has continued to recover through the first half of 2022. The leisure sector continues to be the sector's main supporter, with weekend trade recovering at a quicker pace thanks to robust domestic demand. In addition to leisure, events-led trade and the return of some business travel has driven much of the resurgence in larger cities, which are likely to continue throughout the remainder of the year. As all pandemic restrictions have been dropped, including those on international travel, those destinations most reliant on international tourism such as London have also seen growth in hotel occupation.

Hotel construction has continued in the past 12 months in response to these positive market conditions, with approximately 12,000 rooms built, and another 95 hotels added to the market. As with the other sectors highlighted in this report however, rising interest rates, increasing costs due to inflation, labour shortages, and supply chain issues are all putting pressure on the sector, meaning both construction and investment transaction activity could be negatively impacted in the coming months.

Lewes Local Market

The Leisure market in Lewes is intrinsically linked to the retail market as, with the exception of specific assets such as theatres, museums and cinemas, these two uses generally utilise the same retail-type spaces within town centres and so rents and yields are commonly relatively aligned.

We have used GOAD data to extrapolate cultural/ leisure statistics for Lewes. However it is important to note that this data is incomplete inasmuch as it only covers the following centres: Peacehaven Shopping Streets, Peacehaven Meridian Centre and Seaford – we have then sought to supplement this data with on the ground research which will form the remainder of the town centre information (Ringmer, Newick and Newhaven) for Lewes. For Newhaven in particular, we have disregarded the Co-op site from this study as it is currently being redeveloped and so providing an accurate count of units/ vacancies etc. was not possible.

Across these centres, c. 21% of the retail provision on a unit-by-unit basis is dedicated to leisure uses. The most significant proportion of this provision is dedicated to food and drink, with restaurants, cafes and fast food/ takeaways comprising

⁴ <https://www.pwc.co.uk/industries/retail-consumer/insights/store-openings-and-closures.html>

66% of the leisure uses on a per unit basis. Beyond these uses, the next most significant proportion is pubs and bars, which are c. 18% of the total units.

There is a significant amount of leisure/ cultural provision within Lewes, however much of this is located outside of the centres being assessed within this report, mostly within Lewes Town itself. In the centres assessed in this report, the Crypt in Seaford is a small art gallery, Seaford Museum is also located in the town, and Newhaven Fort in Newhaven is a historic attraction that attracts more than 30,000 visitors a year⁵.

There is very little information regarding hotel performance within the Lewes area due to the small number of hotels in the town centres studied. There is one hotel apiece in Seaford, Newhaven, Peacehaven and Newick, and each of these is either in a pub or is a small private B&B type offering. There is no hotel provision in Ringmer. There are no hotels in the pipeline in Lewes, and no hotels have been delivered since 2016.

Comparator Town Analysis

We have sought to assess how Lewes District Council performs in comparison with a variety of similar nearby comparable areas in order to provide additional context to our analysis. This section will seek to provide that contextual basis through data, whilst identifying any notable points that we consider to be of value. It is important to note that all data within this subsection is sourced from Costar.

Figure 03 – Total TC Hotel Provision (Rooms & Average Occupancy (Past 12 months))

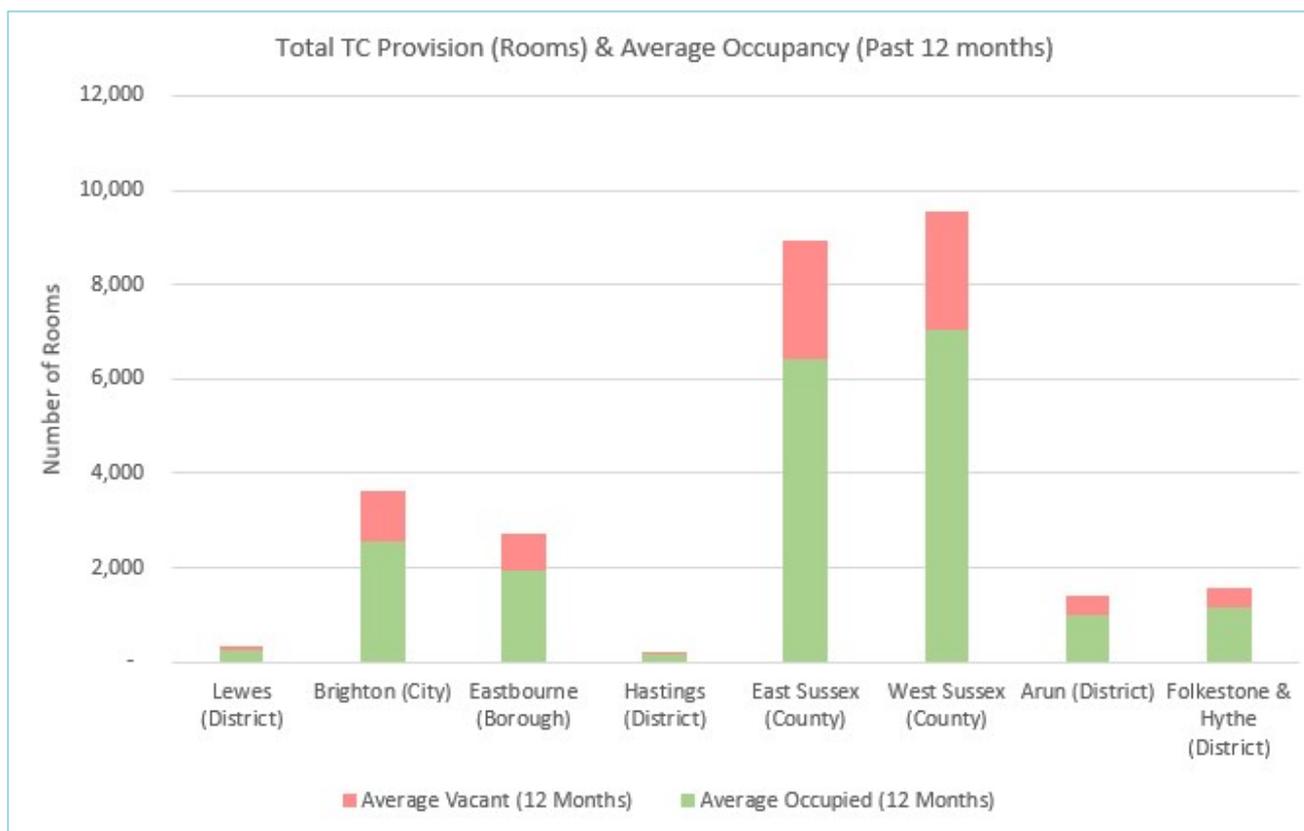


Figure 03 shows the total number of rooms available in each of the comparator areas, and the average number of these rooms that have been vacant over the past 12 months. At 78.7%, Lewes has the second highest occupancy rate of all the comparator areas (Hastings is highest at 82%) these high occupancy rates are tempered by the fact that these two District Council areas have the lowest total provision.

⁵ <https://www.newhavenfort.org.uk/significant-cash-boost-newhaven-fort/#:~:text=Attracting%20more%20than%2030%2C000%20visitors,been%20closed%20since%20March%202020.>

Leisure & Hospitality Market Conclusion

As highlighted in the Lewes Local Market subsection, the leisure offer in the town is relatively healthy in terms of availability, having a number of successful art galleries, theatres and other cultural institutions, plus restaurants, pubs and cafes.

Whilst several of these town centres are relatively vibrant and well used, there is a very local focus to their cultural offerings/ attractions. As a result, there is very little in the way of hotel provision within any of these towns. Given this local focus, as well as their proximity to more well-known tourist destinations such as Brighton, Eastbourne and Hastings, we do not consider it likely that the level of hotel provision is likely to increase in the near to mid-term, and as such the health of these towns will remain intrinsically linked to the local population, likely via an increase in the overall population via housing development.

Office Market

UK Market Context: Strategic Trends

Whilst prime office locations within cities such as London, Bristol and Cambridge have seen office take up rebound strongly since the loosening of pandemic restrictions, demand in the UK outside of these markets has remained subdued. Businesses vacating space coupled with weak demand has led to vacancy rates increasing UK-wide, with national rates currently at a six-year high of 6.9%. The presence of approximately 31.1 million sqft of additional office space in the pipeline – the majority being delivered in the next 18 months – means at a minimum this rate is unlikely to improve in the near future, and will likely grow.

Office rents fell sharply during the pandemic, although as with vacancy rates these have stabilised in prime city centre locations, in particular as a result of an increase in demand for high-quality, well-ventilated space that performs well from an ESG (Environmental, Social and Governance) perspective. Much of this has been driven by the technology media and telecom, life sciences and professional services sectors, all of which remained relatively resilient through the pandemic.

Investment rose to a three-year high in the first quarter of 2022, although as with rents and vacancy rates, this rebound is predominantly led by the UK's largest cities, with smaller regional cities and towns lagging some way behind.

Lewes Local Market

It is important to note that, whilst this section seeks to cover all the town centres within the wider town centre study and so this section is not limited to the town of Lewes specifically, almost all the office provision within the Lewes Council area is located either within or on the outskirts of Lewes Town, and there is virtually no office provision in Peacehaven, Newhaven or Seaford.

Lewes District Council Area is a small submarket that contains around 700,000 sq ft of office space. The vacancy rate has risen significantly over the past 12 months, and at c.6.5%, was well above the long term average as of Q4 2022.

Annual net absorption – the amount of space let compared with the amount vacated by tenants – was negative across the past 12 months, with 8,400 sq ft more space vacated than let in that time period. However, this story improves over a longer timeframe, as across the past five years the submarket has posted average net absorption rates of c. 1,700 sq ft per annum. According to Costar, rents have fallen by 1.1% in the past 12 months, but the longer-term perspective is significantly more positive with rents increasing at an average of 4.1% annually over the past decade.

The largest office lettings in the Lewes District Council area are:

- Secretary of State for Housing Community and Local Government: 23,000 sq ft of space in Medwyn House, Lewes
- Howdens Kitchens: 18,000 sq ft of space in 4-8 Bell Lane, Uckfield
- Pittway Systems Technology Group: 15,000 sq ft in Caburn House, Lewes

Beyond these tenants, the majority of lettings are small (under 10,000 sq ft). The vast majority of these office occupiers are in Lewes and to a smaller extent Uckfield.

According to commercial monitoring data provided by Lewes District Council, which collates planning applications that extend back to 2012, there have been 55 planning applications for conversions from commercial to residential, of which three would result in losses in office floorspace. If all three planning applications were enacted, this would result in a loss of 13,500 sq ft of office space.

There are no pressures on the vacancy rate in the near term, as there is very little office space under construction or in the planning pipeline in Lewes. This empty development pipeline will limit the growth in office provision in the years to come, which unusual for Lewes as it has experienced an expansion of 7.2% in its inventory over the past three years; the most recently completed office building was Atelier Works on the outskirts of Lewes Town Centre, which was finished in 2021.

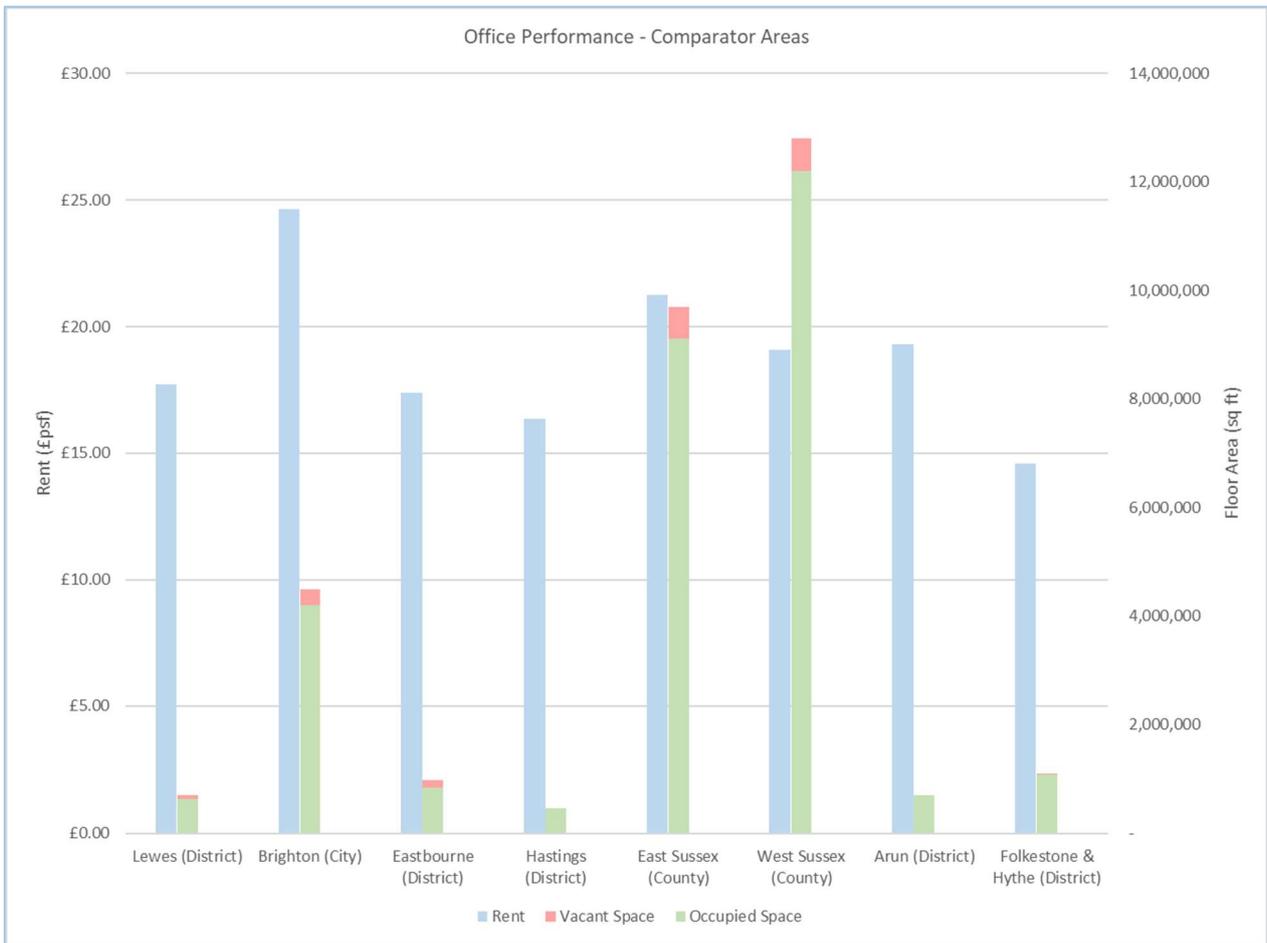
Only one office investment purchase has taken place in the past 12 months in Lewes. This is emblematic of the location, with very few properties typically trading here in an average year.

Comparator Town Analysis

We have sought to analyse how Lewes District performs in comparison with a variety of similar regions, towns and cities nearby in order to provide additional context. This section will seek to provide that contextual basis through data, whilst identifying any notable points that we consider to be of value. It is important to note that all data within this subsection is sourced from Costar.

Firstly, we have sought to understand how Lewes’ office market performs by undertaking analysis of some key market performance statistics: Total floor area, vacancy rate and average market rent, all of which have been summarised in figure 04.

Figure 04 – Office Performance: Comparator Areas

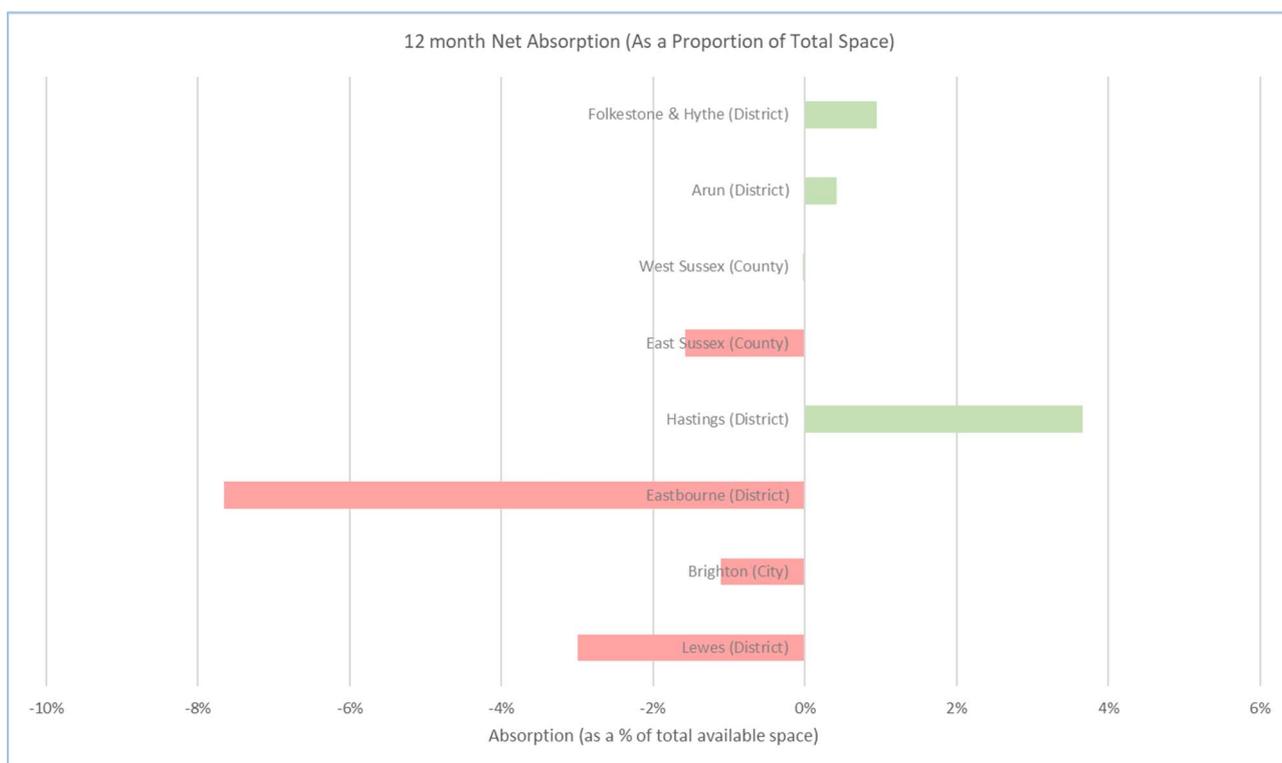


The overall provision within the District Council area is – at 697,000 sq ft – the second-lowest of all the comparator areas, with only Hastings having less office space. In spite of this small provision, Lewes’ vacancy rate is the second highest of all the comparator towns, at 8.5%. The only comparator area that has a worse vacancy rate is the Eastbourne Borough Council area, which has almost 6.5 times the amount of office space.

In spite of this poor vacancy rate, Lewes retains an average rent (at £17.70/sqft) that is broadly aligned with the majority of the comparator towns, ahead of Eastbourne, Hastings and Folkestone & Hythe, and only significantly behind Brighton and the East Sussex area as a whole (which Brighton will have a significant influence on due to it making up almost 50% of the office space in the region).

As with retail, the twelve month net absorption rate for office space in Lewes, relative to its size, is significantly higher than all centres other than Eastbourne, as outlined within Figure 05. Over 21,000 sq ft of office space has been vacated above the amount of space being let in Lewes in the last 12 months, which is equivalent to c. 3% of the total stock in the District Council Area.

Figure 05 – Twelve Month Net Absorption (As a Proportion of Total Office Space)



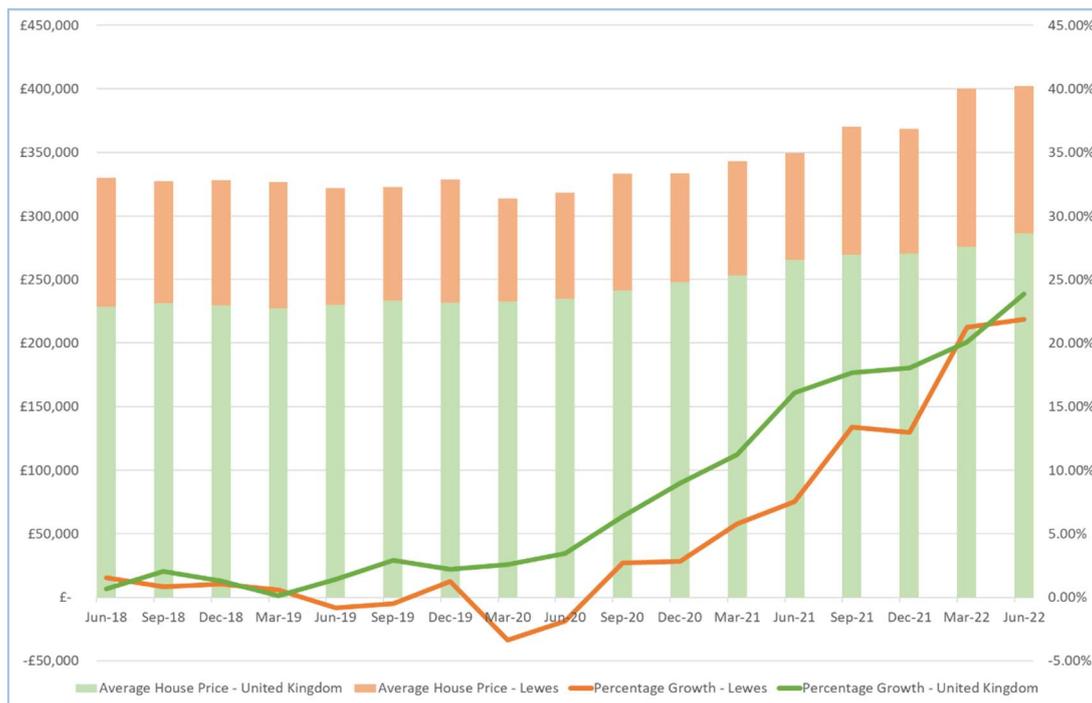
Office Market Conclusion

There is very little office space in Lewes relative to the national average, and it is not the primary market in East Sussex; Brighton in particular has a significantly larger stock of office space, and the majority of the comparator areas assessed above perform better both from a rental and a vacancy perspective. As such, and on the basis that the vacancy rate in the town has been increasing to record levels recently, it is inadvisable to seek to initiate or encourage office development in the District Council Area as it will likely result in further vacancies.

Residential Market Assessment

This section of the report provides an analysis of the housing market in Lewes, with a particular focus on recent house price changes and trends, and how these interact with the Lewes Housing Planning Policy documents. The information collected within this section will be used to further bolster the analysis within the report, as high demand and opportunities for population growth within the Lewes District Council area increase the potential to positively influence the growth and development of Lewes’ centres.

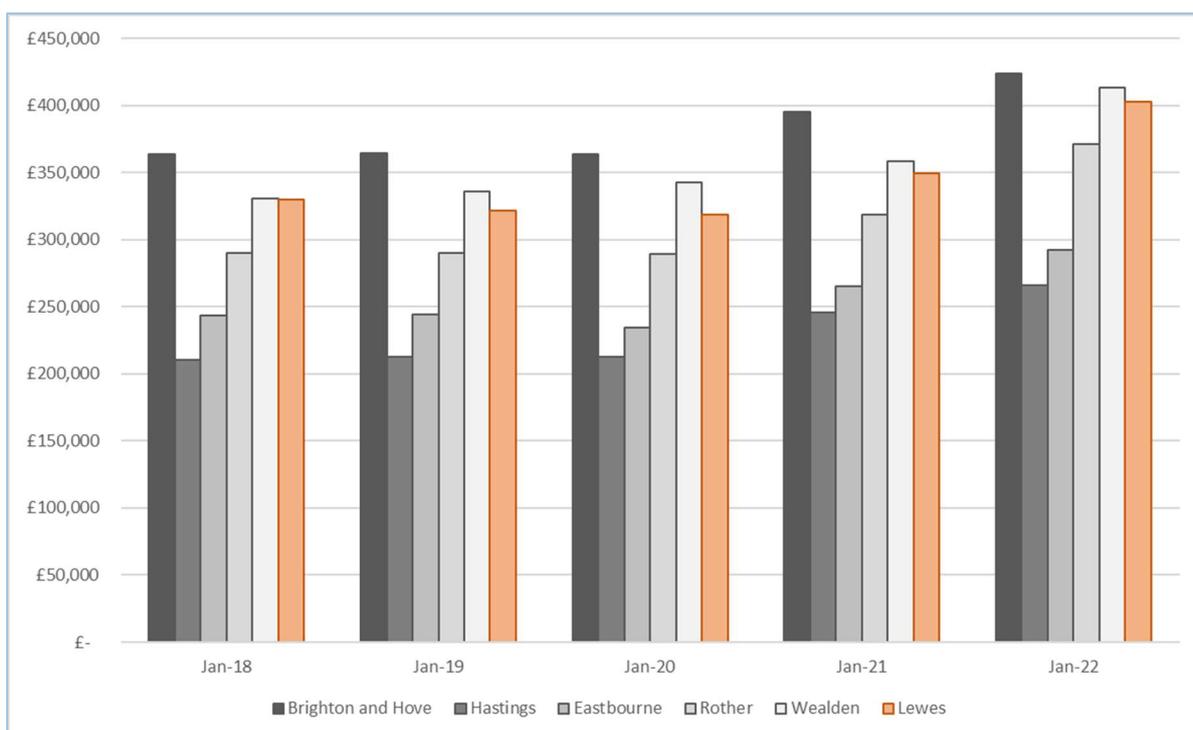
Figure 06 – Quarterly House Price Change vs. Average House Price: Lewes District Council Area & UK (Land Registry Data)



This graph demonstrates that the Lewes District Council area has seen a slower rate of house price growth than the average rate of growth for the UK as a whole throughout the two years between 2018 and 2020, to the extent that the house prices in this location trended downwards through that period. However, house price growth has accelerated at a faster rate than the UK average in the next three years to virtually catch UK growth as at June 2022.

This is only part of the story however, as Lewes has – in spite of the earlier slow growth – had house prices that are consistently some way above the UK average. In fact, over the course of the period assessed above house prices in Lewes never averaged less than 35% higher than the UK average, and peaked at 45% above the UK average in March 2022.

Figure 07 – Annual House Price Growth: Comparator Towns (Land Registry Data)



In spite of this impressive performance relative to the UK as a whole, the Lewes District is still not the highest-performing residential market in the broader East Sussex area, even when the Brighton & Hove area is disregarded. As the above graph demonstrates, Brighton & Hove has comfortably the highest sales values for houses in the local area, and Wealden is the second highest performing from the group.

These consistently high sales values have not been well reflected the homes market – according to the land registry, in the past 12 months 63 new homes have sold in Lewes – slightly more than five each month, compared with 1,497 total sales in the same region, meaning new homes in the last 12 months have accounted for less than 5% of all sales in the region. Delving deeper into this, there is a relative lack of new housing stock in the region; for example, Lewes Town’s only current new build development of scale is Southdowns Park, which comprises 102 homes. Beyond this, there are a handful of other new build schemes of scale in the region:

- Seaford Grange: 183 new homes by Bellway, on the outskirts of Seaford.
- August Fields: 85 new homes by Guinness Homes, on the outskirts of Peacehaven.
- Pelham Rise: 143 homes plus an outline application for a total of 307 homes on the outskirts of Peacehaven, currently being developed by Barratt.
- Caburn Fields: 66 new homes by Riverdale Estates in Ringmer.

There are a number of smaller developments by boutique/ SME developers in the region, however given the strong property market this is a relatively small development pipeline. We have therefore consulted the Lewes interim LAA 2022 report, which states that, of 252 sites assessed in the region, 193 were considered appropriate for housing, and only 15 of these were assessed as being deliverable or developable, with a further 30 potentially deliverable. This amounts to a potential additional 554 units as “developable”, of which over 50% of potential homes were situated on four sites in Ringmer, and a further 1,619 being “potentially deliverable”. We understand that the Council has received further sites since the publication of the interim LAA which could result in additional developable areas being brought forward that are not covered within this report.

This is a low number of deliverable new homes identified within the Lewes District area, and the concentration of most of these in one location could be a stumbling block for future growth for a number of the town centres assessed within this study, in particular given the market context of several of the commercial property sectors assessed within this report, although as noted above further sites may identify further developable sites and thus enhance the capacity for new homes within the Lewes District area.

4. TOWN CENTRE HEALTH CHECKS

Introduction

The health check audit has been informed by our own site inspections that were conducted in September 2022, and these inspections have been bolstered with various data sources including but not limited to Experian GOAD, the Property Market Information Service (“PROMIS”) reporting, COSTAR data, and town centre data collected and supplied by Lewes District Council.

This section of the report has regard for the health check indicators as follows:

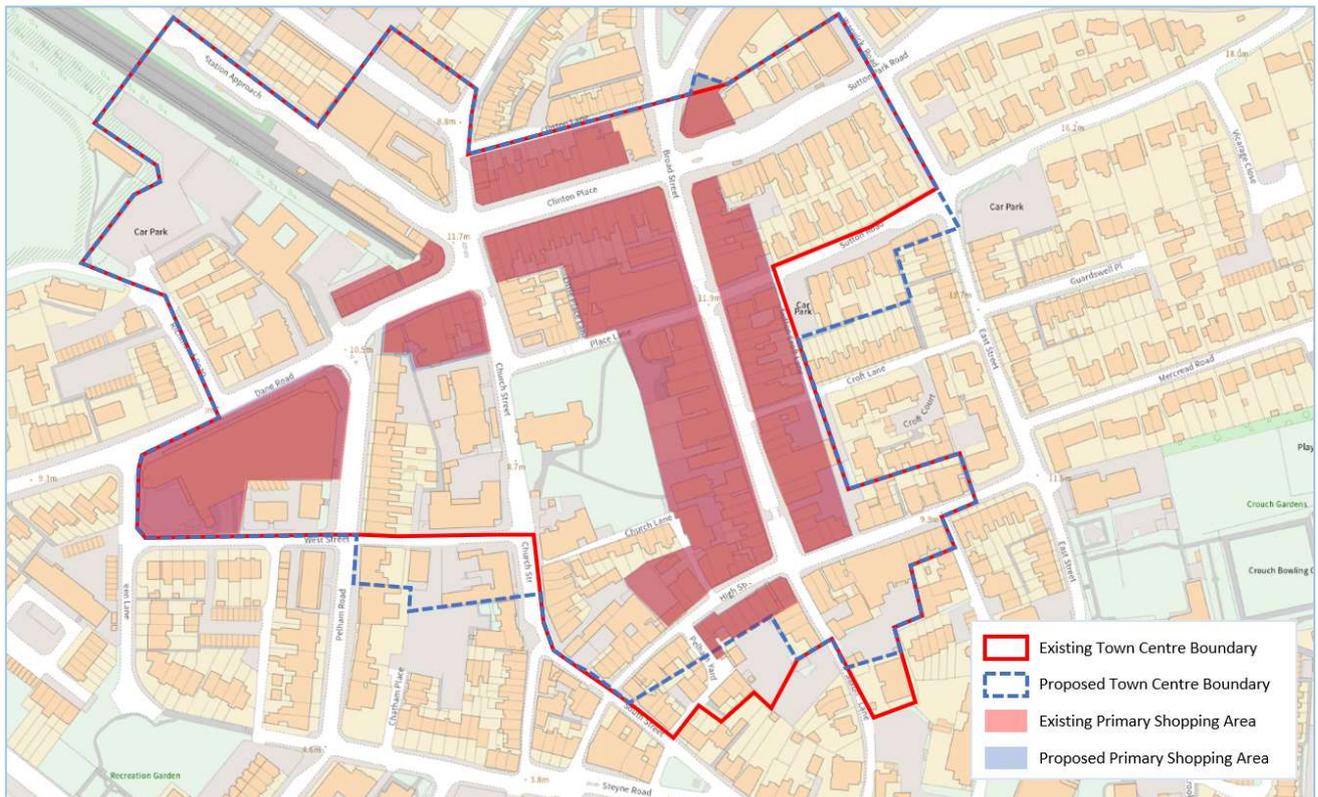
- Diversity of Uses
- Vacancy Levels
- Commercial Rents
- Retailer Representation & Demand
- Customers’ Experience & Behaviour
- Accessibility
- Environmental Quality
- Perception of Safety
- Opening Hours & the Evening Economy, and
- Barriers to Business Investment

Seaford Town Centre

Introduction/ Context

Seaford Town Centre is defined as a Main Town Centre, and is located on the south coast of England and at the southern boundary of Lewes District Council, approximately 8 miles west of Eastbourne, 10.9 miles east of Brighton and 7.8 miles south of Lewes. The boundary of this centre has been provided in figure 08. The red line in Figure 8 is the original Seaford Town Centre boundary, and the blue line is our proposed inclusions for the updated boundary. Further narrative regarding these changes is provided within Appendix IV.

Figure 08 – Seaford Shopping Centre Boundaries



As this map demonstrates, Seaford Town Centre is a large, retail focused centre around Broad Street, Clinton Place, and Church Street. The centre contains Seaford station, a large Morrisons Supermarket, and the aforementioned Broad Street forms the locus of the remainder of the retail offering, which houses a good mix of independent and national retailers. Away from the main retail streets, the roads are frequently narrow, and quickly turn from retail to residential – the current town centre boundary reflects this.

Diversity of Uses & Vacancy Levels

The diversity assessment of this centre, as summarised in figure 09 has been conducted using GOAD data and verified with site visits.

Figure 09 – Seaford Retail Composition (Experian GOAD data)

Use Categories	Units (Count)	Units (%)	Floorspace (sqft)	Floorspace (%)
Comparison	55	24%	85,200	21%
Convenience	20	9%	52,800	13%
Retail Services	39	17%	38,800	9%
Leisure	48	21%	79,600	19%
Financial & Business Services	26	11%	30,400	7%
Vacant	15	6%	93,609	7%

This town centre has a strong mix of different uses, and as one would expect for one of the larger centres in the Lewes and Eastbourne Council areas, this includes a strong proportion of comparison uses, with approximately a quarter of all space dedicated to this type of shopping.

Additionally, and of particular note are the number of leisure uses within this centre, which themselves comprise a healthy mix of different leisure uses. There are 11 restaurants, 13 cafes, 9 bars and pubs, and a number of other uses including a museum, several sports and leisure facilities and even a nightclub.

Convenience is only 9% of the town centre on a per unit basis, but slightly higher on a floorspace basis as a result of a very large Morrisons store on the edge of the town centre. This is supplemented by a Tesco Express, and a number of independent businesses such as bakers, butchers and convenience stores.

This centre has very low vacancy rates on both a per unit and a floorspace basis; for reference, the PROMIS 200 retail centre average vacancy rate is 19.1% of town centre units.

Commercial Rents

Coupled with the other town centre performance metrics included within this report, the level of rent which occupiers are prepared to pay for commercial space in a centre is a good indication of the strength of that centre.

Based on Costar data, market rents in Seaford Town Centre are currently at c. £20.70/sqft. Rents in the centres within this report range between £15.60 - £23.00/sqft, so this is towards the upper end of those figures. Given this centre is larger than many of the others in this report, and the £20.70/sqft figure is an average for the whole town centre area, we are therefore comfortable that this rental figure, in particular combined with the other analysis within this section, demonstrates Seaford has a healthy town centre.

Retailer Representation & Demand

PROMIS analysis does not cover this specific town centre, and as such we have conducted our own analysis of the centre, which has been set out in figure 10.

Figure 10 – Retail Provision: Key Stores in Seaford

Retail Provision - Site Visit September 2022				
Key Fashion Multiples	Key Non-Fashion Multiples	Food Stores	Key Café/ Restaurant Stores	Other Key Multiples
	Clearwell Mobility	Morrisons	Domino's Pizza	Phillip Mann
	Boots Pharmacy	Co-op		Co-op Funeral Care
	WHSmith	Tesco Express		Halifax
	Superdrug			Coral
	Specsavers			Santander
	Inter Sport			Nationwide
				HSBC
				Brewers Decorator Centre
				Fox & Sons

This is a large retail centre, one of the largest in the Lewes District area, and its retail provision is proportionate to such a centre, with a number of large national multiple businesses. These include three supermarkets, of which one is a very large Morrisons, and two mini-supermarkets. In terms of comparison retail, there are no large fashion multiples and the majority of the non-fashion multiples relate to health and beauty, pharmacies or similar comparison goods. There are no major cafes or restaurant businesses, but one take away, Domino's.

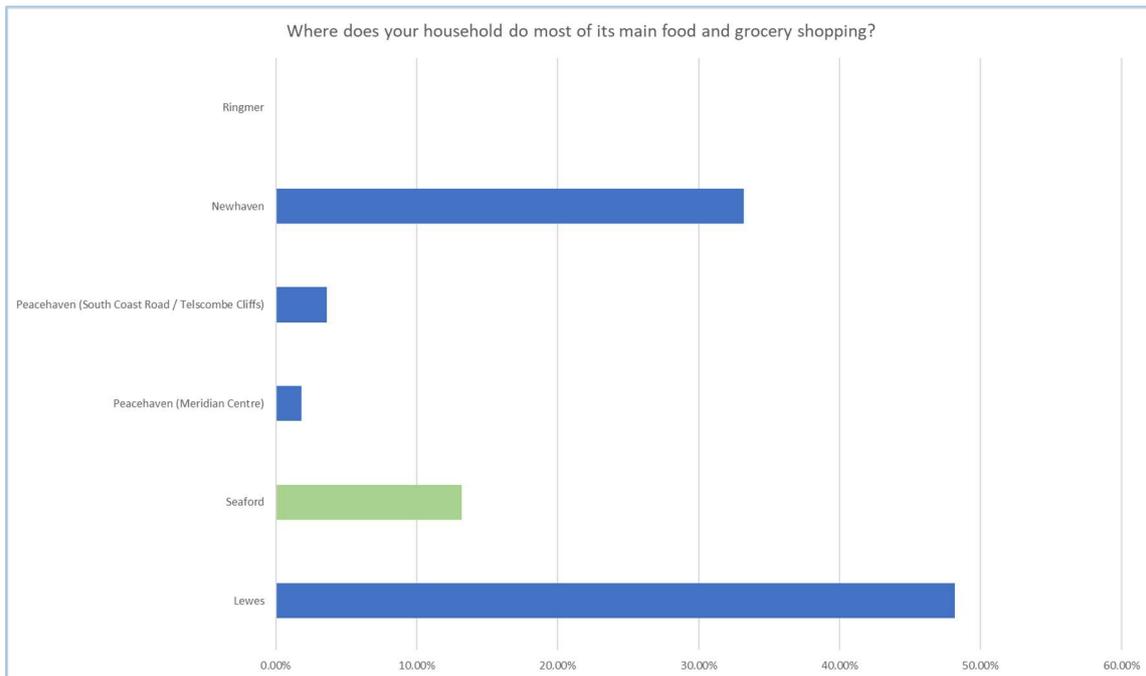
Finally, there are several large banks still present in the town centre, and some local/ regional estate agents.

Customers' Experience & Behaviour

The 2022 household survey commissioned to inform this study asked a number of specific questions about where respondents shop, the methodology of which has been outlined in Section 5 of this report. The survey results are included in Appendix iii, and section 6 of this report provides our analysis of the survey-indicated shopping patterns. This survey has been undertaken for Lewes and Eastbourne collectively.

The first question asked in this survey is "where does your household do most of its main food and grocery shopping?". As noted above, this question has been asked to inhabitants of both Lewes and Eastbourne, and so answers include centres within Eastbourne – and further afield. For this question, we have isolated the centres included within the study, plus Lewes in order to understand how Seaford performs relative to others within the Lewes district area. These answers have been summarised in figure 11, with this centre highlighted in green.

Figure 11 – Responses to: “Where does your household do most of its main food and grocery shopping?” filtered for Lewes District Council areas

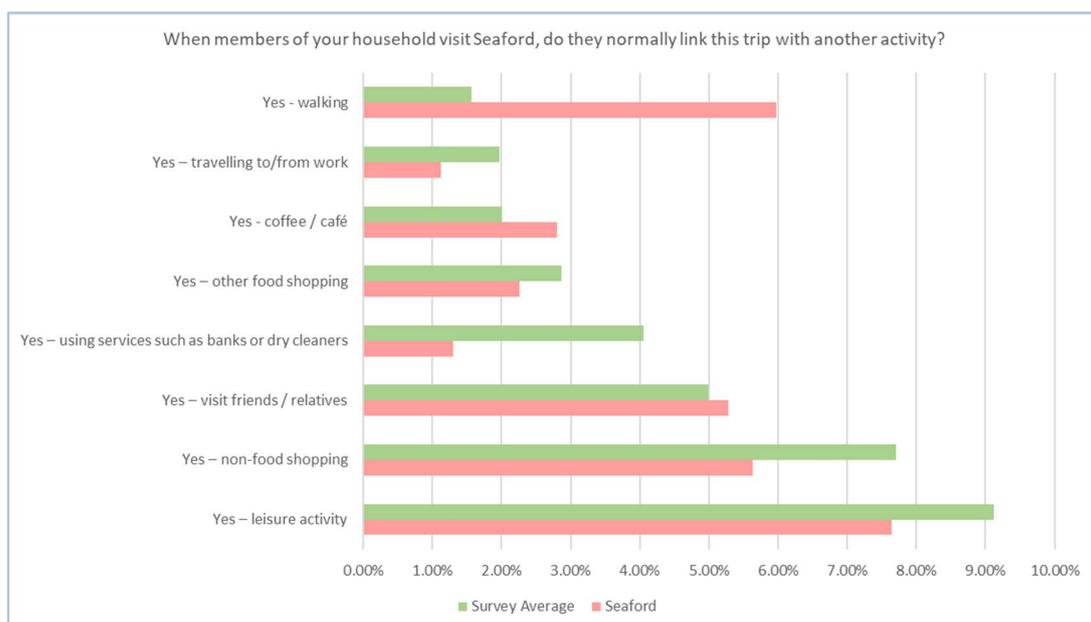


This demonstrates that – according to the household survey – Seaford is the third-most visited town centre for food and grocery shopping in the Lewes district area, albeit some way behind Lewes and Newhaven.

Additionally, the survey indicates Seaford is the second-most visited centre for shopping and services in the Lewes District area after Lewes itself, with 73 respondents answering that this is their primary shopping centre, compared with 195 in Lewes. Of these respondents, the majority are frequent visitors to this centre with 70% visiting either daily, several times a week or weekly. The majority of these respondents (c. 65%) travel to the centre by car, which is aligned with the overall average for the survey; fewer people (17.42%) walk to this centre than the average for the survey.

The number of visitors to Seaford linking their trip to another activity is – overall – lower than the survey average. Figure 12 summarises the uses that people link to their principal shopping trip, compared with the survey average.

Figure 12 – Responses to: “When members of your household visit Seaford, do they normally link this trip with another activity?”



As this figure demonstrates, the trips being linked to town centre visits in Seaford are generally below the survey average, but those that are above average are activities that do not involve directly engaging with the town centre retail or services, and so whilst they may involve increased time spent in the town centre, it is frequently not in a context of increasing expenditure within the town.

In terms of what respondents like about Seaford town centre, there is no real consensus, with all respondents choosing different features, with the exception of people selecting “Nothing/ Very Little” at 29% of respondents. Conversely, 16.7% of respondents answered what they would improve about Seaford with “more or better shops”, and 38.7% stating “nothing/ no improvements”.

Accessibility

Seaford Town Centre is accessible by car, rail, bus and walking.

Seaford Station is situated at the town’s western boundary. This station provides predominantly local services from the town on the Seaford Branch Line to Lewes, where it joins to national rail services north to the wider United Kingdom, or south to Brighton. Multiple bus services run through the town, including a route between Hove and Eastbourne, and several local services.

There is one key arterial route into Seaford, the A259, which runs east to west through the town centre, and provides access to Newhaven/ Peacehaven and Eastbourne and beyond. To the north, Alfriston Road – a small local road – provides access to the A27. Car parking in the town centre is relatively limited: there is a small amount of restricted on-street parking, a small car park at the station, an underground customer only car park for the Morrisons store, and approximately 160 additional spaces in three paid car parks on the outskirts of the town.

Environmental Quality

Seaford Town Centre is generally a well-maintained, attractive centre, and as highlighted in the Diversity of Uses & Vacancy Levels above, the vacancy rate in the town centre is very low, leading to the perception of a healthy, well-used centre.

Whilst there is a lot of traffic along the A259, which runs through the centre of the town, this is due to traffic management generally successfully funnelling much of the traffic along this road instead of the other – more regularly used for retail – roads in the centre. For example, Broad Street and High Street – whilst open to traffic – are for the most part quiet and easy to cross for those shopping in the area.

The principal weak point for Seaford from an environmental perspective is the lack of green space, planting or areas in which to stop and relax. Whilst traffic interference in the main retail thoroughfares is low, there are still vehicles parked on all these streets and as the majority of these streets are very narrow, this is to the detriment of the environmental quality, in particular for pedestrians. However, a significant positive for visitors to the town, there are a number of well-maintained public toilets that are free to use.

Perception of Safety

We identified no significant adverse issues with regards to safety or security during our inspections, which were conducted during the day, and our perception of the town centre was that this is safe.

Figure 13 – Crimes Per Month: Seaford Central



Figure 13 shows the monthly crime rate for the past 12 months for the Seaford Central area – which includes this centre – sourced from the Sussex Police website. Monthly crimes peak at c. 48 reports per month, with the average rate generally below that figure; this is consistent with other centres assessed in this report.

Opening Hours & the Evening Economy

Most of Seaford Town Centre’s shops and other attractions are open throughout the week. The main food store within the town centre is Morrisons on Dane Road, which is open from 07:00 until 22:00 Monday – Saturday, and has reduced hours on Sunday.

Seaford’s evening economy is relatively strong, there are 11 restaurants within the town centre area, the majority of which are open until 21:00-22:00. There are nine bars/ pubs, all of which are open until the late evening on both weekdays and weekends, in addition to a single nightclub. This late night economy is served by ten fast food/ takeaway restaurants.

Barriers to Business Investment

On our site visit, we noted that the centre does have some potential barriers to new businesses opening and/ or existing businesses expanding, which are likely to include:

- A lack of vacancies limits opportunities for new businesses to move to the area, however whilst the percentage of vacant units compared with the overall provision within the town centre is low, there are still 15 units available.
- Several large businesses in the area, such as the Morrisons, create a risk of new businesses being out-competed, although as one of the largest centres in the region the number of town centre users likely negates this risk.

New Development & Investment Proposals

There have been no commercial developments of scale in this centre in at least the last ten years, and it is our understanding that there are no proposals for additional investment or development in the near future.

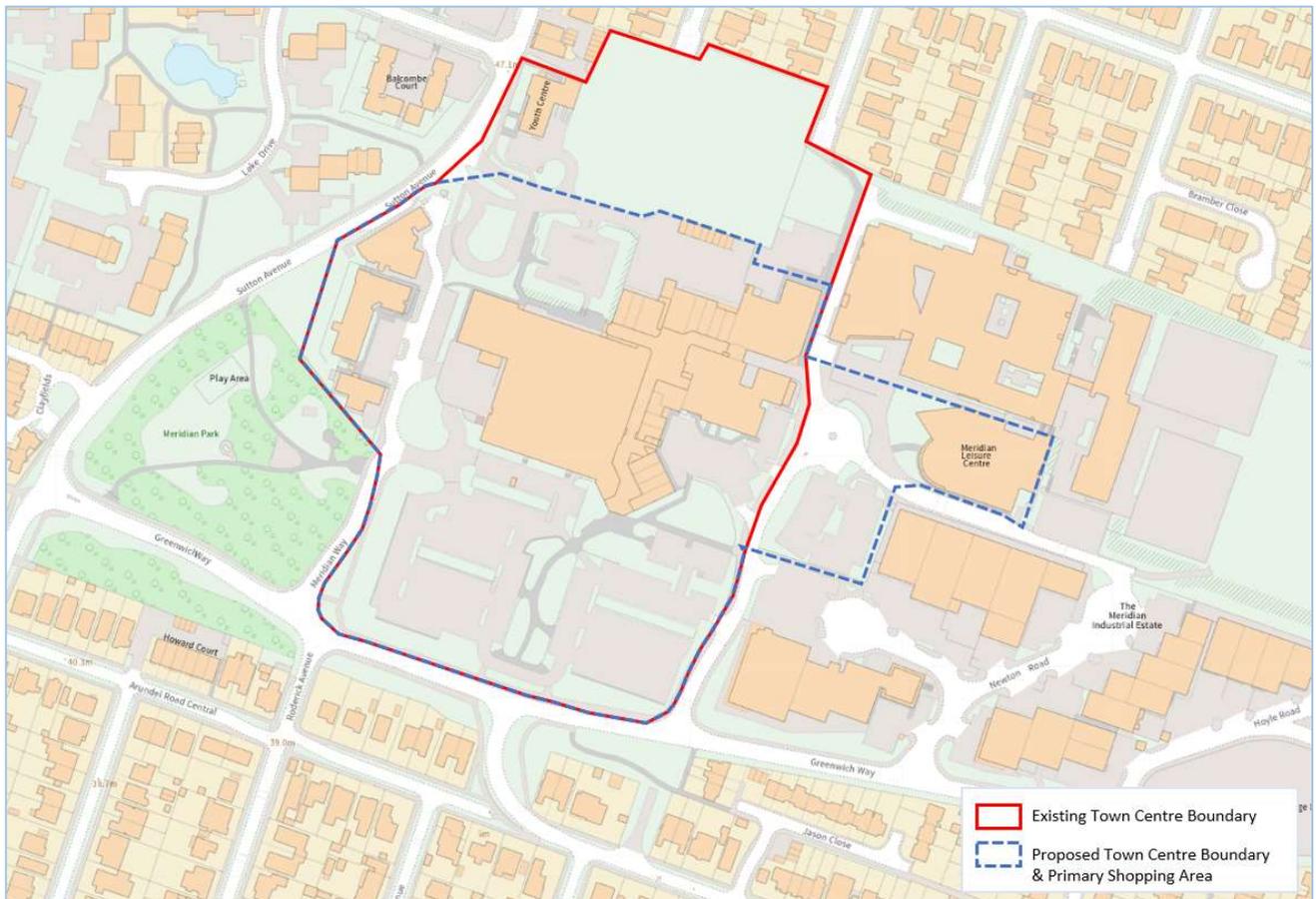
There has however been one small residential-led development on the northern boundary of the town centre. In 2015 an application was granted for conversion of a garage into 38 retirement homes.

Peacehaven (Meridian Centre)

Introduction/ Context

Peacehaven (Meridian Centre) is a District Retail Centre that principally comprises a shopping centre and its surrounding car parking, with a leisure centre to the east of the shopping centre that has its own separate car parking provision.

Figure 14 – Peacehaven (Meridian Centre)



The main anchor for the shopping centre is a large Co-op food store, and the centre also houses a large Council Office and Community Centre, in addition to a library. Beyond these alternative commercial uses, a large proportion of the shopping centre is vacant.

The centre is situated in the centre of Peacehaven, a small town that predominantly comprises low-density, single storey housing, and alongside Peacehaven (South Coast Road/ Telscombe Cliffs) is the largest provision of commercial space within the town; the Co-op food store is the only large supermarket in the local area. Outside of the western boundary is a school and a large industrial estate.

Diversity of Uses & Vacancy Levels

This centre has very low provision of active retail uses for a shopping centre, with the vast majority of the active space taken up by the Co-op supermarket, plus services/ offices such as the library, council offices and community centre. On the outside of the main shopping centre, to the east, there is a large leisure centre that we propose should be included within the town centre boundary.

Figure 15 – Peacehaven (Meridian Centre) Retail Composition (Experian GOAD data)

Use Categories	Units (Count)	Units (%)	Floorspace (sqft)	Floorspace (%)
Comparison	4	15%	4,600	3%
Convenience	2	8%	46,900	35%
Retail Services	4	15%	4,700	3%
Leisure	4	15%	32,900	24%
Financial & Business Services	0	0%	0	0%
Vacant	7	27%	7,700	6%

Whilst the vacant space is low on a per square foot basis, it is very high on a per unit basis – in fact vacant units comprise the largest proportion of the different use categories within the table above. This influences the overall perception of the centre, which has a lot of blank frontages and vacant storefronts.

Commercial Rents

Coupled with the other town centre performance metrics included within this report, the level of rent which occupiers are prepared to pay for commercial space in a centre is a good indication of the strength of that centre.

Based on CoStar data, market rents in the Peacehaven (Meridian Centre) centre are currently at c. £15.60/sqft. This is the lowest rental figure of all the town centres assessed within this report, which aligns with our perception of the town centre as struggling, in particular when examined alongside the high vacancy rates.

Retailer Representation & Demand

There are very few businesses in this centre due to the high vacancy rate. There is however one major multiple, in the Co-op supermarket and funeral directors. The remainder of the businesses are either small multiples or independents.

Customers' Experience & Behaviour

The 2022 household survey commissioned to inform this study asked a number of specific questions about where respondents shop. The survey results are included in Appendix iii, and section 6 of this report provides our analysis of the survey-indicated shopping patterns. This survey has been undertaken for Lewes and Eastbourne collectively.

As described in the diversity of uses and vacancy levels subsection above, this centre has a very high vacancy rate on a per unit basis, and this alongside the predominant tenant being the Co-op affects the answers received regarding this centre:

- Firstly, the principal reason people visit this centre is for food shopping, however this number is still very low at 0.5% of all survey respondents.
- Secondly, the majority (0.5% of all survey respondents) do not cite this centre as being their primary destination for shopping and services.
 - o Those people that do cite this as their principal shopping and services destination all live in Zones 6 and 7 – Peacehaven and Newhaven, indicating that people do not travel far to this centre. A map of these zones has been provided for reference at Figure 32 of this report, within Section 5: “Retail Needs: Approach & Baseline Evidence”.

Accessibility

Peacehaven (Meridian Centre) is predominantly accessible by car, on foot, or by bus. The centre has a significant amount of dedicated car parking, both for the shopping centre itself and separate parking for the leisure centre, and it is served by Sutton Avenue, which is a main road that provides access onwards to the A259 to the south.

The centre has a bus stop directly outside the Meridian Centre, with buses providing access around Peacehaven itself, and onwards to Newhaven and Seaford to the east, and Brighton to the west.

Environmental Quality

Peacehaven (Meridian Centre) principally comprises a shopping centre and its surrounding car parking, with a leisure centre and its own car parking provision to the east of the shopping centre. The shopping centre itself is mostly well-maintained, but the overarching issue from an environmental quality perspective is the very high vacancy rate, which leads to much of the centre being dark corridors with blank frontages.

Outside the centre, whilst the large amount of planting and green space in the car park is a positive, it does shorten sight lines and create lots of dark spaces and hidden corners that undermine the perception of safety within the centre.

Perception of Safety

We identified no significant adverse issues with regards to safety or security during our inspections, which were conducted during the day, and our perception of the town centre was that this is relatively safe, however there are several concerns, including the aforementioned issues surrounding the shortened sight lines, dark spaces and hidden corners that undermine the perception of safety within the centre.

Figure 16 – Monthly Crime Rate: Peacehaven West And North



Figure 16 shows the monthly crime rate for the past 12 months for the Peacehaven West And North area – which includes this centre – sourced from the Sussex Police website. Monthly crimes have recently been rising, hitting a peak of c. 95 reports in September 2022. The average rate has generally been below that figure at nearer 50 reports per month. This is towards the higher end of the reporting figures within this report and aligns with our perception of the town.

Opening Hours & the Evening Economy

The main shop in this centre is the large Co-op supermarket, which is open between 07:00 and 22:00 daily with the exception of Sundays, when it is open for reduced hours. There is very little else within this centre that contributes to the evening economy within this centre, and the remainder of the retail units that are occupied keep regular opening hours.

Barriers to Business Investment

On our site visit, we noted that the centre does have some potential barriers to new businesses opening and/ or existing businesses expanding, these are likely to include:

- A significant number of vacancies indicates the centre is struggling to attract enough customer footfall to maintain more retail.
- This is verified by our customers' experience and behaviour survey, which indicates that in spite of this centre's relative size, a very low number of respondents consider this to be their primary grocery or shopping centre.
- The vacancy rate, as well as the low environmental quality of this centre, create a perception of a lack of vitality that will likely make this centre unappealing to new businesses and prospective shoppers.

New Development & Investment Proposals

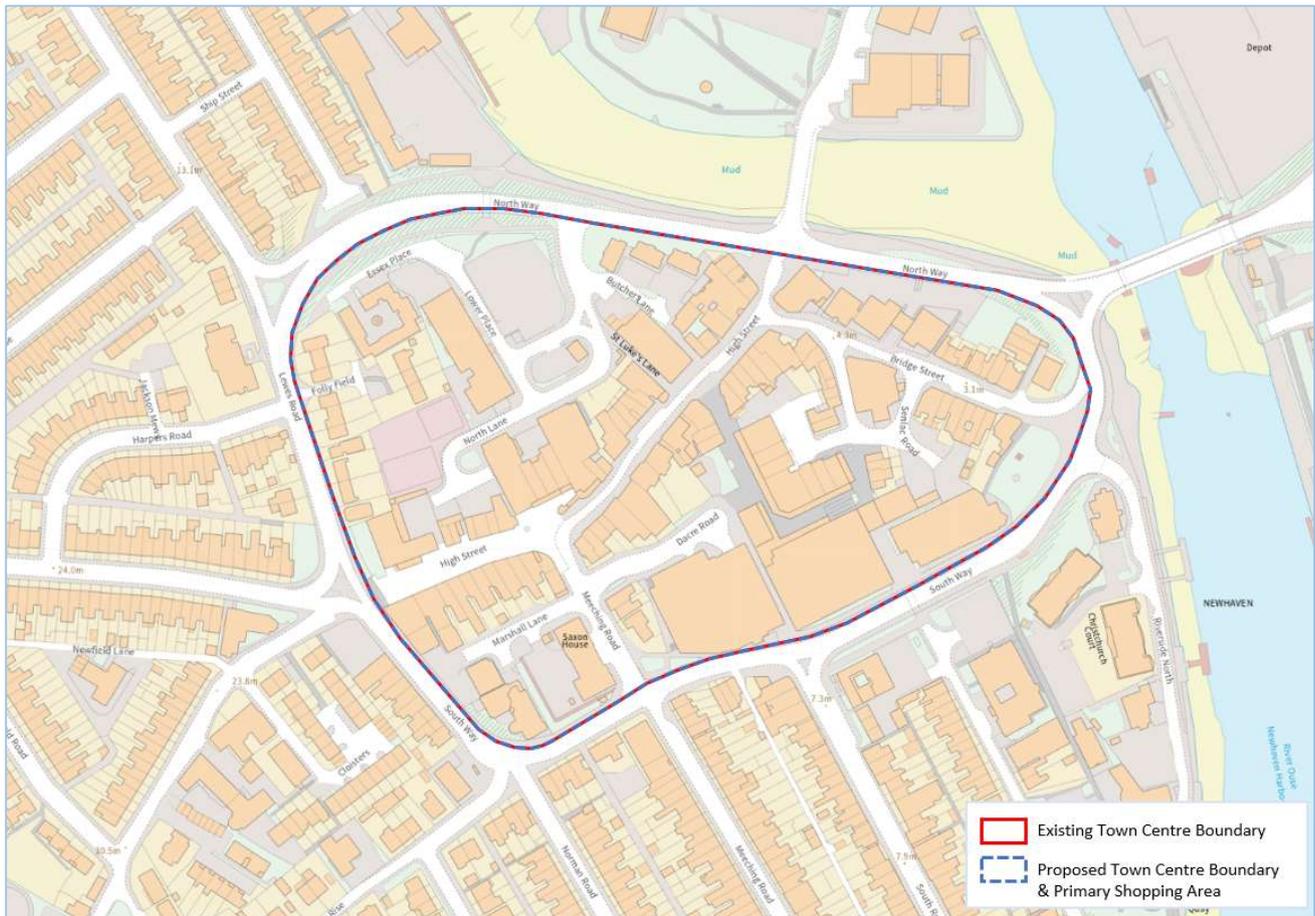
There have been no developments of scale in this centre in at least the last ten years, and it is our understanding that there are no proposals for additional investment or development in the near future.

Newhaven Town Centre

Introduction/ Context

Newhaven Town Centre is a District Retail Centre situated within Lewes District Council, between Peacehaven to the west and Seaford to the east. The town centre boundary as depicted in the map below follows the ring road around the – predominantly pedestrianised – retail centre of Newhaven.

Figure 17 – Newhaven Town Centre



The town centre is one of the primary clusters of retail in the town, however it is segmented by the River Ouse to the east from both Newhaven Town train station and a large retail warehouse development that contains a number of national retailers such as The Range, B&Q, and Sainsbury's, amongst many others.

On the date of our visit, the multi-storey car park and adjacent shopping centre to the south of the town centre were both closed due to long-term redevelopment; these works significantly reduce the current retail provision within the town, and have resulted in vacancies in a large number of the centre's shops. Once complete, these works will see an increase in the town's higher-quality retail provision and if successful should positively contribute to the overall quality of the town centre.

Diversity of Uses & Vacancy Levels

The diversity assessment of this centre, as summarised in the table below has been conducted using GOAD data and verified with site visits. This table demonstrates a relatively even split in the number of units across various different uses, in particular between comparison, retail services and leisure uses.

Given the relatively small size of the centre (c. 134,000 sq ft total commercial provision), the variance of services offered within each of these uses is relatively broad, for example in the comparison uses there are chemists, a florist, a

Poundstretcher and a textiles shop – although it is important to note these uses focus predominantly on cheaper, daily comparison goods rather than higher-end consumables.

There are few convenience uses within this centre, and particularly notable is the lack of any supermarket or similar within the town centre, and the closest to this type of provision is the Morrisons convenience store. Much of the grocery provision is outside of the town centre to the east, with the town centre instead having convenience shops such as bakeries, off licenses and tobacconists. There is a fruit and vegetable market at the top of the high street on Thursdays and Saturdays.

Figure 18 – Newhaven Town Centre Retail Composition (Experian GOAD data)

Use Categories	Units (Count)	Units (%)	Floorspace (sqft)	Floorspace (%)
Comparison	12	13%	16,900	10%
Convenience	7	8%	9,400	5%
Retail Services	15	17%	14,900	9%
Leisure	19	21%	41,900	24%
Financial & Business Services	10	11%	10,800	6%
Vacant	18	20%	34,490	20%

This centre has high vacancy rates on both a per unit and a floorspace basis; for reference, the PROMIS 200 retail centre average vacancy rate is 19.1% of town centre units, and this town centre is above that level. This is also the second-highest vacancy rate on a per unit basis and the highest on a floorspace basis within this analysis, and is significantly above the 6% and 7% vacancy rates on a unit and floorspace basis in the most comparably sized (albeit larger) centre of Seaford.

Commercial Rents

Coupled with the other town centre performance metrics included within this report, the level of rent which occupiers are prepared to pay for commercial space in a centre is a good indication of the strength of that centre.

Based on CoStar data, market rents in Newhaven Town Centre are currently assessed at c. £16.60/sqft. This is the second lowest rent for a centre assessed within this report, and thus further verifies our conclusions that this centre is currently struggling.

Retailer Representation & Demand

PROMIS analysis does not cover this specific town centre, and as such we have conducted our own analysis of the centre. There are very few multiples present within this centre, with only four of the 90 retail units (4.4%) identified on our site visit classified as major multiples. Those multiples are as follows:

- Boots
- Poundstretcher
- Morrisons Daily
- Co-op funeral care

The remainder of the let units are occupied by businesses that are either small independents, or charity shops. Whilst independent shops can be a signifier of a successful town centre, the notable number of charity shops paints a slightly more negative picture. Charity shops find it easier to stay open in struggling towns as their charitable status permits them a minimum 80% business rates relief. As such, a concentrated cluster of such businesses not only negatively affects the

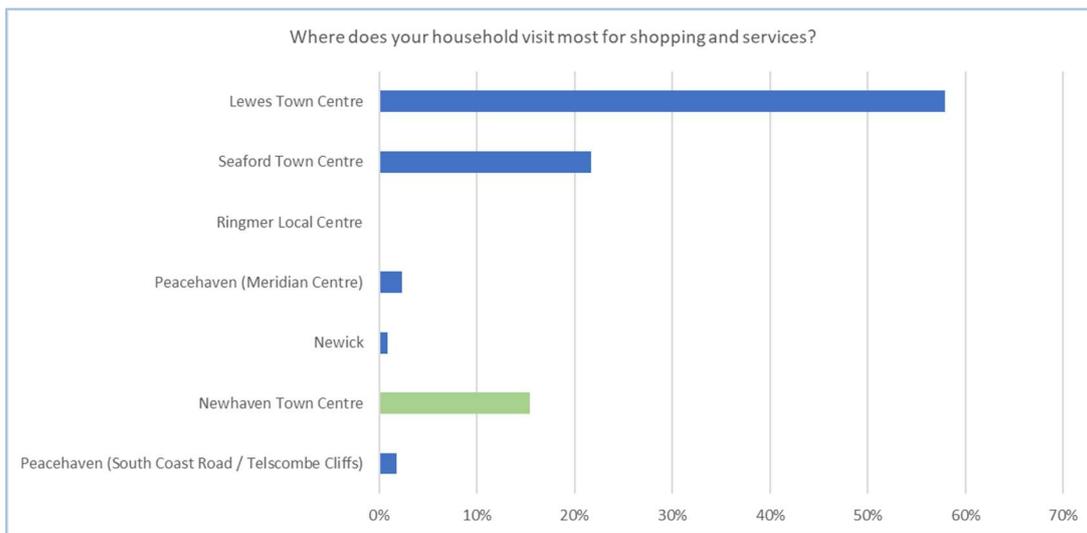
perception of diversity within a town centre, but also – alongside other indicators such as high vacancy rates and low rents – can indicate an underlying issue with the health of a town centre such as is the case in Newhaven.

Customers’ Experience & Behaviour

The 2022 household survey commissioned to inform this study asked a number of specific questions about where respondents shop. The survey results are included in Appendix iii, and section 6 of this report provides our analysis of the survey-indicated shopping patterns. This survey has been undertaken for Lewes and Eastbourne collectively.

Newhaven town centre is the third most cited centre in Lewes for shopping and services, and whilst it is significantly behind Lewes, it does compare favourably to Seaford Town Centre, as demonstrated by Figure 19 overleaf.

Figure 19 – Responses to: “Where does your household visit most for shopping and services?”



When asked what it is about Newhaven that these respondents enjoy, the most frequent response (16.4%) cited the traffic free pedestrian area of the town centre as being a positive, with good food stores second at 8.6%, however it is important to note that the considerable majority (37.8%) of respondents answered this question by stating that there was “nothing/ very little” that they liked about the centre. This is significantly higher than the average rate across all centres, which sits at 17.1% of total respondents.

The overwhelming majority of respondents (50.5%) to the question of what could be improved with Newhaven town centre answered “more or better shops”, which is significantly above the average proportion of responses to this question within the dataset, of 19.1%. Second to this was “fewer empty shops” with 16.4% of respondents. These answers with our overall perception of the town centre and present relatively clear examples of how the town centre retail area can be improved.

Accessibility

Newhaven is a predominantly pedestrianised town centre with several small roads providing car access around the edges of the town centre. Much of the vehicular traffic through the town is funnelled around the centre along the ring road, or into one of the various small car parks either in or on the outskirts of the town centre. The principal car park is the Dacre Road multi-storey car park within the town centre.

At the time of our visit we noted there is a lack of clarity to the signage on the roads surrounding the town that makes access to parking difficult, which was further exacerbated by development works taking place on the principal town centre multi storey car park.

Numerous buses serve the town, providing services to Peacehaven, Rottingdean, Brighton, Seaford, Lewes, and Eastbourne.

Pedestrian access is good when inside the town centre itself as this area is either pedestrianised or mostly free of traffic, however the A259 ring road can make pedestrian access into the town centre difficult, as the road itself is busy, with lots of fast moving traffic. There are some designated crossing points, however these are infrequent and thus reduce accessibility, particularly for those with limited mobility.

Environmental Quality

Newhaven town centre is currently undergoing significant redevelopment that makes it difficult to accurately assess its environmental quality. The multi-storey car park and adjacent shopping centre are currently undergoing a large redevelopment that has left a significant portion of the town centre either as a building site, or with boarded up shops. Whilst as it stands this is a substantial negative to the environment within Newhaven, these works are seeking to improve the general quality of the town centre area. As such, this project does have the potential – longer term – to improve the overall quality of the town centre.

Away from the redevelopment site, the town centre area has lots of quite tired shop fronts, and a number of prominent retail vacancies, all of which detract from the perception of the town centre.

The principal positive from an environmental quality perspective for Newhaven is its predominantly pedestrianised town centre. This makes navigating the centre very easy and pleasant as a pedestrian, and as highlighted in the Customers' Experience & Behaviour subsection above, this is considered by users to be a popular feature of the town centre and one of its biggest strengths. However, Newhaven's pedestrianised area contains very little planting or street furniture to further enhance the attractiveness of the centre.

Finally, the outskirts of the centre are dominated by the small ring road. The road itself is busy, with fast moving, loud traffic, and this is to the detriment of the retail space that faces towards, or is in close proximity to, this road. Furthermore, the roads that link from the ring road into the town centre, such as Meeching Road, North Lane and Lower Place, are predominantly bound by the rear of the buildings within the centre proper, making for unattractive and unsafe-feeling entrances to the main retail areas.

Perception of Safety

We identified no significant adverse issues with regards to safety or security during our inspections, which were conducted during the day, and our perception of the town centre was that this was generally safe, although as highlighted in the Introduction/ Context and Environmental Quality subsections of this town centre assessment, the town centre is generally not maintained to a high standard and the overall vacancy rate combine to reduce the perception of safety in the town centre.

The Client has provided us with results from their commissioned Place Survey⁶ that covers the "biggest deterrents" to visiting Newhaven. It is important to note we have not had visibility of the methodology used or the overall quality of the methodology, and that Newhaven for the purposes of this survey covers the whole town rather than just the town centre, it is notable that antisocial behaviour is the primary deterrent to visiting, indicating the general perception of users of the town is that it is unsafe.

⁶ <https://yournewhaven.commonplace.is/proposals/results-from-place-survey/step4>

Figure 20 – Crimes Per Month: Newhaven Valley



Figure 20 shows the monthly crime rate for the past 12 months for the Newhaven Valley area – which includes this centre – sourced from the Sussex Police website. Monthly crimes peak at c. 50 reports per month, with the average rate generally below that figure; this is similar to the majority of centres assessed within this report, however the overall perception is still generally of a less safe town centre.

Opening Hours & the Evening Economy

Most of this centre’s shops and services are open for regular hours throughout the week. There is no major supermarket within the town centre that remains open for extended hours, however there are a combined ten fast food & takeaways, restaurants and pubs within the centre, all of which stay open later than 21:00 for the majority of the week.

Barriers to Business Investment

On our site visit, we noted that the centre does have some potential barriers to new businesses opening and/ or existing businesses expanding, these are likely to include:

- A significant number of vacancies indicates the centre is struggling to attract enough customer footfall to maintain additional retail.
- The vacancy rate, as well as the low environmental quality of this centre, create a perception of a lack of vitality that may make this centre unappealing to new businesses and prospective shoppers.
- The large retail park situated just to the east of the centre likely significantly negatively impacts upon the number of visitors to the centre.
- The extensive redevelopment of the town centre makes access difficult and limits the number of active frontages, although if successful this may become a benefit to the town once completed.

New Development & Investment Proposals

Newhaven has recently been successful in bids for funding to regenerate its town centre area, as follows:

- Future High Streets Fund: £5,004,938

Lewes District Council initially submitted a bid to renovate vacant and underutilised areas of Newhaven Square. A revised business case is currently being submitted to Government, which includes a new project called the Health and Wellbeing

Hub. This project would see Quayside Medical Practice, supporting wider regeneration and possible integration with Wave Leisure facilities. Construction is progressing in the former Co-Op building and renovation at Dacre Road Car Park is due to start soon.

- Newhaven Town Deal: £19.3 million

The first of these Town Deal projects has been completed; Newhaven FC's 3G pitch is now installed and ready for the start of the 2022/23 season. Newhaven Town Council states that much larger projects are on their way using the funding, including:

- *A new community and enterprise hub on the top floor of the library. The intention for this project is to create a town centre presence for Newhaven Town Council, a creative space for locals, and a community venue and meeting place. The objectives for the project include:*
 - o *increasing economic activity and value in the town centre by growing footfall,*
 - o *creating employment opportunities*
 - o *increasing community participation and democratic engagement within the town.*
- *A public realm and wayfinding improvement programme. This will seek to better connect key attractions, transport hubs and destinations within the town by (but not limited to):*
 - o *linking the town to the Train Station and Ferry Terminal,*
 - o *improving wayfinding and movement around the town centre itself*
 - o *improving the streetscape.*

Peacehaven (South Coast Road/ Telscombe Cliffs)

Introduction/ Context

Peacehaven (South Coast Road/ Telscombe Cliffs) is situated in the south of Peacehaven; a town that predominantly comprises low-density, single storey housing, and alongside Peacehaven (Meridian Centre) is the largest provision of commercial space within the town.

This centre is defined as a local centre, and is a linear retail parade along either side of South Coast Road, extending to approximately 0.5 miles in length. It is our understanding that there is currently no centre boundary for Peacehaven (South Coast Road/ Telscombe Cliffs); it is our understanding that there is no current boundary for this Town Centre and therefore we have depicted our recommended boundary in the map below to reflect the distribution of existing main town centre uses based on our site visits.

Figure 21 – Peacehaven (South Coast Road/ Telscombe Cliffs) With Annotated Proposed Boundary



Diversity of Uses & Vacancy Levels

The diversity assessment of this centre has been summarised in the table below, and has been conducted using GOAD data and verified with site visits.

This centre offers a good variety of different uses, with an even split of comparison and convenience space. The comparison goods stores include chemists, charity shops, several home furnishing shops, and electrical goods. Convenience stores in this centre include one large multiple in Sainsbury’s Local, smaller multiple retailers such as Co-op and Londis, and local convenience stores such as confectioners, delicatessens, and off licenses. There is no large supermarket beyond the Sainsbury’s at 11,700 sq ft, although there are several larger retailers on the outskirts of the town centre boundary.

A large proportion of the centre’s provision is dedicated to leisure uses, these include a small number of bars, cafes, pubs and restaurants, however the majority of these are fast food & take away uses. The largest proportion of uses within this centre are dedicated to retail services; the vast majority of these uses have been classified as “Health & Beauty”, which predominantly comprises barbers and beauty salons; beyond these uses, there are two dry cleaners, a filling station, and a post office.

Figure 22 – Peacehaven (South Coast Road/ Telscombe Cliffs) Retail Composition (Experian GOAD data)

Use Categories	Units (Count)	Units (%)	Floorspace (sqft)	Floorspace (%)
Comparison	12	13%	25,500	19%
Convenience	10	11%	23,000	17%
Retail Services	19	21%	14,300	11%
Leisure	16	18%	24,300	18%
Financial & Business Services	14	16%	14,300	11%
Vacant	6	7%	6,500	5%

This centre has very low vacancy rates on both a per unit and a floorspace basis; for reference, the PROMIS 200 retail centre average vacancy rate is 19.1% of town centre units.

Commercial Rents

Coupled with the other town centre performance metrics included within this report, the level of rent which occupiers are prepared to pay for commercial space in a centre is a good indication of the strength of that centre.

Based on Costar data, market rents in the Peacehaven (South Coast Road/ Telscombe Cliffs) centre are currently at c. £22.00/sqft. This is close to the upper end of rents for town centres assessed within this report, which aligns with our overall analysis that this is a healthy, strong retail centre.

Retailer Representation & Demand

PROMIS analysis does not cover this specific town centre, and as such we have conducted our own analysis of the centre, which has been set out in figure 23 below.

Figure 23 – Retail Provision: Peacehaven (South Coast Road/ Telscombe Cliffs)

Retail Provision - Site Visit September 2022				
Key Fashion Multiples	Key Non-Fashion Multiples	Food Stores	Key Cafés/ Restaurants	Other Key Multiples
None	None	Co-op Londis	Greggs Bakery Costa Coffee Subway Papa John’s Pizza Sainsbury’s Local	Ladbrokes Nationwide Building Society

This analysis demonstrates the primary multiples within this centre. The largest proportion of these national retailers comprises cafés and fast food/ take aways, and beyond these retailers there are two major supermarkets. The majority of the remainder of the businesses in this centre are smaller local multiples or small independents.

Customers’ Experience & Behaviour

The 2022 household survey commissioned to inform this study asked a number of specific questions about where respondents shop. The survey results are included in Appendix iii, and section 6 of this report provides our analysis of the survey-indicated shopping patterns. This survey has been undertaken for Lewes and Eastbourne collectively.

This survey indicates that the Peacehaven (South Coast Road/ Telscombe Cliffs) town centre is the fourth-most visited centre in Lewes for food and grocery shopping (Figure 24), albeit with a significantly lower proportion of the respondents at 1.1% of all answers than Lewes (14.1%), Newhaven (9.8%) and Seaford (3.9%).

Figure 24 – Responses to: “Where does your household do most of its main food and grocery shopping?”



Furthermore, three supermarkets contribute to the 1.1% total for Peacehaven (South Coast Road/ Telscombe Cliffs), but one of these supermarkets is the Tesco Express on Kirby Drive, which for the purposes of this report is outside of the town centre area. This Tesco Express is cited as being the primary food and grocery shopping location by 0.6% of respondents and therefore when disregarded for being outside the Town Centre area, the total for the Town Centre falls from 1.1% to 0.5% of all respondents; a total that is lower than Peacehaven (Meridian Centre).

As with food and grocery shopping, this centre is one of the least cited – with the exception of Ringmer and Newick which are very small villages – in response to the question “Where does your household visit the most for shopping and services”, and both of these factors combined indicate that this centre is not considered to be a primary destination for shopping in Lewes.

Accessibility

Peacehaven (South Coast Road/ Telscombe Cliffs) is most easily accessible by car due to being situated along a main road. The principal issue with accessing the town centre by car is the lack of dedicated parking; much of the parking in this centre is on-street parking that is limited to two hours, although there are some small car parks such as Roderick Avenue and Steyning Avenue Car Parks that allow slightly longer stays, and some of the larger businesses (Co-op, for example) has customer only parking.

There are numerous bus stops running the full length of South Coast Road, and these buses provide services to the local Peacehaven area, as well as onwards to Brighton and Eastbourne.

Environmental Quality

As highlighted in the introduction to this section, this is a linear centre running along South Coast Road – a main road that serves as one of the primary arterial routes between Newhaven, Peacehaven and on to Brighton. As such, the centre is dominated by this road, which has lots of vehicular traffic running the full length of the centre. Whilst there are several crossing points, this road does make travelling between shops difficult.

In terms of street furniture and planting, there is very little beyond the crossing points, and little to encourage people to spend time in the centre beyond visiting shops. The majority of the shops themselves are well maintained, and the general perception of the centre as at our site visit was of a healthy retail thoroughfare.

Perception of Safety

We identified no significant adverse issues with regards to safety or security during our inspections, which were conducted during the day, and our perception of the town centre was that this is safe.

Figure 25 – Monthly Crime Rate: Peacehaven West and North



Figure 25 shows the monthly crime rate for the past 12 months for the Peacehaven West and North area – which includes this centre – sourced from the Sussex Police website.

Monthly crimes have recently been rising, hitting a peak of c. 95 reports in September 2022. The average rate has generally been below that figure at nearer 50 reports per month. This is towards the higher end of the reporting figures within this report, and slightly contradicts our overall perception of the area based on our site visit, however it is notable that the Peacehaven West and North area does include a large area to the north that is outside of this centre.

Opening Hours & the Evening Economy

Most of this centre’s shops and services are open for regular hours throughout the week. The Sainsbury’s and Co-op mini supermarkets are open between 07:00 and 22:00 daily.

There are two pubs/ bars in the centre, both of which are open until 23:00 daily. There are two restaurants, Burger and Bird and The Road Shack – the former is open until 23:00 from Wednesday until Saturday, and the latter does not contribute to the evening economy as it is a daytime café. Beyond these businesses, there are six fast food & takeaway businesses which are mostly open beyond 21:00.

Barriers to Business Investment

We are not aware of any barriers to new businesses that are specific to this centre. However, on our site visit we did note that the low vacancy rate in this centre may mean there are limited opportunities to start a new business in this centre, or to expand a business into new larger premises.

New Development & Investment Proposals

This centre has seen several proposals within the last ten years, the majority of those proposals are for small scale development of single buildings on the street, and the large proportion of those proposals have either been rejected or withdrawn. The most notable exception is the following application:

- South Coast Road Industrial Estate, Bolney Avenue (2014): Demolition of a light industrial unit and erection of A1 retail units.
- 1-85 South Coast Road (2017): Demolition of 81-83 South Coast Road and construction of 3 storey mixed-use development with ground floor retail unit (A1) and 11 flats. This application is east of the centre along South Coast Road.

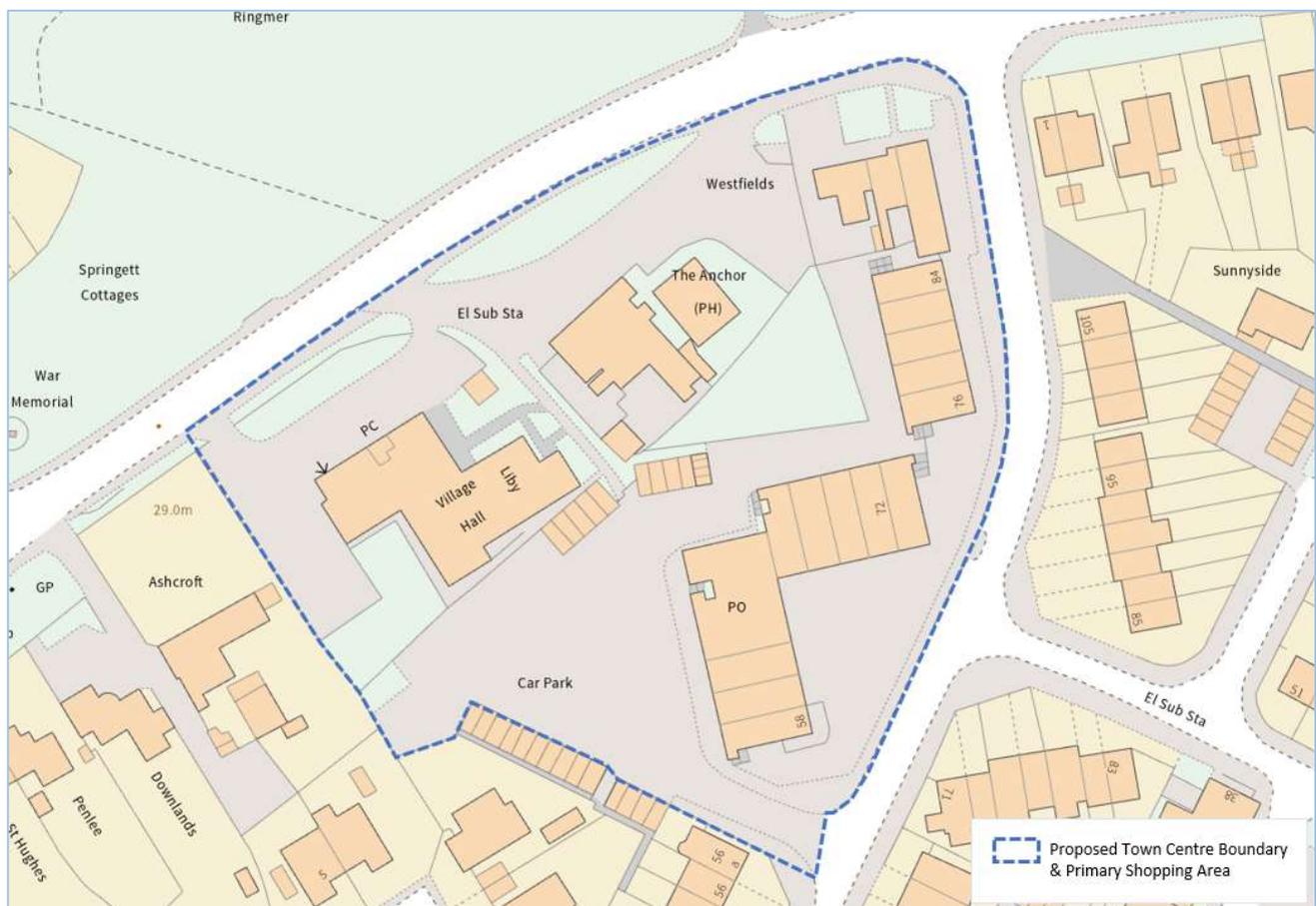
It is our understanding that there are no proposals for additional investment or development in the near future.

Ringmer

Introduction/ Context

Ringmer is a small village situated approximately 2.5 miles north east of Lewes town centre. The centre assessed within this document, which is defined as a local centre, has been depicted in the map below. Ringmer is the principal retail location for the village itself, which predominantly comprises low-density housing; as this is the largest village in the local area, the nearest retail centre of scale is Lewes. We have recommended a small change to this boundary to remove the garages to the south of the site.

Figure 26 – Ringmer, With Annotated Proposed Changes to Boundary



As with Peacehaven (South Coast Road/ Telscombe Cliffs) above, it is our understanding that there is currently no centre boundary for Ringmer; we understand this boundary has not been defined in the adopted local plan, and therefore our boundary as depicted in figure 26 is based on our site visits.

Diversity of Uses & Vacancy Levels

The assessment of the diversity of uses for this centre – as summarised in figure 27 – has been conducted solely on a per-unit basis as we do not have access to approximate floorspace areas for these units as provided by GOAD. This information

has been obtained from our site visits so is up to date and accurate. Given this is a small centre with relatively evenly sized retail units, we are content that this is an appropriate basis for this analysis.

Figure 27 – Ringmer Retail Composition (C&W Site Visit data)

Use Categories	Units (Count)	Units (%)
Comparison	1	6%
Convenience	3	18%
Retail Services	5	29%
Leisure	5	29%
Financial & Business Services	2	12%
Vacant	1	6%

As highlighted above, this is a very small centre and as such the diversity of uses is limited by the number of shops. However, the spread of uses within this centre is relatively even. It is appropriate for a centre of this size to have limited comparison uses, and in this centre the use is a small pet store rather than a high end electrical goods supplier, for example. The convenience uses within this centre include a butchers, a bakers and a small supermarket/ convenience store – this is a fair mix for such a centre, covering most of the bases that are required to serve a small local community.

The leisure uses include a restaurant, two take aways, a café and a pub. The majority of the retail services are assessed as health and beauty, which includes barbers and beauticians, and there are also two estate agents within the centre.

As at the day of our site visit, there was only one vacant unit.

Commercial Rents

Coupled with the other town centre performance metrics included within this report, the level of rent which occupiers are prepared to pay for commercial space in a centre is a good indication of the strength of that centre.

Based on Costar data, market rents in the Ringmer centre are currently assessed at c. £23.00/sqft. This is the highest rent of any town centre assessed within this report. This aligns with our overall analysis that this is a healthy, strong retail centre.

Retailer Representation & Demand

This is a very small centre, comprising only 17 retail units. Of these, only two are major multiples – Morrisons supermarket and Domino’s Pizza. All the remaining retailers are either small local/ regional multiples or independents.

Customers’ Experience & Behaviour

The 2022 household survey commissioned to inform this study asked a number of specific questions about where respondents shop. The survey results are included in Appendix iii, and section 6 of this report provides our analysis of the survey-indicated shopping patterns.

Likely as a result of Ringmer’s small size, this location does not show up as an answer to the questions on retail habits with any frequency, with the exception of small scale “top up” food and convenience goods items, where the centre had seven respondents (0.5% of total responses). This aligns with our conclusions that this is a centre that is extremely local, and not used beyond this small catchment area with any regularity.

Accessibility

There is designated car parking at this centre, however this is very limited and at the time of our visit was all occupied. Assuming this is a frequent issue, the nearest car parking is on residential streets surrounding the centre, which then

requires town centre users to walk for several minutes to access the retail area, limiting accessibility for those with limited mobility. Given this is a relatively local centre, with the significantly larger town of Lewes – with a commensurately large catchment area – nearby, it is likely that a proportion of users of this centre will be walking from nearby residential areas.

There are several bus stops in close proximity to the centre, providing services to Lewes, Hailsham, Brighton and north through Lewes to Tunbridge Wells.

Environmental Quality

Ringmer’s centre is of mixed quality. The majority of the retail provision faces eastwards onto Springett Avenue, on a wide paved area with a ‘town square’ type layout at the southern end. Behind this retail thoroughfare is the dedicated parking for the town centre in a small triangle. The town centre along this street is quiet and easily accessible to pedestrians because of the wide pavement, however the ‘town square’ area is of low environmental quality as it entirely comprises poorly maintained paving, with two benches the extent of the street furniture.

On the northern boundary of the centre the retail provision continues along Lewes Road. Whilst this part of the centre sits on a main road, these buildings are set back from the road thus mitigating its impact and providing lots of space for pedestrians. This part of the town centre also faces out onto a large village green which further enhances the environmental quality.

Perception of Safety

We identified no significant adverse issues with regards to safety or security during our inspections, which were conducted during the day, and our perception of the town centre was that this is safe.

Figure 28 – Monthly Crime Rate: Ringmer



Figure 28 shows the monthly crime rate for the past 12 months for the Ringmer area – which includes this centre – sourced from the Sussex Police website. This is among the lowest monthly reporting of crime in this report, which aligns with our perception of the centre on our visit as being very safe.

Opening Hours & the Evening Economy

Most of this centre's shops and services are open for regular hours throughout the week. The only businesses contributing to the evening economy in this centre are the single pub and the Domino's takeaway. However, the pub is open for relatively limited hours, closing at its latest at 20:00, and the Domino's is a predominantly delivery service, thus it is unlikely to significantly increase footfall to this centre in the evening.

Barriers to Business Investment

We have noted several observations from our site visit that may present issues for any new business looking to set up in this location:

- The centre itself is predominantly serving a local customer base, which puts a cap on both the number of prospective customers without nearby residential development, and also limits the types of use that will be appropriate in this location.
- Furthermore, this centre is very close to Lewes, which likely draws a significant proportion of potential customers away from this centre due to its increased size, retail provision, and therefore gravity.
- There are only eleven units, all but one of these is occupied, meaning it would be difficult for businesses to move to this location even if they wanted to.

New Development & Investment Proposals

There have been no commercial developments of scale in this centre in at least the last ten years, and it is our understanding that there are no proposals for additional investment or development in the near future.

Newick

Introduction/ Context

Newick is a small village that is defined as a Local Centre; it is situated approximately 3.4 miles west of Uckfield, 5.5 miles east of Haywards Heath and 6.7 miles north east of Burgess Hill. As with the two local centres above, it is our understanding that there is currently no centre boundary for Newick; we understand this boundary has not been defined in the adopted local plan, and therefore we have depicted our recommended boundary in the map below to reflect the distribution of existing main town centre uses based on our site visits.

Figure 29 – Newick With Annotated Proposed Boundary



This centre sits on the western edge of the town of Newick, and is centred around the village green, and then south along the Green and Church Road. The centre is surrounded by agricultural and other green land, and as such the nearest retail centres of scale are the aforementioned Uckfield, Haywards Heath and Burgess Hill.

Diversity of Uses & Vacancy Levels

The assessment of the diversity of uses for this centre – as summarised in the table (right) – has been conducted solely on a per-unit basis as we do not have access to approximate floorspace areas for these units as provided by GOAD. This information has been obtained from our site visits so is up to date and accurate. Given this is a small centre with relatively evenly sized retail units, we are content that this is an appropriate basis for this analysis.

Figure 30 – Newick Retail Composition (C&W Site Visit data)

Use Categories	Units (Count)	Units (%)
Comparison	1	9%
Convenience	3	27%
Retail Services	1	9%
Leisure	4	36%
Financial & Business Services	1	9%
Vacant	1	9%

This centre has a low level of diversity predominantly as a result of its small size. It houses three pubs, a Premier convenience store, a large café, an estate agency, a butcher, and several other small retail units, plus a single vacant unit.

Commercial Rents

Coupled with the other town centre performance metrics included within this report, the level of rent which occupiers are prepared to pay for commercial space in a centre is a good indication of the strength of that centre.

Based on Costar data, market rents in the Newick centre are currently assessed at c. £19.50/sqft. Rents in the centres within this report range between £15.60 - £23.00/sqft, so this is towards the middle/ upper end of those figures, thus suggesting this is overall a healthy, strong retail centre.

Retailer Representation & Demand

This is a very small centre, comprising only 11 retail units. Of these, there are no major multiples, and one small local/ regional multiple – a Premier Convenience Store. All the remaining retailers are small, local independents.

Customers’ Experience & Behaviour

The 2022 household survey commissioned to inform this study asked a number of specific questions about where respondents shop. The survey results are included in Appendix iii and section 6 of this report provides our analysis of the survey-indicated shopping patterns.

Likely as a result of Ringmer’s small size, this location does not show up as an answer to the questions on retail habits with any frequency. This aligns with our conclusions that this is a centre that is extremely local, and not used beyond this small catchment area with any regularity.

Accessibility

Newick is a very small centre, but with good road access via the A272 which bounds the centre to the north. Parking is very limited and is only on-street, although some businesses have one or two parking spaces for customers in front of their stores. Walking access is fair, although several streets – including Church Road – have no pavements on some stretches. Two bus routes serve this centre, providing services to Haywards Heath to the west and Uckfield to the east on the 31, and Lewes on the 121 route.

Environmental Quality

Newick is a very small centre, situated around a village green and along a small road. Properties are attractive, period buildings and are generally well-maintained.

Perception of Safety

We identified no significant adverse issues with regards to safety or security during our inspections, which were conducted during the day, and our perception of the town centre was that this is safe.

Figure 31 – Monthly Crime Rate: Newick



Figure 31 shows the monthly crime rate for the past 12 months for the Hamsey, Barcombe and Newick area – which includes this centre – sourced from the Sussex Police website.

This is among the lowest monthly reporting of crime in this report, which aligns with our perception of the centre on our visit as being very safe.

Opening Hours & the Evening Economy

Most of this centre’s shops and services are open for regular hours throughout the week. Very few businesses in this location will contribute to an evening economy, however there are three pubs in the village, all of which are open until 23:00 daily.

Barriers to Business Investment

We have noted several observations from our site visit that may present issues for any new business looking to set up in this location:

- The centre itself is clearly predominantly serving a local customer base, which puts a cap on both the number of prospective customers without nearby residential development, and also limits the types of use that will be appropriate in this location.
- There are only eleven units, all but one of these is occupied, meaning it would be difficult for businesses to move to this location even if they wanted to.

New Development & Investment Proposals

There have been no commercial developments of scale in this centre in at least the last ten years, and it is our understanding that there are no proposals for additional investment or development in the near future.

5. RETAIL NEEDS: APPROACH & BASELINE EVIDENCE

Introduction

This section outlines our approach to retail capacity forecasting. In accordance with our instructions, we have assessed retail needs for Lewes District including and excluding Lewes Town within the South Downs National Park (SDNP).

We then set out the baseline assumptions and forecasts underpinning the assessment of new retail (convenience and comparison goods) floorspace capacity in Lewes District / Lewes Town over the plan period.

Approach

Our assessment uses an Excel-based retail capacity model, applying the most up-to-date baseline evidence available including a new household telephone survey conducted by NEMS Market Research in March/April 2022.

This Study has been prepared in parallel with the [Eastbourne Borough Retail and Leisure Study 2022] as part of a joint commission from Lewes and Eastbourne Councils. It has therefore been possible, and more cost-effective, to design a household telephone survey covering the catchment area of the shopping destinations in both Lewes District and Eastbourne Borough.

Accordingly, and consistent with good retail planning practice, we forecast the expenditure-based capacity for new retail floorspace as follows:

- define an appropriate catchment area for Lewes District / Lewes Town (and Eastbourne Borough), sub-divided into 15 zones based on postcode sectors;
- calculate the total amount of convenience and comparison goods expenditure available within each of the 15 zones comprising the catchment area, at the base and forecasting years (as defined below);
- allocate the available expenditure to Lewes District / Lewes Town shopping destinations based on the results of the 2022 household telephone survey to estimate current sales and forecast future sales in each shopping destination;
- identify any committed developments (i.e. retail floorspace with planning permission and/or under construction) and assess their likely turnover contribution to future sales; and
- compare the estimated sales in the Lewes District / Lewes Town shopping destinations with existing floorspace, so as to assess the current trading performance of each shopping destination and the capacity to support additional convenience and/or comparison goods floorspace (after allowing for any committed developments).

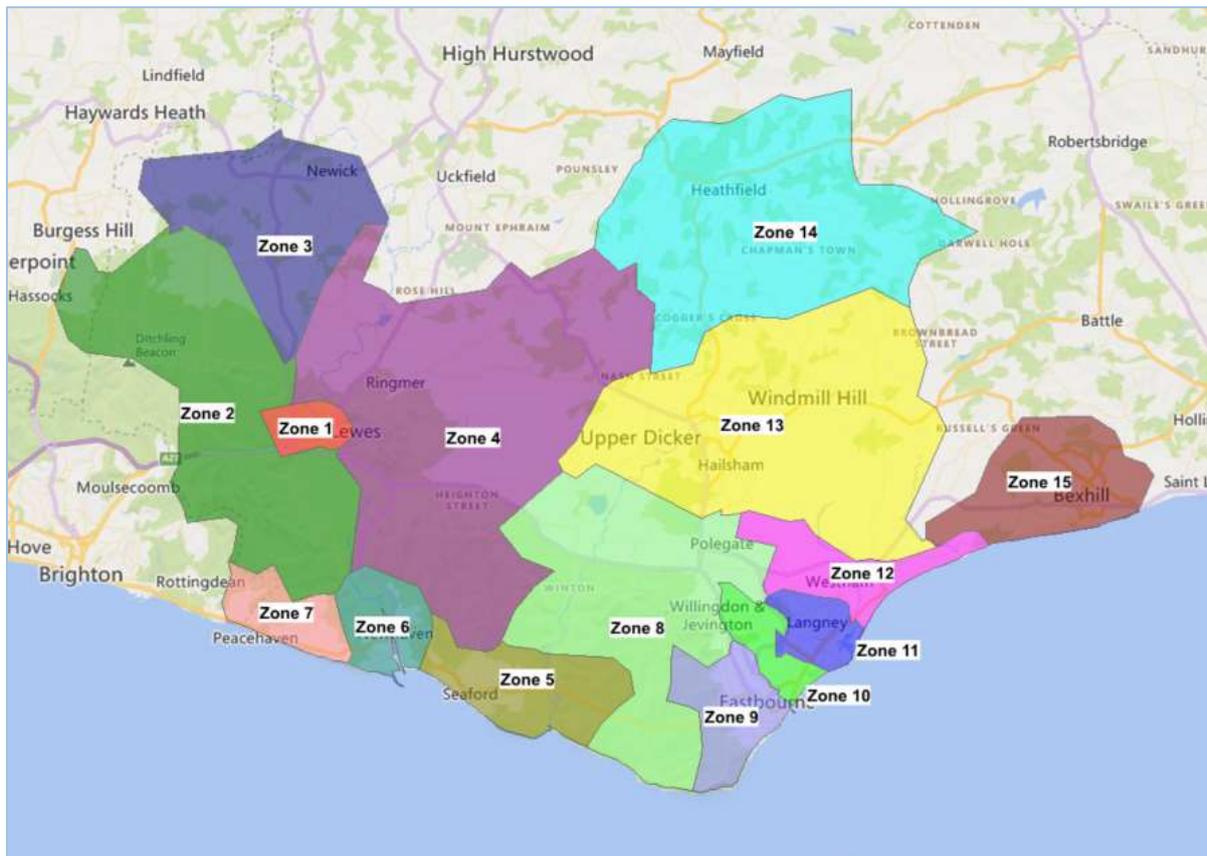
We detail below the scope and format of the quantitative retail needs assessment. Further details on the Excel-based retail capacity model are provided at Appendix v.

Catchment Area

For this Study (and the [Eastbourne Borough Retail and Leisure Study 2022] being prepared in parallel) we have defined a realistic and sufficiently wide catchment area from where the main centres and other shopping destinations 'capture' a substantial proportion of their turnover.

The catchment area has been separated into 15 zones, as shown in Figure 32 below. A larger map is included at Appendix i.

Figure 32 – Map of the catchment area



The catchment area zones are based on postcode geography and extend beyond the administrative boundaries of Lewes District and Eastbourne Borough to reflect shopping patterns and expenditure flows. Our starting point for defining this catchment area was the Lewes District Shopping and Town Centres Study 2012 and the Eastbourne Borough Shopping Assessment 2010. The catchment areas used in those studies overlapped and we consolidated some zones (where appropriate) to define a total of 15 zones for this Study, for example by merging two zones into one where shopping patterns are similar based on the previous survey research. This is a suitable approach for strategic retail capacity forecasting and ensures a comprehensive picture of shopping patterns and expenditure flows across a very wide area.

The catchment area sets the sampling framework for the new household telephone survey, which provides a baseline picture of the market shares and turnovers of the shopping destinations modelled at 2022. More information on the household telephone survey is included in the Baseline Evidence (Household Telephone Survey of Shopping Patterns) section on pp. 48.

Shopping Destinations and Scenarios Modelled

The shopping destinations we have modelled, as agreed with the Council, are identified in Figure 33 below.

Figure 33 – Shopping destinations modelled in Lewes District and Lewes Town

Area	Shopping destinations modelled
Lewes District (outside SDNP)	Seaford Town Centre Peacehaven (Meridian Centre) District Retail Centre Newhaven (Town Centre) District Retail Centre Peacehaven (South Coast Road/Telscombe Cliffs) Local Centre Ringmer Local Centre Newick Local Centre Non-central stores in Lewes District (as a group)
Lewes Town (within SDNP)	Lewes Town Centre (SDNP) Non-central stores in Lewes Town (SDNP) (as a group)

We assess the ‘baseline’ scenario for new retail floorspace, in which we assume that the 2022 pattern of market shares of convenience and comparison goods expenditure in each of the Lewes District / Lewes Town shopping destinations – as indicated by the new household telephone survey – remains unchanged throughout the forecasting period. The implicit assumption in this scenario is that any new retail floorspace (or ‘lost’ retail floorspace e.g. through redevelopment and/or change of use to non-retail), either within or outside the District, would not change the market shares of expenditure attracted from the catchment area. This ‘constant market share’ approach is widely used and accepted for strategic retail capacity forecasting.

Whilst we originally set out to prepare capacity forecasts for both convenience and comparison goods floorspace in each of the shopping destinations modelled, we have prepared forecasts for comparison goods floorspace only in Newhaven (Town Centre) District Retail Centre. This is because no survey respondents indicated that they do ‘most of’ their main food and/or top-up food shopping in Newhaven Town Centre. Although this is probably unrealistic, the lack of market share data means it is not possible to forecast capacity.

Furthermore, we have prepared forecasts for convenience goods floorspace only in Ringmer and Newick Local Centres. This is because these centres are not ‘main’ destinations for comparison goods expenditure and thus do not feature notably in the results of the household telephone survey. As such, there is a lack of reliable data on the market shares of comparison goods expenditure which they attract.

The absence of these particular capacity forecasts is, in our view, of little consequence for the emerging Local Plan. In practice, there will be very little retailer demand for new convenience and/or comparison goods floorspace in the District’s smaller centres. It is therefore very unlikely that substantial new retail development will need to be planned for. Should proposals come forward for an appropriate scale and nature of retail development within the centres, they should be supported by LDC (at least from the perspective of ensuring town centre vitality).

We have undertaken two scenario assessments for the purpose of this Study. These have been agreed with the Council and are as follows:

- Scenario A – retail needs for Lewes District as a whole including Lewes Town (SDNP); and
- Scenario B – retail needs disaggregated between Lewes Town (SDNP) and the rest of Lewes District.

We present our retail capacity forecasts on this basis in section 6 of this report.

Base and Forecasting Years

We have used 2022 as the base year for our retail capacity forecasts. The model therefore provides estimates of current sales in each of the Lewes District / Lewes Town shopping destinations as at 2022.

As agreed with the Council, we have prepared capacity forecasts at 2025, 2030, 2035 and 2040 (so as to cover the forthcoming plan period).

Limitations of Retail Capacity Forecasting

It is important to note that the retail capacity forecasts serve only as a guide for future planning policies, development strategies and/or decisions on planning applications. They are not prescriptive and the further ahead the forecasting year, the less certain the forecasts. Accordingly, the Council should be aware that capacity forecasts beyond five years should be treated with a degree of caution, as they are based on various assumptions and forecasts that can and will change. Forecasting accuracy, even over the next five years, is further uncertain due to challenging macro-economic conditions.

We would also note that some of the District's existing centres are relatively small and are not main destinations for shopping, and thus do not feature notably in the results of the household telephone survey. As such, whilst we have sought to prepare retail capacity forecasts for the smaller centres, the inevitable lack of 'full' market share data is a limitation.

Format of the Retail Capacity Tables

In the remainder of this section, all references to Tables are those comprising our up-to-date assessment of new retail floorspace capacity set out at Appendix ii:

- Tables 1 to 5 show the population and expenditure forecasts for the catchment area;
- Tables 6 to 13 are the tables for Seaford Town Centre. Tables 6 and 7 indicate the pattern of market shares of expenditure on each category of convenience and comparison goods respectively attracted from the catchment area, as indicated by the 2022 household telephone survey.
- Table 8 provides an overview of the pattern of market shares for Seaford Town Centre.
- Table 9 is the product of Tables 5 and 7, indicating the amounts of expenditure on each comparison goods sub-category attracted.
- Table 10 sets out forecast retail sales for both convenience and comparison goods, on a zone-by-zone basis and overall.
- Table 11 accounts for the sales capacity of existing main foodstores and other convenience goods shops in the Town Centre.
- Table 12 sets out any committed retail developments and their expected sales levels (for both convenience and comparison goods).
- Table 13 brings together the expenditure attracted, existing floorspace and commitments to arrive at the retail capacity forecasts for Seaford Town Centre. It also shows the overall market shares of catchment area expenditure on convenience and comparison goods attracted by the Town Centre.
- Tables 14 to 21 are the tables for Peacehaven (Meridian Centre) District Retail Centre. These tables follow the same arrangement as the tables for Seaford Town Centre. Thereafter, Tables 22 to 29 relate to Newhaven (Town Centre) District Retail Centre; Tables 30 to 37 for Peacehaven (South Coast Road/Telscombe Cliffs) Local Centre; Tables 38 to 43 for Ringmer Local Centre; and Tables 44 to 49 for Newick Local Centre.
- Tables 50 to 58 relate to Non-central stores in Lewes District. These tables follow the same arrangement as the tables for the main centres; however, an additional table is included (Table 56) indicating 'benchmark' comparison goods sales in the existing retail warehouses and foodstores.
- Tables 59 to 66 are the tables for Lewes Town Centre (SDNP), which follow the same arrangement as the tables for Seaford Town Centre described above.
- Tables 67 to 75 relate to Non-central stores in Lewes Town (SDNP). These tables follow the same arrangement as the tables for Non-central stores in Lewes District.

Baseline Evidence

Household Telephone Survey of Shopping Patterns

As set out above, we designed and commissioned a new household telephone survey of shopping patterns in the catchment area – the results of which are included at Appendix iii. It covered the area shown on the map at Appendix i which was divided into the 15 catchment zones identified.

A total of 1,500 telephone interviews were conducted by NEMS in March/April 2022. These interviews were distributed across the 15 catchment zones (with 100 interviews undertaken in each zone).

The survey asked questions about households' shopping habits for main food and top-up food (i.e. convenience goods) shopping. The survey also asked questions about households' shopping habits for 8 different sub-categories of comparison goods shopping (these sub-categories are closely matched with the widely recognised retail expenditure categories to ensure compatibility with the retail capacity model). We combined the results of Questions 15 to 22 of the household telephone survey to provide weighted average market shares of all comparison goods expenditure attracted to each of the Lewes District / Lewes Town shopping destinations, using weights according to the amount of expenditure on each of these 8 sub-categories of comparison goods shopping. These are set out in Table 4 (bottom row) of the model at Appendix ii.

Market Share Adjustments

The household telephone survey provides a detailed picture of where households in each of the 15 catchment zones do 'most of' their shopping for convenience goods and the 8 different categories of comparison goods. This is common practice for a survey of this nature, since it is not practical within the limitations of the sample to accurately quantify how much households spend on convenience goods and the various categories of comparison goods, and where and how often. Shopping patterns are too dynamic and unpredictable. Therefore, the results of the household telephone survey do not directly indicate actual expenditure flows but are the best available data to use as a proxy for modelling retail expenditure flows from residential areas to shopping destinations.

However, like all such surveys, this means that its results cannot be applied uncritically in the model. Thus for example, such surveys (undertaken by us and other consultants) often tend to over-emphasise shopping in larger centres and stores, and under-represent it in small centres. The main reason is because in a small sample survey, the probability of interviewing the small number of people who use small centres is much less than the probability of interviewing the much larger number of people who use larger centres.

It is also sometimes the case, in our experience, that convenience goods shopping is under-represented in those larger centres which are principally comparison goods shopping destinations.

It can therefore be necessary to make market share adjustments, or 'correction' factors, so as to transfer expenditure in the model from one or more locations to others, to balance (or calibrate) the model and make it represent reality more accurately based on our professional judgements. This is not uncommon and has been necessary in the case of this Study.

There is an approximate correlation between the size of a centre and its average sales density, with larger centres generally having higher sales densities than smaller centres (and hence higher shop rental values). Coupled with our knowledge of the content and quality of the retail offer in the shopping destinations modelled, this has been used as the guiding principle for determining whether any market share adjustments are necessary.

For instance, Seaford Town Centre is a centre where we would probably expect the survey results to under-estimate comparison goods sales, due to its scale and somewhat limited comparison goods retail offer (e.g. there are no fashion multiples). In fact the use of the survey-indicated comparison goods market shares would result in a very unrealistically low sales density (of just £2,900 per sqm net in 2022) and we have therefore increased the market shares by the correction factor of 130% (i.e. we have increased them by 30% from the no-change default factor of 100%). This results in a more realistic average sales density of about £4,000 per sqm net in 2022.

With regards to the survey-indicated convenience goods market shares, we consider using the market shares from the household telephone survey without correction would generate (for example) an unrealistically high sales density for the Non-central stores in Lewes District. Although we assess the main foodstores (in particular Sainsbury's and Lidl outside Newhaven Town Centre) are trading well and potentially above company benchmark levels, it is unlikely that the 'non-central' convenience goods shops and stores (combined) are achieving the level of sales indicated by the survey research. We have therefore reduced the survey-indicated convenience goods market shares for every catchment zone by the market share correction factor of 80% (i.e. we have reduced them by 20% from the no-change default factor of 100%). This is considered to reflect a more realistic 'over trading' position, with an average sales density of about £12,600 per sqm net in 2022, compared to almost £16,000 per sqm net without adjustment.

The market share adjustments we have made are indicated in the header of Table 8 for Seaford Town Centre; in the header of Table 52 for Non-central stores in Lewes District; and in the header of the equivalent tables for the other shopping destinations modelled.

Catchment Population

The starting point for the population forecasts is a report⁷ on the current and projected future population of each catchment zone. The result is that, for the catchment area as a whole, the population is expected to increase from 355,545 in 2022 to 400,272 by 2040 (representing an increase of about 12.5%).

Per Capita Expenditure

The report commissioned from Precisely sets out estimated average per capita expenditure on convenience and comparison goods in each catchment zone. The estimates and forecasts included within the report take account of differences in average per capita expenditure on comparison and convenience goods from zone to zone; and are therefore expected to be more reliable than relying on national forecasts.

We have applied these estimates and forecasts of per capita expenditure on both comparison and convenience goods, including expenditure on Special Forms of Trading (SFT), within the top half of Table 2 at Appendix ii.

Although the household telephone survey included a question asking respondents how much, on average, their household spends on main food (Q04) and top-up food (Q06) shopping in a week⁸, the data contained in the Precisely report – and used within the model – is more representative of the catchment area population as a whole.

Special Forms of Trading

We have made deductions from the per capita expenditure figures supplied by Precisely to allow for expenditure via SFT. This includes online shopping, mail order and expenditure at temporary market stalls; and is therefore expenditure not made in shops and stores. Table 2 shows the growing deductions we have made.

We have applied an SFT deduction of 7% for convenience goods expenditure in 2022, increasing to 8.5% by 2040. Our SFT deductions for comparison goods expenditure are much greater; from 22.5% in 2022 to 30% by the end of the forecasting period.

These deductions are based on our professional judgements at this moment in time. Whilst the total volume of online retail sales is greater than the percentages assumed within the model, it is necessary to recognise that, with the growth of multi-channel retailing, physical stores can function as showrooms and a source of stock for online-based sales. Therefore, not all online retail sales are 'lost' from the turnover of physical stores and our SFT deductions seek to account for this.

⁷ Geolinsight Report produced by Precisely (formerly Pitney Bowes), March 2022.

⁸ The survey did not include a similar question in relation to comparison goods shopping.

Total Available Expenditure in the Catchment Area

The combined effect of the forecast growth in population and per capita expenditure (after deducting expenditure on SFT) is that we expect total catchment area expenditure on convenience goods to increase by about £30.8m (approximately 4%) over the period 2022 to 2040; as set out in Table 3 of the model.

For comparison goods, we expect total catchment area expenditure to increase by about £431m (approximately 33%) over the period 2022 to 2040. This compares with growth in the total catchment area population of around 12.5% over the period. Thus, only a relatively small proportion of the growth in catchment area expenditure on comparison goods is accounted for by forecast growth in population. This means that the comparison goods floorspace capacity forecasts are particularly insensitive to population growth assumptions, principally because:

- Any population growth is likely to be only a small proportion of total catchment area population (and its available expenditure); and
- The expenditure arising from any population growth is likely to be attracted by a number of shopping destinations (as shopping patterns vary greatly), therefore having only a small effect on capacity forecasts in any individual centre.

The comparison goods floorspace capacity forecasts are much more sensitive to the assumptions about growth in per capita expenditure, however, especially in the later part of the forecasting period. This underlines the need to review the capacity forecasts at regular intervals over that period.

Visitor Expenditure

The results of the household telephone survey indicate expenditure flows of residents who live within the 15 catchment area zones and, for some of the shopping destinations modelled, we have made allowances for comparison goods expenditure by visitors who live outside this catchment area. Our assumptions are based on professional judgement, informed by our knowledge of the centres including their propensity to attract tourists.

We have assumed that the largest centres (namely Seaford and Lewes Town Centres) will attract 2% and 5% respectively: this means we expect that expenditure on comparison goods in Seaford Town Centre by visitors who live outside the catchment area amounts to 2% of expenditure by catchment area residents, and so on.

We have also allowed for convenience goods expenditure 'inflows' of 2% to both Seaford and Lewes Town Centres given their tourism functions.

We have made no such allowances for the other shopping destinations modelled, given that they are unlikely to secure substantial expenditure from outside the wide catchment area.

Existing Shop Floorspace

The existing shop floorspace in the Lewes District / Lewes Town shopping destinations is sourced from the most recent Experian Goad surveys. However, with regards to Ringmer and Newick Local Centres and some of the Non-central stores in Lewes District / Lewes Town, floorspace data has been derived from Edozo Maps and/or relevant planning permissions.

Non-central stores in Lewes District are principally concentrated in Newhaven, at The Drove Retail Park (e.g. B&Q, Carpetright, Pets at Home) or nearby (e.g. Lidl, Sainsbury's, The Range). Brooks Road is the dominant 'non-central' retail area in Lewes Town and includes the edge-of-centre Aldi, Tesco and Homebase.

Committed Shop Floorspace

We have included in the model any substantial retail floorspace expected to come forward, or be released for non-retail uses, in the shopping destinations modelled.

Such commitments are limited to Lewes Town (SDNP) where the existing edge-of-centre Aldi foodstore at Brooks Road is subject to extant planning permission (ref. SDNP/18/05206/1) for a replacement, larger Aldi foodstore. The net additional convenience goods floorspace, and resulting estimated sales, is accounted for in Table 74 at Appendix ii.

Growth in Sales Densities

We have assumed that both existing and new comparison goods floorspace will increase its sales density (i.e. £ turnover per sqm net) by approximately 2% per annum throughout the forecasting period. This allocates a proportion of the forecast growth in expenditure to existing shops and stores, to allow them to become more efficient from 2022 onwards⁹, before new floorspace becomes necessary. Our judgements in this respect take into consideration Precisely's Retail Expenditure Guide 2021/22 and Experian's Retail Planner Briefing Note.

We have made no allowance for increases in sales densities of convenience goods floorspace over the forecasting period. This is because such floorspace is less likely to be affected by changing efficiency.

⁹ Such trading efficiencies are more likely to be achieved within the larger and/or modern shops and stores (as opposed to smaller, less flexible formats).

6. RETAIL NEEDS: FORECASTS

Introduction

In this section, we set out and discuss the implications of the retail capacity forecasts for Lewes District – including and excluding the forecasts for Lewes Town (SDNP) – over the period to 2040. In setting out our forecasts, we distinguish between convenience goods and comparison goods, defined as follows:

- **Convenience goods:** Food, alcoholic drink, tobacco products, newspapers and periodicals, non-durable household goods.
- **Comparison goods:** Clothing and footwear; household textiles and soft furnishings; Furniture and floor coverings; household appliances; audio visual equipment; hardware, DIY goods, decorating supplies; chemist and medical goods, cosmetics and beauty products; books, jewellery, watches, china, glassware and kitchen utensils, recreational, personal and luxury goods.

As outlined in section 5, our forecasts represent the ‘baseline’ scenario for new retail floorspace, in which we assume that the 2022 pattern of market shares of convenience and comparison goods expenditure (as indicated by the new household telephone survey) remains unchanged throughout the forecasting period – notwithstanding the potential impact of any new or replacement retail development and/or any existing shop floorspace ‘lost’ to alternative uses.

Convenience Goods Floorspace

Before we comment on the capacity for convenience goods floorspace, we would note that the forecasts are on the assumption that, where existing foodstores and other convenience goods floorspace is shown in the model to be trading above average benchmark levels, the sales density will fall to that benchmark level from 2025 onwards. In reality, however, some stores may continue to trade above (or below) average benchmark levels.

The forecasts are also on the assumption that potential new convenience goods floorspace would be delivered in the form of a new foodstore(s) trading at a ‘generic’ average sales density of £11,500 per sqm net. Some operators would trade above this level whilst other foodstores (and convenience goods shops) would trade below. Therefore, the format in which new convenience goods floorspace is provided will affect the amount of such floorspace that can be supported in terms of expenditure-based capacity.

Our forecasts in respect of the need for new convenience goods floorspace in Lewes District are summarised in Figure 34a below. These are the Scenario A forecasts for the District as a whole including Lewes Town (SDNP). Figure 34b then sets out the Scenario B capacity forecasts disaggregated between Lewes Town and the rest of Lewes District.

Figure 34a – Scenario A capacity forecasts: convenience goods (sqm net sales area)

	2025	2030	2035	2040	Table number (Appendix ii)
Seaford Town Centre	550	650	700	750	13
Peacehaven (Meridian Centre)	-850	-800	-800	-800	21
Newhaven (Town Centre)	n/a	n/a	n/a	n/a	29
Peacehaven Local Centre	-300	-250	-250	-200	37
Ringmer Local Centre	-100	-100	-100	-100	43
Newick Local Centre	-100	-100	-100	-100	49
Non-central stores in Lewes District	1,200	1,400	1,450	1,500	58
Lewes Town Centre (SDNP)	-100	-50	-	-	66
Non-central stores in Lewes Town (SDNP)	500	600	650	700	75
Combined forecasts for Lewes District / Lewes Town	800	1,350	1,550	1,750	

Notes:

a) The forecasts are cumulative i.e. the forecasts for each year include the forecasts for the previous years and are not additional to those earlier forecasts.

b) Forecasts rounded to the nearest 50 sqm net.

Figure 34a shows there will be capacity for convenience goods floorspace in Seaford Town Centre of around 550 sqm net sales area in 2025, rising to about 750 sqm net sales area by the end of the plan period. Each of the other existing centres are forecast to have a limited theoretical over-supply of convenience goods floorspace from 2025 onwards. This is because, on the basis existing foodstores and other convenience goods floorspace will trade at benchmark levels over the forecasting period, there will be insufficient total convenience goods expenditure available to support existing provision.

Non-central stores in Lewes District and Lewes Town (SDNP) respectively have the potential to support additional convenience goods floorspace. However, this does not mean that such capacity forecasted should necessarily be accommodated in the form of ‘non-central’ development. Rather, the sequential approach of the NPPF should be applied.

The overall (i.e. combined) forecasts identified above are the sum of our individual forecasts for the shopping destinations modelled, rising from about 800 sqm net sales area in 2025 to about 1,750 sqm net sales area by the end of the plan period.

Figure 34b below disaggregates the convenience goods capacity between Lewes Town and the rest of Lewes District.

Figure 34b – Scenario B capacity forecasts: convenience goods (sqm net sales area)

	2025	2030	2035	2040	Table number (Appendix ii)
Seaford Town Centre	550	650	700	750	13
Peacehaven (Meridian Centre)	-850	-800	-800	-800	21
Newhaven (Town Centre)	n/a	n/a	n/a	n/a	29
Peacehaven Local Centre	-300	-250	-250	-200	37
Ringmer Local Centre	-100	-100	-100	-100	43
Newick Local Centre	-100	-100	-100	-100	49
Non-central stores in Lewes District	1,200	1,400	1,450	1,500	58
Aggregate forecasts for Lewes District (outside SDNP) only	400	800	900	1,050	
Lewes Town Centre (SDNP)	-100	-50	-	-	66
Non-central stores in Lewes Town (SDNP)	500	600	650	700	75
Aggregate forecasts for Lewes Town (within SDNP) only	400	550	650	700	

Notes:

a) The forecasts are cumulative i.e. the forecasts for each year include the forecasts for the previous years and are not additional to those earlier forecasts.

b) Forecasts rounded to the nearest 50 sqm net.

Figure 34b indicates that Lewes District and Lewes Town will each have capacity for convenience goods floorspace of around 400 sqm net sales area in 2025 (based on the sum of our individual forecasts for the shopping destinations modelled in Lewes District and Lewes Town respectively). In the longer term, when forecasting should be treated with a degree of caution, forecast capacity rises to about 1,050 sqm net sales area in Lewes District and about 700 sqm net sales area in Lewes Town.

This amount of convenience goods floorspace ‘need’, disaggregated between Lewes Town and the rest of the District, is unlikely to be sufficient to support new foodstore development¹⁰. Such expenditure-based capacity does, however, have the potential to be met organically through changes of use and/or repurposing; or support the improvement and/or replacement of existing foodstore provision.

Comparison Goods Floorspace

Our capacity forecasts for comparison goods floorspace in Lewes District are summarised in Figure 35a. These are the Scenario A forecasts for the District as a whole including Lewes Town (SDNP) and assume that any new comparison goods

¹⁰ Aldi and Lidl, which continue to pursue store expansion programmes and are probably the most likely operators from a demand perspective, typically seek a convenience goods net sales area in excess of about 1,000 sqm. In practice, should new proposals come forward, they have the potential to be supported in expenditure terms by attracting market share from existing convenience goods floorspace.

floorspace would trade at a 'generic' average sales density of £5,000 per sqm net (grown from 2022 in line with forecast growth in expenditure). Figure 35b then sets out the Scenario B capacity forecasts on the same basis but disaggregated between Lewes Town and the rest of Lewes District.

Figure 35a – Scenario A capacity forecasts: comparison goods (sqm net sales area)

	2025	2030	2035	2040	Table number (Appendix ii)
Seaford Town Centre	-100	-200	-300	-400	13
Peacehaven (Meridian Centre)	-	-50	-50	-50	21
Newhaven (Town Centre)	-	-50	-50	-100	29
Peacehaven Local Centre	-	-	-50	-100	37
Ringmer Local Centre	n/a	n/a	n/a	n/a	43
Newick Local Centre	n/a	n/a	n/a	n/a	49
Non-central stores in Lewes District	-1,000	-1,050	-1,150	-1,250	58
Lewes Town Centre (SDNP)	-200	-350	-500	-700	66
Non-central stores in Lewes Town (SDNP)	-500	-550	-600	-650	75
Combined forecasts for Lewes District / Lewes Town	-1,800	-2,250	-2,700	-3,250	

Notes:

a) The forecasts are cumulative i.e. the forecasts for each year include the forecasts for the previous years and are not additional to those earlier forecasts.

b) Forecasts rounded to the nearest 50 sqm net.

Figure 35a shows that, after allowing for existing comparison goods floorspace to become more efficient by 2% per annum, there will be a theoretical over-supply of such floorspace across Lewes District / Lewes Town from 2025 onwards. It should be noted that this substantial over-supply is additional to the quantum of vacant shop floorspace in the existing centres identified in section 4 of this report.

Forecast over-supply is not uncommon for town centres in the face of slower growth in per capita comparison goods expenditure and the increasing volume of retail sales attributed to the internet, which is contributing towards reduced floorspace demand as retailers 'right-size' their store portfolios (as considered previously in section 3 of this report).

Figure 35b below disaggregates the 'negative' comparison goods capacity between Lewes Town and the rest of Lewes District.

Figure 35b – Scenario B capacity forecasts: comparison goods (sqm net sales area)

	2025	2030	2035	2040	Table number (Appendix ii)
Seaford Town Centre	-100	-200	-300	-400	13
Peacehaven (Meridian Centre)	-	-50	-50	-50	21
Newhaven (Town Centre)	-	-50	-50	-100	29
Peacehaven Local Centre	-	-	-50	-100	37
Ringmer Local Centre	n/a	n/a	n/a	n/a	43
Newick Local Centre	n/a	n/a	n/a	n/a	49
Non-central stores in Lewes District	-1,000	-1,050	-1,150	-1,250	58
Aggregate forecasts for Lewes District (outside SDNP) only	-1,100	-1,350	-1,600	-1,900	
Lewes Town Centre (SDNP)	-200	-350	-500	-700	66
Non-central stores in Lewes Town (SDNP)	-500	-550	-600	-650	75
Aggregate forecasts for Lewes Town (within SDNP) only	-700	-900	-1,100	-1,350	

Notes:

a) The forecasts are cumulative i.e. the forecasts for each year include the forecasts for the previous years and are not additional to those earlier forecasts.

b) Forecasts rounded to the nearest 50 sqm net.

The capacity forecasts indicate that comparison goods floorspace ‘over-supply’ is slightly greater in Lewes District compared to Lewes Town, which can largely be attributed to our individual forecasts for the Non-central stores in Lewes District (i.e. about -1,000 sqm net sales area in 2025).

A review of potential development sites is beyond the scope of this Study; however, there are good opportunities in some of the District’s centres for rationalising and/or repurposing comparison goods floorspace, which may be either vacant or under-utilised. To that end, the findings in respect of comparison goods floorspace ‘needs’ point to the appropriateness of a more flexible policy response (for example, when controlling the proportion of retail uses within a centre and/or shopping frontage) as we consider in section 9 of this report.

7. COMMERCIAL LEISURE NEEDS ASSESSMENT

Introduction

Leisure uses and activities are an important part of successful town centres and can play a major role in attracting visitors, extending dwell times, and supporting the evening economy. Most leisure uses are therefore defined as main town centre uses in NPPF terms (although not all are included within Class E of the Use Classes Order, with the some being classified as 'sui generis' uses).

In this section, we identify the current supply of key leisure facilities in Lewes District / Lewes Town (by type and location) and assess whether there are any deficiencies or 'gaps' in the existing commercial leisure offer – with a particular focus on:

- i. eating and drinking out (i.e. food and beverage uses) comprising;
 - a. food and drink for consumption (mostly) on the premises – Class E(b)
 - b. public houses, wine bars or drinking establishments – sui generis
 - c. drinking establishments with expanded food provision – sui generis
 - d. hot food takeaways – sui generis
- ii. cinemas – sui generis;
- iii. bingo / casino facilities – sui generis;
- iv. ten-pin bowling – Class E(d);
- v. trampoline parks – Class E(d); and
- vi. gyms and health & fitness facilities – Class E(d).

The analysis follows our review of the leisure market context and trends at section 3 of this report in addition to our healthcheck assessments of the District's centres at section 4.

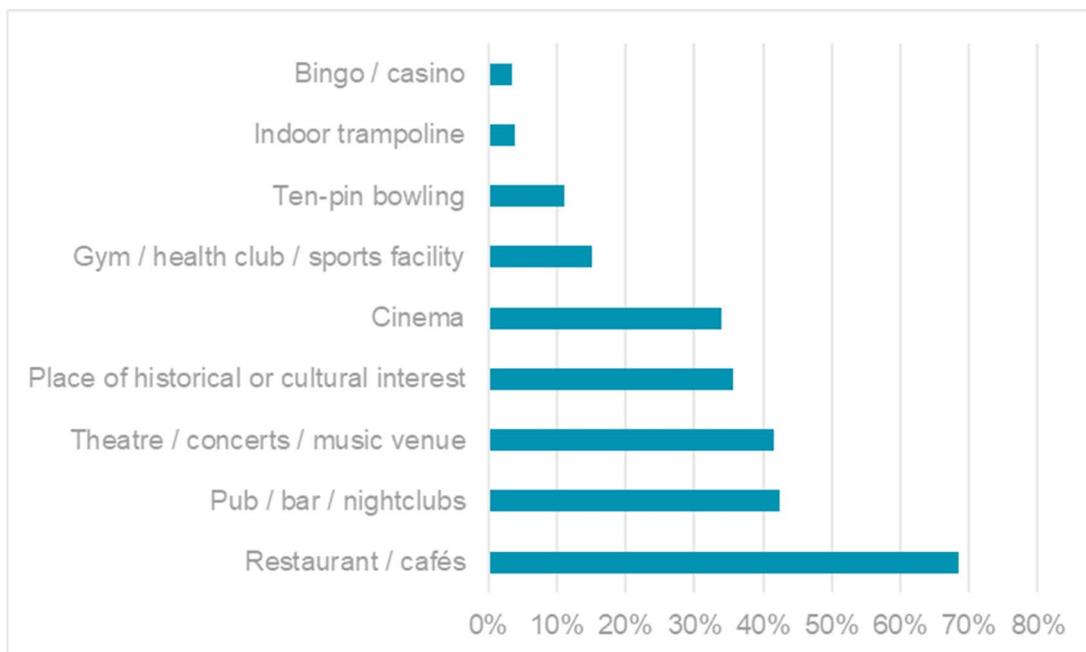
It should be noted that forecasting the need for commercial leisure provision is more problematic than for retailing. This is due to the unpredictable and highly elastic nature of leisure trips (and associated spending) in addition to a lack of reliable performance data. Consequently, there is no robust method for assessing commercial leisure needs in quantitative terms. Our review is therefore based on high level qualitative analysis informed by the following:

- the results of the 2022 household telephone survey;
- Experian Goad surveys; and
- desktop research and our own site inspections during [September and October 2022].

Participation Levels

Figure 36 below shows the level of participation in different types of leisure-based activities by respondents to the household telephone survey which, as described in section 5 of this report, is based on a catchment area comprising 15 zones (as shown on the map included at Appendix i).

Figure 36 – Participation in leisure-based activities across the catchment area



Source: Question 24 of household telephone survey (Appendix iii).

As shown in Figure 36, the most popular activity relates to eating and drinking out, with almost 70% of respondents visiting restaurant/ cafes and over 42% visiting pub/ bar/ nightclubs. The Eating Out and Drinking Out subsection of this report below considers respondents’ frequency of visits to such facilities and the most popular destinations in (and outside) Lewes District.

The ‘theatre / concerts / music venue’ category accounts for the next highest level of participation (almost 42% of respondents), followed by places of historical or cultural interest (about 36%). However, with the exception of Lewes and/or Lewes Town Centre within SDNP, the survey research identified very few attractions of this nature in the District.

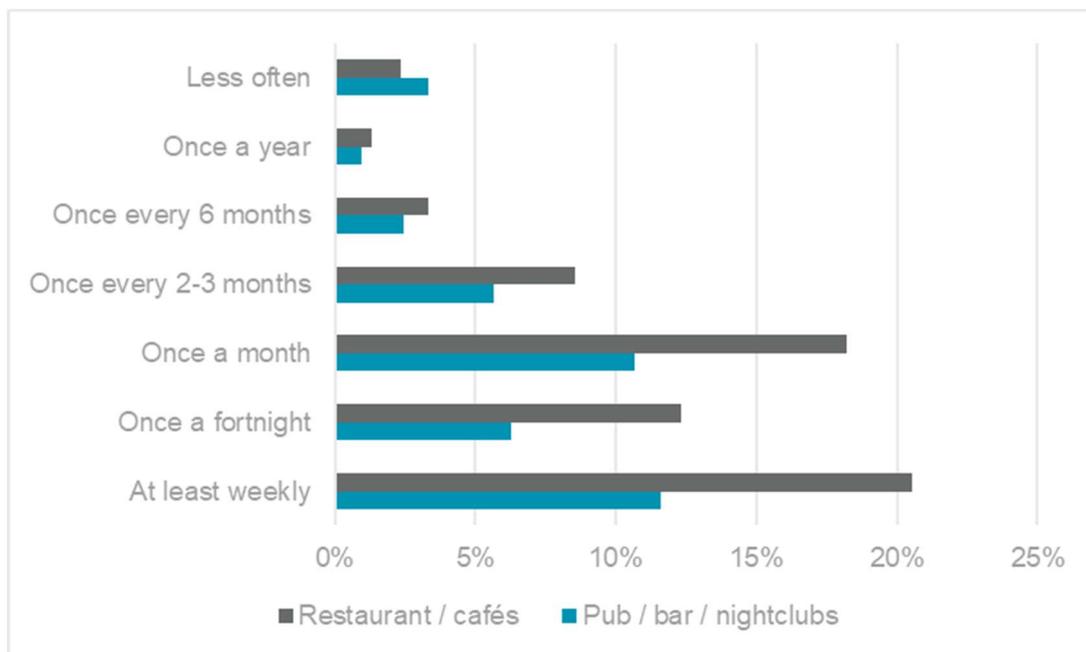
Just over a third of respondents to the household telephone survey visit the cinema. The Cinema subsection on page 64 examines this type of activity in more detail, including the frequency of visits and existing provision in Lewes District / Lewes Town and the surrounding area. Participation in other types of leisure-based activities is much lower, including visits to a gym / health club / sports facility (15%) and ten-pin bowling (11%).

Eating and Drinking Out

A good quality and choice of food and beverage (F&B) uses can help to support a centre’s retail function and complement the wider offer by generating footfall and extending dwell times into the evening.

As identified in Figure 36 above, eating out (i.e. restaurant/ cafes) and, to a lesser extent, drinking out (i.e. pub/ bar/ nightclubs) command the highest participation levels in leisure-based activities across the catchment area. Figure 37 below sets out the frequency of visits.

Figure 37 – Frequency of visits to ‘eating and drinking out’ facilities



Source: Question 24 of household telephone survey (Appendix iii).

More than one in five respondents visit restaurants and cafes at least weekly, while almost a third (in addition) eat out fortnightly or once a month. Drinking out appears to be a less frequent activity although, of those who do visit the pub/ bar/ nightclubs, most suggested that they visit at least weekly.

On the face of it, such trips and spending should support the potential to enhance the scale and choice of F&B uses in Lewes District. However, the level of growth will be subject to market conditions and demand.

To that end, a number of major chains (particularly in the ‘casual dining’ sector e.g. Carluccio’s, Jamie Oliver, Prezzo) downsized pre-pandemic against a backdrop of increased competition and discounting, rising costs, and a tightening of consumer spending in the light of economic uncertainty. Many operators expanded too quickly into increasingly marginal locations and thus the market became saturated and unsustainable.

The pandemic and (more recently) the cost-of-living crisis has resulted in further challenges to the F&B sector, which, after the ‘bounce-back’ in spending on eating and drinking out that followed the relaxing of lockdowns and other restrictions, will need to cater for changing consumer demands to remain relevant and viable. This considers the shift in demand for experience-based activities (such as bars offering an additional entertainment element e.g. darts, bowling or golf) as identified in section 3 and the potential role of ‘pop-up’ restaurants and/or street food traders.

Figure 39 below provides a breakdown of existing F&B outlets in Seaford Town Centre which, as our healthcheck assessment has already identified, is the District’s main centre and includes a good mix of retail and leisure uses. Figure 40 provides the analysis in respect of the District’s smaller centres, and Figure 41 is for Lewes Town Centre.

Figure 39 – Existing Food & Beverage Provision: Seaford Town Centre

	Number of outlets	Percentage of F&B outlets	Percentage of Town Centre outlets	UK average (%)
Cafes & Restaurants	24	54.5%	10.3%	9.6%
Fast Food & Takeaways	10	22.7%	4.3%	5.9%
Drinking Establishments	9	20.5%	3.8%	4.7%
Nightclubs	1	2.3%	0.4%	0.2%
TOTAL	44	100%	18.8%	20.4%

Source: Experian Goad (Accessed September 2022) for Seaford Town Centre.

Notes: 234 outlets (or units) in Seaford Town Centre in total.

Seaford Town Centre has a reasonable F&B offer characterised by independent cafes and restaurants (54.5% of the total number of F&B outlets as Figure 39 shows), takeaways and pubs. The number of existing cafes and restaurants, as a proportion of the total number of units in the Town Centre, is slightly above UK average levels.

Figure 40 – Existing Food & Beverage Provision: other centres in Lewes District

		Number of outlets	Percentage of F&B outlets	Percentage of Town Centre outlets
Peacehaven (Meridian Centre) District Retail Centre	Cafes & Restaurants	1	100%	3.8%
	Fast Food & Takeaways	0	0%	0%
	Drinking Establishments	0	0%	0%
	Nightclubs	0	0%	0%
	TOTAL	1	100%	3.8%
Newhaven (Town Centre) District Retail Centre	Cafes & Restaurants	6	42.9%	6.7%
	Fast Food & Takeaways	5	35.7%	5.6%
	Drinking Establishments	3	21.4%	3.3%
	Nightclubs	0	0%	0%
	TOTAL	14	100%	15.6%
Peacehaven Local Centre	Cafes & Restaurants	4	28.6%	4.5%
	Fast Food & Takeaways	6	42.9%	6.7%
	Drinking Establishments	3	21.4%	3.4%
	Nightclubs	1	7.1%	1.1%
	TOTAL	14	100%	15.7%
Ringmer Local Centre	Cafes & Restaurants	2	40.0%	11.8%
	Fast Food & Takeaways	2	40.0%	11.8%
	Drinking Establishments	1	20.0%	5.9%
	Nightclubs	0	0%	0%
	TOTAL	5	100%	29.4%
Newick Local Centre	Cafes & Restaurants	2	50.0%	18.2%
	Fast Food & Takeaways	0	0%	0%
	Drinking Establishments	2	50.0%	18.2%
	Nightclubs	0	0%	0%
	TOTAL	4	100%	36.4%

Source: Experian Goad for Peacehaven (Meridian Centre) District Retail Centre; Newhaven (Town Centre) District Retail Centre; and for Peacehaven Local Centre (Accessed September 2022). Cushman & Wakefield site visits (September 2022) for Ringmer and Newick Local Centres.

Notes: 26 outlets (or units) in Peacehaven (Meridian Centre) District Retail Centre in total; 90 in Newhaven (Town Centre) District Retail Centre; 89 in Peacehaven Local Centre; 17 in Ringmer Local Centre; and 11 in Newick Local Centre.

Figure 40 above reveals that the F&B offer in the District’s smaller centres is relatively limited. Peacehaven (Meridian Centre) has just one existing outlet – an independent café and takeaway. Newhaven Town Centre and Peacehaven Local Centre both include 14 outlets dedicated to F&B, which account for approximately 16% of the total number of units in each centre. Ringmer and Newick Local Centres contain 5 and 4 outlets respectively.

Figure 41 – Existing Food & Beverage Provision: Lewes Town Centre (SDNP)

	Number of outlets	Percentage of F&B outlets	Percentage of Town Centre outlets	UK average (%)
Cafes & Restaurants	24	57.1%	7.2%	9.6%
Fast Food & Takeaways	8	19.0%	2.4%	5.9%
Drinking Establishments	10	23.8%	3.0%	4.7%
Nightclubs	0	0%	0%	0.2%
TOTAL	42	100%	12.6%	20.4%

Source: Experian Goad (Accessed September 2022) for Lewes Town Centre.

Notes: 333 outlets (or units) in Lewes Town Centre in total.

The analysis for Lewes Town Centre, set out in Figure 41 above, suggests a modest F&B offer considering its size and function as a popular visitor destination. Nonetheless, the centre is well served by branded restaurants (such as Ask, Bill’s, Cote and Pizza Express) in addition to several good quality independent caterers and coffee shops.

Respondents to the household telephone survey were asked where they visit most often for the purpose of eating and drinking out. We summarise below the survey-indicated market shares for pub/ bar/ nightclubs (Figure 42) and restaurant/ cafes (Figure 43) respectively. F&B trips tend to be relatively localised and for this analysis, we focus on the survey research within zones 1-7 (from where centres in Lewes District / Lewes Town attract the highest market shares¹¹) in addition to the catchment area as a whole.

¹¹ The centres do not secure notable market shares from zones 8-12 (broadly covering Eastbourne Borough), zone 13 (Hailsham), zone 14 (Heathfield) or zone 15 (Bexhill-on-Sea).

Figure 42 – Pub/ bar/ nightclubs market share by catchment area zone

Destination	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Total catchment area market share (zones 1-15)
Seaford Town Centre	-	4.7%	-	-	69.0%	9.4%	5.6%	6.7%
Peacehaven (Meridian Centre)	-	-	-	-	-	-	10.3%	0.9%
Newhaven (Town Centre)	-	-	-	-	-	33.4%	6.6%	2.3%
Peacehaven Local Centre	-	-	1.1%	-	-	12.5%	13.5%	1.9%
Ringmer Local Centre	4.7%	-	-	21.0%	-	-	-	1.4%
Newick Local Centre	-	-	22.3%	3.9%	-	-	-	1.6%
Lewes Town Centre (SDNP)	72.9%	8.0%	15.8%	25.4%	-	6.9%	3.2%	7.8%

Source: Question 25 of household telephone survey (Appendix iii).

Figure 42 above shows that Seaford Town Centre is a main destination for drinking out in Lewes District, attracting an overall share of 6.7% including 69% from zone 5 (i.e. the Seaford ‘home’ zone). Where market shares have been identified for the District’s other centres, the findings confirm that those smaller destinations cater for more localised catchments (relative to Seaford Town Centre).

Meanwhile, Lewes Town Centre is the principal destination for drinking out, securing a catchment area market share of 7.8% and particularly high shares from zone 1 (i.e. the Lewes Town ‘home’ zone) and zone 4 (i.e. the rural east).

Whilst not shown in the table above, the main competing destinations for drinking out (as indicated by the household telephone survey in relation to zones 1-7) include Eastbourne Town Centre, Brighton Town Centre, Hassocks and Ditchling.

Figure 43 – Restaurant/ cafes market share by catchment area zone

Destination	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Total catchment area market share (zones 1-15)
Seaford Town Centre	2.2%	2.8%	-	3.4%	56.1%	7.6%	7.8%	6.0%
Peacehaven (Meridian Centre)	-	-	-	-	-	0.9%	10.9%	1.2%
Newhaven (Town Centre)	-	0.8%	-	-	4.1%	18.8%	5.0%	1.7%
Peacehaven Local Centre	-	-	-	-	2.0%	3.0%	17.1%	2.0%
Ringmer Local Centre	3.8%	-	-	5.1%	-	3.0%	-	0.5%
Newick Local Centre	-	-	18.3%	-	-	-	-	0.8%
Lewes Town Centre (SDNP)	70.2%	11.8%	15.7%	55.8%	1.0%	14.6%	6.8%	8.9%

Source: Question 26 of household telephone survey (Appendix iii).

Figure 43 above indicates that Seaford Town Centre’s restaurants and cafes largely cater for the immediate catchment (i.e. zone 5) with only limited penetration across the wider area. The lack of catering options in the District’s other centres is reflected in the market shares.

Lewes Town Centre attracts an 8.9% catchment area market share in respect of restaurant/ cafes, slightly higher than the 'drinking out' market share of 7.8% observed previously. This is not surprising given the Town Centre's good quality line-up of branded and independent caterers. Once again, its survey-indicated market shares are highest in zones 1 and 4.

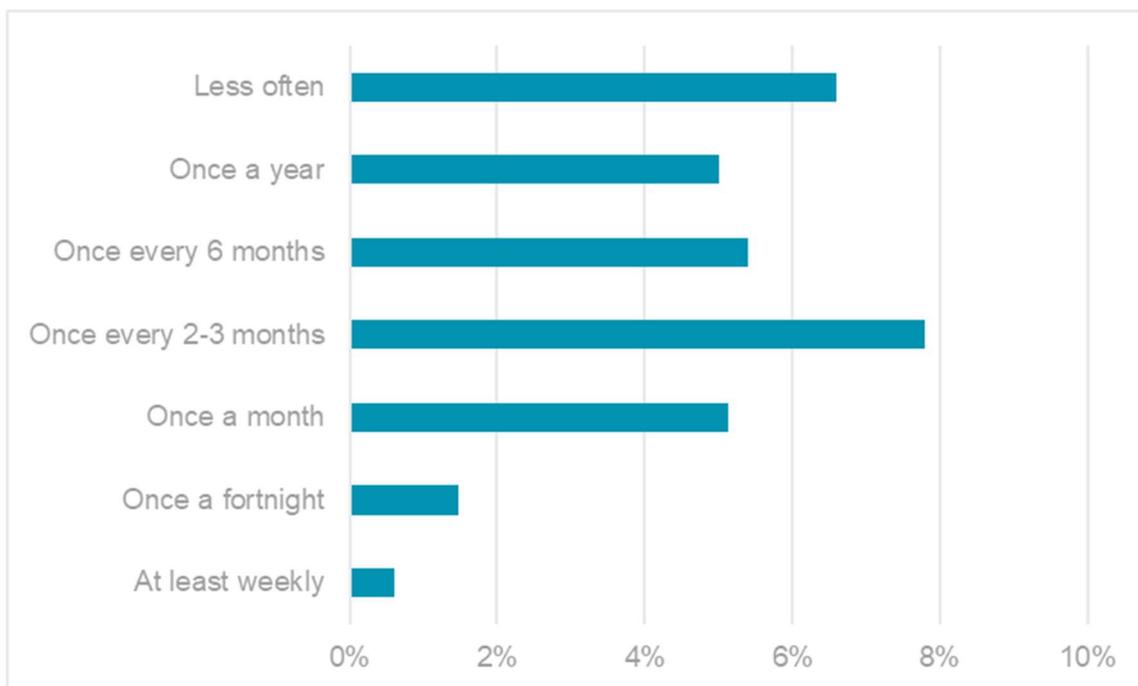
The survey research suggests that the main competing destinations for eating out include Eastbourne Town Centre, Brighton Town Centre, Burgess Hill Town Centre and Haywards Heath.

Cinema

As set out in section 3 of this report, the cinema sector was heavily affected by the pandemic-induced closures and social distancing measures, which led to some large cinema operators facing financial hardship.

Figure 44 below reveals how often respondents to the household telephone survey visit the cinema. It confirms that most cinema users visit once every 2-3 months (about 8%). Just over 7% visit at least once a month; however, 17% visit no more than once every 6 months on average. Bearing in mind that 66% of respondents 'never' visit the cinema, these findings suggest relatively low levels of participation across the catchment area.

Figure 44 – Frequency of visits to: Cinema



Source: Question 24 of household telephone survey (Appendix iii).

Lewes District's only provision is the Depot 3-screen cinema on the edge of Lewes Town Centre (SDNP) which, as shown in Figure 45 below, is popular amongst residents of zones 1-7. Other cinema provision in the surrounding area includes the 8-screen Cineworld in Eastbourne Town Centre as well as the Cineworld at Brighton Marina (to the west) and the Picture House Cinema in Uckfield (to the north).

Figure 45 – Cinema provision and market share by catchment area zone

Destination	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Total catchment area market share (zones 1-15)
Depot, Pinwell Road, Lewes Town (edge-of-centre)	78.2%	45.0%	15.7%	37.6%	38.8%	17.9%	2.5%	17.4%
Cineworld, The Beacon, Eastbourne	9.2%	-	-	11.8%	33.7%	5.3%	2.5%	39.7%
Cineworld, Marina Square, Brighton Marina	9.6%	21.9%	10.6%	-	21.0%	58.6%	72.4%	14.7%
Picture House Cinema, Uckfield	-	-	48.1%	45.8%	-	-	-	8.7%
(Don't know / varies)	3.0%	4.1%	-	4.9%	-	6.2%	8.1%	3.4%

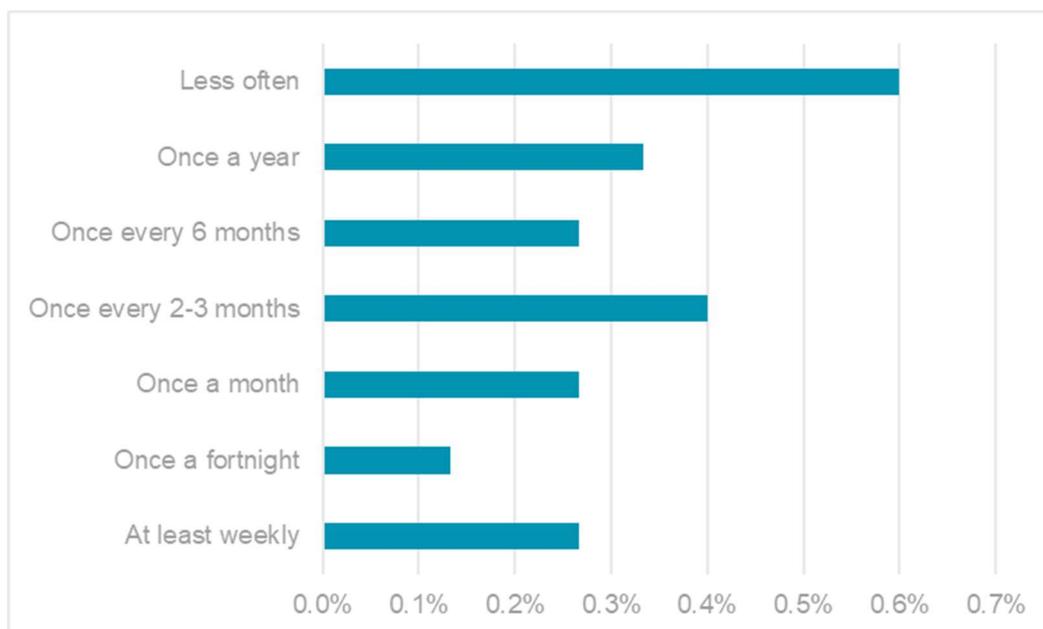
Source: Question 27 of household telephone survey (Appendix iii).

Bingo / Casino

The gaming and gambling sector has been faced with falling admissions and therefore closures in the past ten years or so, driven by the indoor smoking ban and a shift to online-based platforms. To that end, almost 97% of respondents to the household telephone survey indicated that they ‘never’ visit bingo/ casino facilities.

Figure 46 below shows catchment area respondents’ frequency of visits to the bingo/ casino. Illustrating low participation in these types of leisure-based activities, only around 0.7% of respondents indicated that they visit such facilities once a month or more

Figure 46 – Frequency of visits to: Bingo / casino



Source: Question 24 of household telephone survey (Appendix iii).

There is no mainstream bingo/ casino provision in Lewes District, although the survey research identifies market share secured by (unspecified) ‘facilities in Lewes’ as shown in Figure 47 below. Respondents’ preferred destination is Buzz Bingo in Brighton.

Figure 47 – Bingo / casino provision and market share by catchment area zone

Destination	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Total catchment area market share (zones 1-15)
Facilities in Lewes [1]	100%	-	-	-	20.3%	-	-	8.3%
Buzz Bingo, Festival Way, Brighton	-	-	34.4%	64.0%	20.3%	-	100%	26.1%
(Don't know / varies)	-	100%	65.6%	36.1%	-	-	-	10.3%

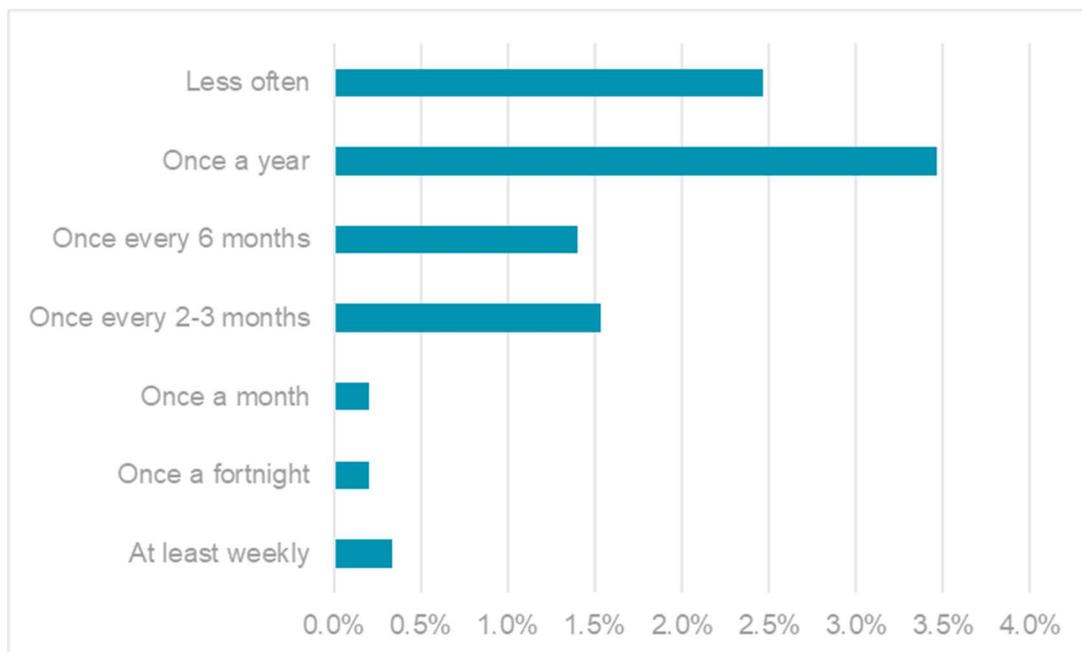
Source: Question 29 of household telephone survey (Appendix iii).

Notes: [1] Destination(s) not given in the household telephone survey.

Ten-Pin Bowling

Ten-pin bowling is a long-established commercial leisure activity, particularly for families and social groups. Like cinemas, however, such facilities were heavily affected by the pandemic-induced trading restrictions and tend to attract occasional (or less frequent) visits as shown in Figure 48 below. Some 89% of respondents to the household telephone survey indicated that they ‘never’ go ten-pin bowling

Figure 48 – Frequency of visits to: Ten-pin bowling



Source: Question 24 of household telephone survey (Appendix iii).

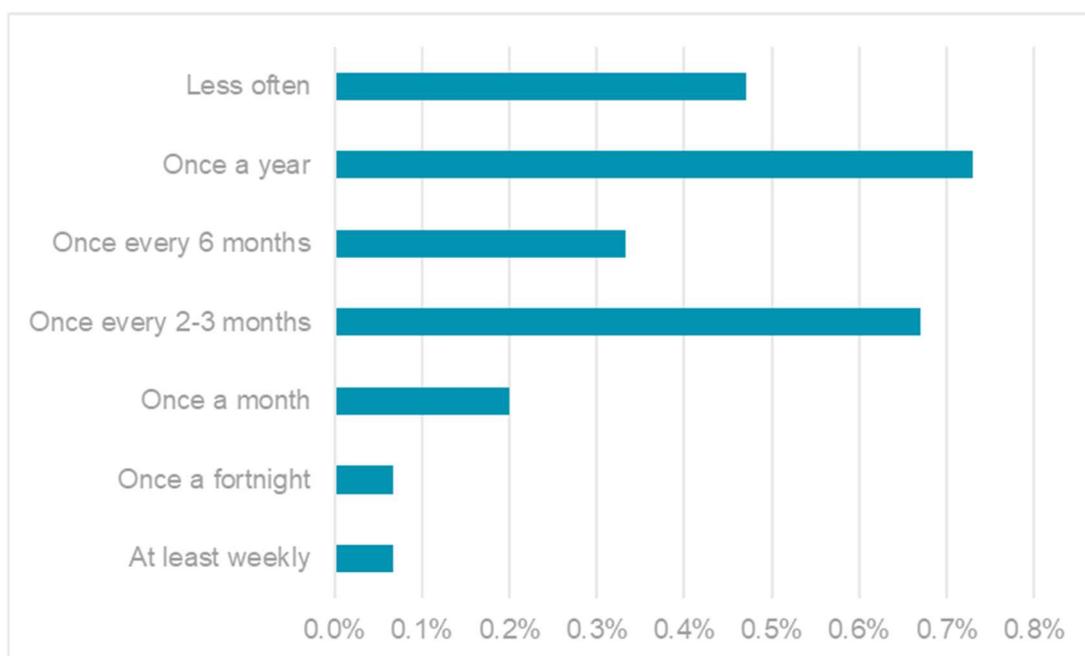
There are no ten-pin bowling facilities in Lewes District / Lewes Town. The closest provision is Brighton Marina’s Hollywood Bowl and Tenpin at Hampden Park (Eastbourne Borough), both of which cater for residents across zones 1-7 according to the survey research.

Indoor Trampoline

Trampoline parks have been one of the fastest growing sport and leisure trends in the past ten years, catering particularly well for younger age groups and therefore attracting families and groups. Like ten-pin bowling, however, trampolining tends to be an occasional leisure experience.

Confirming this, Figure 49 below shows how often “jumpers” visit indoor trampoline facilities based on the results of the household telephone survey. Around 96% of respondents indicated that they ‘never’ visit such facilities.

Figure 49 – Frequency of visits to: Indoor trampoline



Source: Question 24 of household telephone survey (Appendix iii).

In terms of existing provision, Sky High in Peacehaven is the catchment area’s second most popular trampoline park (securing an overall market share of 25.4%) behind Urban Jump in Heathfield. Both of these facilities are situated on industrial estates.

Figure 50 – Indoor trampoline provision and market share by catchment area zone

Destination	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Total catchment area market share (zones 1-15)
Sky High, Meridian Ind. Estate, Peacehaven (out-of-centre)	50.0%	-	-	-	100%	100%	100%	25.4%
Urban Jump, Ghyll Road Ind. Estate, Heathfield	-	-	25.8%	100%	-	-	-	36.6%
Fun Abounds Trampoline Centre, Bell Lane, Uckfield	-	-	31.0%	-	-	-	-	2.7%
(Don’t know / varies)	50.0%	50.0%	17.5%	-	-	-	-	18.0%

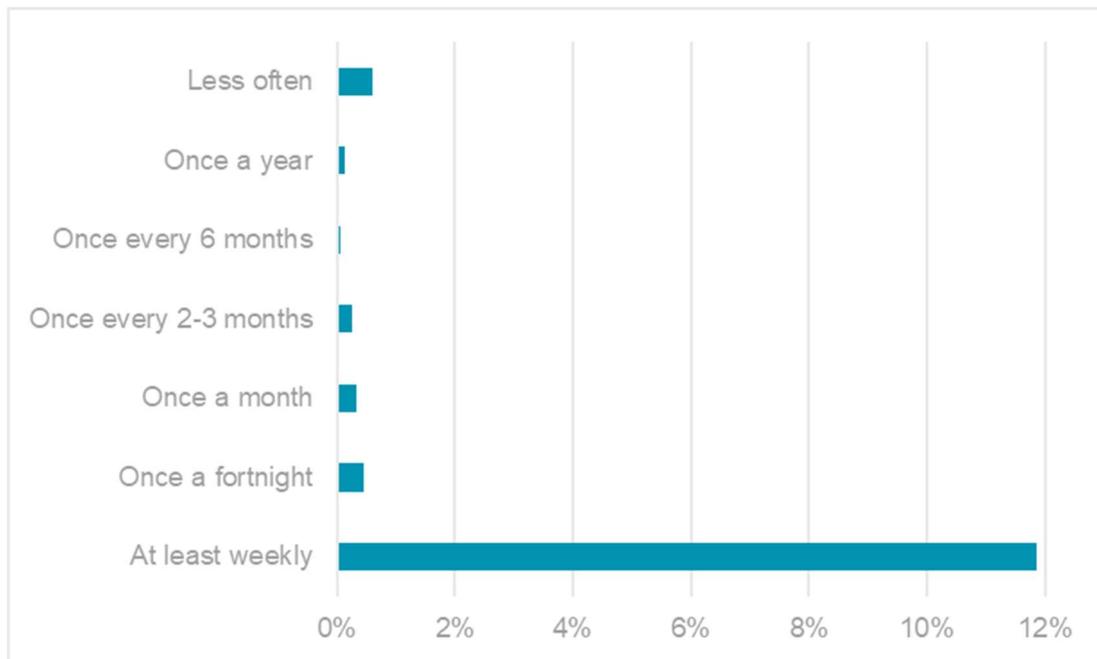
Source: Question 31 of household telephone survey (Appendix iii).

Gym / Health Club / Sports Facility

Notwithstanding the impact of the pandemic on this sector, gyms and health & fitness facilities make an important contribution towards town centre footfall and activity. The budget operators offering flexible and discounted subscriptions have experienced the most significant growth in recent years, while female-only gyms are growing in popularity, yet all operators are faced with increasing competition from 'at home' digital fitness platforms and equipment.

Whilst 85% of respondents to the household telephone survey do not visit gyms and health & fitness facilities, Figure 51 below shows that around 12% visit at least weekly.

Figure 51 – Frequency of visits to: Gym / health club / sports facility



Source: Question 24 of household telephone survey (Appendix iii).

Figure 52 below identifies some of the main public and private gyms and health & fitness facilities in Lewes District / Lewes Town, as identified through the household telephone survey. It shows that the majority of facilities are situated in 'non-central' locations, with only limited provision in the town centres (namely Newhaven, Ringmer and Lewes).

Figure 52 – Gym/ health club/ sports facility provision

Facilities	Location
Newhaven (Town Centre) District Retail Centre:	
EasyTone Ladies Fitness	High Street
Seahaven Swim & Fitness Centre	Chapel Street
Ringmer Local Centre:	
Gro-Fit Training	Springett Avenue
Elsewhere in Lewes District:	
Peacehaven Leisure Centre	Greenwich Way, Peacehaven (out-of-centre)
The Downs Leisure Centre	Sutton Road, Seaford (out-of-centre)
Underground Gym	Avis Way, Newhaven (out-of-centre)
Lewes Town Centre (SDNP):	
Body Happy	Friars Walk
Elsewhere in Lewes Town (SDNP):	
Lewes Leisure Centre	Mountfield Road, Lewes (out-of-centre)
The Body Workshop	Brook Street, Lewes (edge-of-centre)

Source: Question 32 of household telephone survey (Appendix iii).

Summary and Accommodating Commercial Leisure Needs

The commercial leisure sector is dynamic and changing rapidly. As highlighted earlier, there is no robust method for assessing commercial leisure needs in quantitative terms owing to the unpredictable nature of leisure trips and a lack of reliable performance data.

This section has therefore reviewed the commercial leisure needs in Lewes District / Lewes Town in qualitative terms, supported by the results of the household telephone survey and other sources of data.

Having assessed the current supply of key leisure facilities, including regard for survey-indicated participation rates and the main destinations, we set out below any deficiencies in the commercial leisure offer and advise whether any new provision should be planned for.

The survey research has confirmed that eating and drinking out is the most popular leisure-based activity in the catchment area, with almost 70% of respondents to the household telephone survey visiting restaurant/ cafes and over 42% visiting pub/ bar/ nightclubs. Participation in other types of leisure-based activities is much lower, and also less frequent.

Seaford Town Centre is a main destination for eating and drinking out in the District; and we have assessed that its F&B offer is reasonable yet largely limited to independent cafes/ restaurants, takeaways and pubs. Although the absence of branded catering options is not a discernible weakness – recognising that distinguished F&B provision can often help destinations to stand out and attract visitors – there appears scope to improve the Town Centre’s family-orientated and/or experience-based F&B offer. However, without a strong commercial leisure ‘anchor’ such as a cinema or ten-pin bowling and/or substantial new residential development in or close to Seaford Town Centre, we consider that growing and improving the centre’s F&B offer is likely to be difficult.

Lewes Town Centre has a relatively modest scale of F&B provision considering its size and function as a popular visitor destination; but is otherwise served by a good mix of branded restaurants, bars, and independent caterers and coffee shops. The centre's commercial leisure offer is further supported by the District's only cinema, Depot, albeit this 3-screen cinema occupies an edge-of-centre location close to the train station.

Each of the District's smaller centres, with the exception of Ringmer and Newick Local Centres given their very small scale, currently lack representation by F&B outlets of a type and scale capable of attracting visitors and supporting activity throughout the day and into the evening.

In terms of accommodating new commercial leisure provision, market demand is likely to be focused on Seaford Town Centre and Lewes Town Centre as the largest centres in the District. A review of potential development opportunities to accommodate future assessed needs is beyond the scope of this Study; however, there appears to be limited physical capacity to provide further commercial leisure facilities other than repurposing vacant or under-utilised shop units for leisure uses.

For the District's smaller centres, existing shop units are likely to meet any demand for new commercial leisure provision, as and when suitable units become available.

Overall, while there are gaps in the District's commercial leisure offer, with a degree of reliance on larger surrounding destinations such as Brighton and Eastbourne for leisure-based activities, we consider there is no need for LDC to allocate specific sites for new leisure provision in the District (this includes cinemas, bingo/ casino facilities, ten-pin bowling and trampoline parks). A more flexible approach is recommended. Indeed, in the longer term, as the catchment area population increases and new development proposals emerge, there may be additional demand for commercial leisure facilities, in which case any such provision should be directed to the District's centres in accordance with the sequential approach to strengthen their diversity of uses and overall vitality. Larger format uses should be encouraged in Seaford Town Centre (and Lewes Town Centre) in particular, commensurate with its position in the retail hierarchy and to improve its role as a main 'evening economy' destination. These are more likely to come forward as part of mixed-use schemes (as opposed to standalone formats) for commercial viability reasons.

. The town centre policies of the new Local Plan should be sufficiently flexible to ensure that proposals of this nature are supported in appropriate locations.

8. TOWN CENTRE BOUNDARIES & PRIMARY SHOPPING AREAS

Introduction

In this section, we review the town centre boundaries and primary shopping areas for the following centres in Lewes District:

- Seaford Town Centre;
- Peacehaven (Meridian Centre) District Retail Centre;
- Newhaven (Town Centre) District Retail Centre;
- Peacehaven (South Coast Road/Telscombe Cliffs) Local Centre;
- Ringmer Local Centre; and
- Newick Local Centre.

Town Centre Boundaries

Annex 2 (Glossary) of the NPPF defines a 'town centre' as:

Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

The NPPF requires local plans to define the extent of town centres (paragraph 86b) and to keep town centre boundaries under review (paragraph 86d) so that meeting anticipated needs for retail, leisure, office and other main town centre uses – looking at least ten years ahead – is not compromised by limited availability of suitable sites.

Sections [6] and [7] of this report contain up-to-date assessments of the need for retail and leisure development in the District. Those assessments have informed our review of the town centre boundaries. We have identified very limited capacity for additional convenience goods floorspace in Seaford Town Centre (about 550 sqm net sales area in 2025) and 'negative' capacity in each of the District's other centres. We have also identified substantial 'negative' capacity for comparison goods floorspace across the District. In terms of commercial leisure development, we have assessed that there is no need to allocate specific sites and that vacant and/or under-utilised shop units should help to accommodate any future market demand. Yet, recognising that main town centre uses are not limited to retail and leisure development, it is appropriate to consider extending some of the town centre boundaries to better reflect the distribution of such uses.

To that end, our review necessarily takes account of the implications of recent planning reforms. These comprise the Use Classes Order including the 'new' Class E; and the permitted development right (PDR) effective since August 2021 allowing the conversion of Class E uses to residential. Class E encompasses many – but not all – main town centre uses as well as some non-main town centre uses (e.g. clinics, health centres, creches). Whilst the NPPF makes no provision for this change to the Use Classes Order, Class E reflects the Government's intention to support the adaptation of town centres and, therefore, our review considers whether it is appropriate and justified to revise any boundaries to account for this broader range of uses.

Meanwhile, a new PDR introduced in 2021 allows for the change of use from Class E uses to residential (extending a right that had previously been restricted to offices). It is subject to maximum size requirements (up to 1,500 square metres), the property having been in use as Class E for two years, and the property having been vacant for three months. In

addition to this, 'Prior Approval' for the change of use must be sought from the local planning authority. Restrictions on this right apply for listed buildings¹² as well as in areas that are covered by Article 4 directions.

In this context, our review provides an evidence base to inform the town centre boundaries for the emerging Local Plan Policies Map. It is intended to update the boundaries identified on the Lewes Local Plan Part 2 Policies Map (adopted February 2020) for Seaford Town Centre; Peacehaven (Meridian Centre) District Retail Centre; Newhaven (Town Centre) District Retail Centre; and Ringmer Local Centre¹³. For the other Local Centres of Peacehaven (South Coast Road/Telscombe Cliffs) and Newick, we understand there are no pre-defined town centre boundaries.

Thus, using the existing development plan boundaries (where available) as our starting point, we carried out town centre inspections during [September and October 2022] in conjunction with our survey work for the healthcheck audits. Factors relevant to the town centre boundary reviews include:

- the location and nature of existing uses within and at the edges of each centre;
- the location of vacant units and their potential for re-use; and
- each centre's built form and other physical barriers (such as main roads or railway lines).

Our proposed town centre boundaries are included at Appendix iv. Our proposed town centre boundaries are included at Appendix iv. The following provides an overview of the changes recommended for each centre:

- Seaford Town Centre: we recommend extending the town centre boundary to include 37 Church Street (including police station and council offices), community hall and public house (The King's Head) to the south; the shops and services on the south side of Sutton Road; and the full extent of the Tesco Express store off Sutton Park Road to the north. We further recommend contracting the town centre boundary to the south to reflect the distribution of residential dwellings (to the east of South Street and Saxon Lane respectively).
- Peacehaven (Meridian Centre) District Retail Centre: we recommend extending the town centre boundary to include Peacehaven Leisure Centre and car park to the east; and we also recommend contracting the town centre boundary so as to exclude the playing fields to the north.
- Newhaven (Town Centre) District Retail Centre: we recommend that no changes are necessary.
- Peacehaven (South Coast Road/Telscombe Cliffs) Local Centre: in the absence of an existing defined town centre boundary, our recommendations are shown in Appendix iv broadly reflecting the distribution of main town centre uses.
- Ringmer Local Centre: in the absence of an existing defined town centre boundary, our recommendations are shown in Appendix iv broadly reflecting the distribution of main town centre uses.
- Newick Local Centre: in the absence of an existing defined town centre boundary, our recommendations are shown in Appendix iv broadly reflecting the distribution of main town centre uses.

Primary Shopping Areas

Annex 2 (Glossary) of the NPPF defines a 'primary shopping area' as *where retail development is concentrated*.

The extent of a centre's primary shopping area determines whether a site or building should be considered in-centre (i.e. within the primary shopping area), edge-of-centre or out-of-centre; and is therefore key to the application of the sequential and impact tests set out in the NPPF.

Edge-of-centre is defined as:

¹² Although the right does, otherwise, apply in conservation areas.

¹³ The designation 'Retail facilities in Ringmer' on Inset Map 4 (Ringmer & Broyle Side) appears to be the de facto town centre boundary.

For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Out-of-centre is a location which is not in or on the edge of a centre.

There is no longer a national policy requirement to define primary and/or secondary shopping frontages¹⁴. Paragraph 002 of the PPG does state that local planning authorities may, where appropriate, wish to define frontages *where their use can be justified in supporting the vitality and viability of particular centres*. However, we consider that the definition and application of primary and secondary frontages is now outdated – not least since the changes to the Use Classes Order¹⁵ introduced in September 2020 – and too inflexible. In our view, frontage policies can constrain the delivery of a mix of non-retail uses and activities that, as well as helping to support retail, can add significantly to the overall health and attractiveness of town centres in a manner that Class E generally provides for.

Moreover, in the light of the introduction of Class E and the new PDR allowing changes of use from Class E uses to residential without the need for planning permission (albeit subject to ‘Prior Approval’ and the need to satisfy certain criteria), the relevance of defining a primary shopping area (PSA) is becoming less apparent, in our view, other than for its important role in both the sequential and impact tests. This is further underlined by the findings of this Study, which show only limited capacity for convenience goods floorspace and substantial ‘negative’ capacity for comparison goods floorspace, as well as a significant reduction in retailer demand.

In this context, with the exception of Seaford Town Centre, we consider that the existing centres are relatively small and do not lend themselves to the identification of a PSA that is different to the wider town centre boundary. As such, for the District Retail Centres and Local Centres, we would recommend that the PSA extends to the same area as the town centre boundary shown in Appendix iv.

Our proposed PSA for Seaford Town Centre is also shown in Appendix iv and combines the existing primary shopping areas into a single defined area.

¹⁴ Prior to the latest NPPF (July 2021), national policy defined primary shopping areas as areas *where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage)*.

¹⁵ Including the ‘new’ Class E encompassing retail, commercial, business and service uses.

9. SUMMARY & POLICY RECOMMENDATIONS

Introduction

This Study has been prepared by Cushman & Wakefield and CPW Planning and provides the evidence base to assist the Council with its work on the emerging Local Plan, and to support the development management function of the local planning authority.

We summarise below the key findings and conclusions before making a series of policy recommendations.

Study Findings and Conclusions

Health & Function of the Main Centres

Seaford Town Centre

Seaford Town Centre is located on the south coast of England, and at the southern boundary of Lewes District Council. The centre contains Seaford station, a large Morrisons Supermarket, and Broad Street forms the focus of the remainder of the retail offering, which houses a good mix of independent and national retailers. It is a generally a well-maintained, attractive centre, and the vacancy rate is very low, leading to the perception of a healthy, well-used centre.

Market rents in Seaford Town Centre are towards the upper end of the rents in those centres assessed in this report; this rental figure, in particular combined with the other performance indicators for the town, demonstrates Seaford has a healthy town centre.

Peacehaven (Meridian Centre)

Peacehaven (Meridian Centre) principally comprises a shopping centre and its surrounding car parking, with a leisure centre to the east that has its own separate car parking. The vacancy rate for this centre on a per unit basis is very high at 27% of all units. This influences the overall perception of the centre, which has a lot of blank frontages and vacant storefronts.

Market rents are the lowest of all the town centres assessed within this report, which aligns with our perception of the town centre as struggling, in particular when examined alongside the high vacancy rates.

Newhaven Town Centre

Newhaven Town Centre is a predominantly pedestrianised retail centre surrounded by a small ring road. The town centre is one of the primary clusters of retail in the town, however it is segmented by the River Ouse to the east from both Newhaven Town train station and a large retail warehouse development that contains a number of national retailers such as The Range, B&Q, and Sainsbury's, amongst many others.

This centre has the second-highest vacancy rate on a per unit basis and the highest on a floorspace basis within this report, and at 20% on a per unit basis is higher than the PROMIS 200 retail centre average vacancy rate of 19.1%. Market rents in Newhaven Town Centre are the second lowest of the centres assessed within this report, further verifying our conclusions that this is not currently a healthy town centre.

Peacehaven (South Coast Road/ Telscombe Cliffs)

Peacehaven (South Coast Road/ Telscombe Cliffs) is a linear retail parade along either side of South Coast Road, extending to approximately 0.5 miles in length; the centre is dominated by this road, which has lots of vehicular traffic. Whilst there are several crossing points, this road does make travelling between shops difficult. In terms of street furniture and planting, there is very little beyond the crossing points, and little to encourage people to spend time in the centre beyond

visiting shops. The majority of the shops themselves are well maintained, and the general perception of the centre as at our site visit was of a healthy retail thoroughfare.

This centre has very low vacancy rates on both a per unit and a floorspace basis. Market rents are close to the upper end of rents for town centres assessed within this report, which aligns with our overall analysis that this is a healthy, strong retail centre.

Ringmer

Ringmer is a small village situated approximately 2.5 miles north east of Lewes town centre. This centre is the principal retail location for the village of Ringmer itself, which predominantly comprises low-density housing; as this is the largest village in the local area, the nearest retail centre of scale is Lewes. Only one of the seventeen units was vacant at the time of our visit, and the majority of the tenants were small local/ regional multiples or independents.

Market rents are the highest of any town centre assessed within this report which alongside the other performance metrics highlighted here aligns with our overall analysis that this is a healthy, strong retail centre.

Newick

Newick is a small village situated approximately 3.4 miles west of Uckfield, 5.5 miles east of Haywards Heath and 6.7 miles north east of Burgess Hill. This centre sits on the western edge of the town of Newick, and is centred around the village green, and then south along the Green and Church Road. . Properties within the town are attractive, and are generally well-maintained. Market rents in the centre are currently towards the middle/ upper end of centres assessed within this report, thus suggesting this is overall a healthy, strong retail centre.

Retail Capacity Forecasts & Implications

The retail capacity forecasts prepared for this Study are based on two scenario assessments:

- Scenario A – retail needs for Lewes District as a whole including Lewes Town (SDNP); and
- Scenario B – retail needs disaggregated between Lewes Town (SDNP) and the rest of Lewes District.

Both sets of forecasts represent the ‘baseline’ scenario for new retail floorspace in Lewes District / Lewes Town, in which we assume that the 2022 survey-derived pattern of market shares of convenience and comparison goods expenditure, in each of the shopping destinations modelled, remains unchanged throughout the forecasting period.

The summary table below shows our individual capacity forecasts for convenience goods floorspace in the shopping destinations modelled, together with our Scenario A (i.e. combined) forecasts for Lewes District and our Scenario B forecasts disaggregated between Lewes Town and the rest of the District. Although ‘negative’ capacity is forecast in most of the existing centres, there is potential for limited new convenience goods floorspace in Seaford Town Centre and in the ‘non-central’ shopping destinations modelled (although the sequential approach should be applied with a preference for town centre or well connected edge-of-centre sites). Future needs are split broadly evenly between Lewes District and Lewes Town until the middle of the plan period, when forecast capacity increases over the period to 2040 to about 1,050 sqm net sales area in Lewes District and about 700 sqm net sales area in Lewes Town.

The amount of convenience goods floorspace ‘need’ forecasted, disaggregated between Lewes Town and the rest of the District (and recognising that longer-term capacity forecasting is uncertain and should be treated with a degree of caution), is unlikely to be sufficient to support new foodstore development. Such expenditure-based capacity does, however, have the potential to be met organically through changes of use and/or repurposing; or support the improvement and/or replacement of existing foodstore provision.

Figure 53 – Summary of capacity forecasts: convenience goods (sqm net sales area)

	2025	2030	2035	2040	Table number (Appendix ii)
Seaford Town Centre	550	650	700	750	13
Peacehaven (Meridian Centre)	-850	-800	-800	-800	21
Newhaven (Town Centre)	n/a	n/a	n/a	n/a	29
Peacehaven Local Centre	-300	-250	-250	-200	37
Ringmer Local Centre	-100	-100	-100	-100	43
Newick Local Centre	-100	-100	-100	-100	49
Non-central stores in Lewes District	1,200	1,400	1,450	1,500	58
Lewes Town Centre (SDNP)	-100	-50	-	-	66
Non-central stores in Lewes Town (SDNP)	500	600	650	700	75
SCENARIO A					
Combined forecasts for Lewes District / Lewes Town	800	1,350	1,550	1,750	
SCENARIO B					
Aggregate forecasts for Lewes District (outside SDNP) only	400	800	900	1,050	
SCENARIO B					
Aggregate forecasts for Lewes Town (within SDNP) only	400	550	650	700	

Notes:

a) The forecasts are cumulative i.e. the forecasts for each year include the forecasts for the previous years and are not additional to those earlier forecasts.

b) Forecasts rounded to the nearest 50 sqm net.

In contrast, the position in respect of comparison goods floorspace represents a theoretical over-supply of such floorspace across Lewes District / Lewes Town from 2025 onwards, as set out in the summary table below. This is broadly consistent with market trends and a reduction in retailer demand. The capacity forecasts indicate that comparison goods floorspace ‘over-supply’ is slightly greater in Lewes District compared to Lewes Town, which can largely be attributed to our individual forecasts for the Non-central stores in Lewes District.

A review of potential development sites is beyond the scope of this Study; however, there are good opportunities in some of the District’s centres for rationalising and/or repurposing comparison goods floorspace, which may be either vacant or under-utilised. To that end, the findings in respect of comparison goods floorspace ‘needs’ point to the appropriateness of a more flexible policy response as considered in the Policy Recommendations section on page 76 of this report.

Figure 54 – Summary of capacity forecasts: comparison goods (sqm net sales area)

	2025	2030	2035	2040	Table number (Appendix ii)
Seaford Town Centre	-100	-200	-300	-400	13
Peacehaven (Meridian Centre)	-	-50	-50	-50	21
Newhaven (Town Centre)	-	-50	-50	-100	29
Peacehaven Local Centre	-	-	-50	-100	37
Ringmer Local Centre	n/a	n/a	n/a	n/a	43
Newick Local Centre	n/a	n/a	n/a	n/a	49
Non-central stores in Lewes District	-1,000	-1,050	-1,150	-1,250	58
Lewes Town Centre (SDNP)	-200	-350	-500	-700	66
Non-central stores in Lewes Town (SDNP)	-500	-550	-600	-650	75
SCENARIO A					
Combined forecasts for Lewes District / Lewes Town	-1,800	-2,250	-2,700	-3,250	
SCENARIO B					
Aggregate forecasts for Lewes District (outside SDNP) only	-1,100	-1,350	-1,600	-1,900	
SCENARIO B					
Aggregate forecasts for Lewes Town (within SDNP) only	-700	-900	-1,100	-1,350	

Notes:

a) The forecasts are cumulative i.e. the forecasts for each year include the forecasts for the previous years and are not additional to those earlier forecasts.

b) Forecasts rounded to the nearest 50 sqm net.

The retail capacity forecasts serve as a guide for future planning policies and decisions on planning applications. The forecasts should be reviewed regularly in the light of actual population and (in particular) expenditure growth, the outlook for which is subject to change given macro-economic conditions.

Commercial Leisure Needs

This Study has considered how commercial leisure uses and activities play an important role in contributing to the vitality and viability of the District’s centres. This is particularly the case in respect of the largest centres, namely Seaford and Lewes Town Centres, both of which have reasonable F&B offers.

There appears to be scope to improve Seaford Town Centre’s family-orientated and/or experience-based F&B offer, although this is likely to be difficult without a strong commercial leisure ‘anchor’ such as a cinema or ten-pin bowling and/or substantial new residential development in or close to the Town Centre.

Lewes Town Centre includes the District’s only cinema and commercial leisure attraction of note.

In terms of accommodating new commercial leisure provision, market demand is likely to be focused on Seaford Town Centre and Lewes Town Centre. A review of potential development opportunities to accommodate future assessed needs is beyond the scope of this Study; however, there appears to be limited physical capacity to provide further commercial leisure facilities other than repurposing vacant or under-utilised shop units for leisure uses.

For the District’s smaller centres, existing shop units are likely to meet any demand for new commercial leisure provision, as and when suitable units become available.

While there are gaps in the District’s commercial leisure offer, with a degree of reliance on larger surrounding destinations such as Brighton and Eastbourne for leisure-based activities, we consider there is no need for LDC to allocate specific sites for new leisure provision in the District (this includes cinemas, bingo/ casino facilities, ten-pin bowling and trampoline parks). In the longer term, as the catchment area population increases and new development proposals emerge, there may be additional demand for commercial leisure facilities, in which case any such proposals should be subject to the ‘town centres first’ sequential approach. Larger format uses should be focused in or on the edge of Seaford Town Centre (and Lewes Town Centre) as a priority given its role and position in the retail hierarchy.

Policy Recommendations

In accordance with our instructions, we critically review and consider below whether the provisions of Core Policy 6 (Retail and town centres) set out in the Joint Core Strategy are fit-for-purpose, or whether any policy revisions and/or additional provisions are necessary to ensure the emerging Local Plan reflects the updated evidence base and is consistent with the NPPF.

Part 1 of Core Policy 6 identifies a three-tier retail hierarchy:

- i. Main Town Centres – comprising Lewes and Seaford;
- ii. District Retail Centres – comprising Peacehaven (Meridian Centre) and Newhaven; and
- iii. Local Centres – comprising Peacehaven (South Coast Road/Telscombe Cliffs), Ringmer, Newick and Ditchling.

As an approach, this is consistent with the NPPF (paragraph 86a) requirement that planning policies should *define a network and hierarchy of town centres*. Town centres are defined¹⁶ as:

Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres (emphasis added).

Part 1 of the policy supports development that reinforces or enhances the identified role of each centre in the retail hierarchy. Those roles are set out in the Development Plan (Lewes District Local Plan: Joint Core Strategy (2016)) subsection on Page 6 of this report and we discuss further below in terms of the Council’s stated policy approaches to (for example) changes of use within shopping areas/frontages.

However, we consider the table below paragraph 7.58 of the Joint Core Strategy provides a clearer definition of the intended role of each centre in the retail hierarchy (as follows):

¹⁶ NPPF, Annex 2 (Glossary).

Main Town Centres:

Main town centres are the prime focus for a range of retail units including high street chains, other business, cultural and leisure uses. These towns are not reliant upon other centres to meet day to day needs...

District Retail Centres:

District retail centres provide a range of convenience and comparison retail goods, but rely on larger retail centres such as Lewes, Seaford and Brighton to provide a wider range of retail goods and services...

Local Centres:

Local centres provide for more limited needs and provide a level of basic goods to support the day to day needs of the residents but do not perform a 'self-sufficient' function...

Based on the findings of the updated evidence base, including our healthcheck assessments and the household telephone survey of shopping patterns, we consider it remains appropriate to define a three-tier retail hierarchy. In particular – and noting that the centres of Lewes and Ditchling are beyond the scope of this Study insofar as assessing their relative health and position in the retail hierarchy – we would recommend that the new Local Plan defines the following network and hierarchy of town centres:

- i. Town Centres – including Seaford;
- ii. District Centres – including Peacehaven (Meridian Centre) and Newhaven; and
- iii. Local Centres – including Peacehaven (South Coast Road/Telscombe Cliffs), Ringmer and Newick.

Seaford Town Centre is a main destination for shopping, services and evening economy (notably F&B) activities in the District and should therefore remain at the apex of the District's retail hierarchy.

We consider it remains suitable to define Peacehaven (Meridian Centre) and Newhaven as second-tier centres in the retail hierarchy, providing a basic range of shopping facilities and services to meet the day-to-day needs of local residents. In this respect, these two centres have limited functions (relative to Seaford Town Centre) and are also the District's centres most in need of development and improvement. We have suggested removing 'Retail' from the existing District Retail Centre classification to emphasise that these centres will require a broader mix of uses in order to remain relevant and function as healthy centres over the plan period.

With regards to Local Centres in the retail hierarchy, although Peacehaven (South Coast Road/Telscombe Cliffs) Local Centre is larger and serves a broader function than Ringmer and Newick Local Centres, it is a relatively dispersed centre and serves a localised catchment.

Part 2 of Core Policy 6 refers to the sequential and impact tests. As currently worded, however, the provisions are not consistent with the NPPF insofar as:

- the sequential test applies to main town centre uses (i.e. not just retail development proposals); and
- the impact test concerns retail and leisure development proposals.

Thus, the sequential and impact tests set out in the NPPF are relevant when assessing planning applications *for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan*¹⁷ (for sequential test purposes) or *for retail and leisure development outside town centres, which are not in accordance with an up-to-date local plan*¹⁸ (for impact test purposes).

As such, new policy should make it clear that the preferred location for main town centres uses is the District's existing centres, *then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered* in accordance with the NPPF (paragraph 87).

¹⁷ NPPF paragraph 87.

¹⁸ NPPF paragraph 90.

Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale when applying the sequential test, as the NPPF (paragraph 88) requires.

With regards to the impact test, to ensure consistency with the NPPF (paragraphs 90 and 91), new policy should make it clear that relevant applications for retail and leisure development should not have a significant adverse impact on one or more of the following considerations:

- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

Paragraphs 014 to 018 of the Town centres and retail section of the PPG (as updated on 18 September 2020) set out the Government's further guidance on the application of the impact test, both in relation to plan-making and decision-taking.

Furthermore, the NPPF (paragraph 90) states that the impact test only applies to proposals over 2,500 sqm gross unless there is a different proportionate, locally set floorspace threshold. Part 2 of Core Policy 6 sets the following floorspace thresholds for such purposes:

- Main Town Centre – 750 sqm
- District Centre – 500 sqm
- Local Centre – 250 sqm

We are of the view that it remains necessary for LDC to set its own floorspace thresholds, to ensure the local planning authority can assess and control the impact of proposed new retail and leisure development outside the existing centres (including changes of uses and applications to extend existing facilities). We consider the NPPF 'default' floorspace threshold of 2,500 sqm gross is inappropriate for Lewes District, not least because this scale of development would far exceed the retail capacity forecasts for the centres modelled. This floorspace threshold is also substantial in relation to the District's smaller centres, where competing new development much smaller than 2,500 sqm gross could potentially have a significant adverse impact on their vitality and viability.

We therefore consider that a lower, simplified threshold of 500 sqm gross (for all tiers of the retail hierarchy) would be appropriate in relation to Class E(a) retail development proposals in addition to leisure development proposals – including Class E(b) food and drink, Class E(d) indoor sport and recreation, and 'sui generis' F&B and cinemas. Proposals in excess of 500 sqm gross are likely to have adverse impacts and make it more difficult to attract the limited pool of retail/leisure operator demand that exists into town centre locations.

If this approach to locally set floorspace thresholds (for the purpose of impact testing) is followed as part of the Local Plan review process, then policy should acknowledge that impact assessments should be proportionate to the scale and nature of retail and/or leisure development proposed, as indicated by the PPG (paragraph 017) which states:

The impact test will need to be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Ideally, applicants and local planning authorities should seek to agree the scope, key impacts for assessment, and level of detail required in advance of applications being submitted.

Part 3 of Core Policy 6 relates to pedestrian and cycle linkages to the town centre closest to development proposals in edge-of-centre or out-of-centre locations. It specifically requires such proposals to provide, enhance, or make contributions to, improved pedestrian and cycle linkages to the town centre. We support this in principle to help ensure that town centre facilities are well connected and accessible by sustainable forms of transport, including public transport.

Part 4 of the policy seeks to retain local shops in locations not identified in the retail hierarchy unless it can be demonstrated that such facilities (a) are no longer viable or (b) will be re-provided within the same locality. It goes on to state that proposals for new small scale rural retail and community facilities will be encouraged where they provide for local needs.

Considering the terms of the sequential test, which seeks to focus retail and other main town centre uses in ‘town centres first’ to ensure their vitality and viability, there appears on the face of it a slight tension with a policy approach that affords such support for ‘non-central’ shopping facilities. However, we note the NPPF (paragraph 89) confirms that the sequential test does not apply to applications for small scale rural development¹⁹. We further recognise that local shops in the District’s rural areas are likely to provide an important local function and reduce the need to travel.

It is therefore our view that any replacement policy in the new Local Plan should align with the definition of local community ‘shops’ as set out in the Use Classes Order, as follows:

- Class F2(a) Shops (mostly) selling essential goods, including food, where the shop’s premises do not exceed 280 square metres and there is no other such facility within 1000 metres

The Council may also wish to consider broadening the policy response to include Class F2(b) (i.e. *Halls or meeting places for the principal use of the local community*) and/or Class E(e) (i.e. *Provision of medical or health services*), as well as other uses (e.g. day centres, public houses), given the important local role such uses can play in supporting rural communities.

Turning to the NPPF (paragraph 86d) requirement for planning policies to *allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead*, this Study has assessed the ‘need’ for new retail and commercial leisure floorspace.

Our retail capacity forecasts indicate a theoretical over-supply of comparison goods floorspace across Lewes District (including and excluding Lewes Town) from 2025 onwards. As such, there should be no requirement for LDC to plan for this type of development, except for supporting the continued retail function of the primary shopping areas by promoting a range of complementary uses and footfall-generating attractions. We discuss this further below in terms of a recommended policy approach to changes of use and other proposals within shopping areas/frontages.

As regards the need for additional convenience goods floorspace, we have (under Scenario B for Lewes District excluding Lewes Town) forecast capacity for about 400 sqm net sales area in 2025, rising to about 1,050 sqm net sales area by the end of the plan period. Noting that longer-term capacity forecasts should be treated with a degree of caution²⁰, there is unlikely to be sufficient capacity to support new foodstore development in the District; and thus there should be no requirement for LDC to allocate suitable sites for such development. Rather, the expenditure-based capacity identified is likely to be met organically through changes of use and/or the improvement (or replacement) of existing convenience goods floorspace.

With regards to commercial leisure provision, there is no reliable method for assessing needs in quantitative terms and for this reason alone we would caution against setting floorspace requirements and/or (in the absence of identified commercial leisure operator demand) allocating specific sites. Instead, the town centre policies of the new Local Plan should support the enhancement of F&B and other commercial leisure provision through appropriate changes of use and mixed-use development proposals, including those involving the reconfiguration and modernisation of vacant larger units.

A similar approach should be followed for the District’s smaller centres, where existing units are likely to meet any future leisure (and retail) needs, as and when suitable units become available.

It is relevant that the NPPF no longer requires primary shopping areas to comprise primary and secondary frontages. This corresponds with the changes to the Use Classes Order – including Class E encompassing retail, commercial, business and service uses – which provides greater flexibility for changes of use in town centre locations. In this context, some of the wording set out under Part 1 of Core Policy 6 where the identified role of each centre in the retail hierarchy is described (particularly in respect of the Main Town Centres and District Retail Centres²¹ e.g. *“The loss of retail units that are within*

¹⁹ There is no national policy definition of ‘small scale’ rural development although, in respect of shops, Class F2(a) of the Use Classes Order identifies local community shops – with no other such facility within 1000 metres – as premises not exceeding 280 square metres.

²⁰ As considered in section [5.1.4] of this report.

²¹ However, the policy wording in relation to Newhaven Town Centre is more flexible and supportive of a range of retail and other (non-retail) uses; so too is the wording in relation to the Local Centres.

these defined [shopping] areas and frontages will be resisted") is overly restrictive and fails to recognise that non-retail uses, such as commercial leisure, community and cultural facilities, play an important role supporting town centre vitality and viability as this Study has discussed. Resisting the loss of retail units is further incompatible with reduced retailer demand and the theoretical over-supply of comparison goods floorspace we have forecasted across Lewes District.

Although the NPPF does not preclude planning policies from defining primary and secondary shopping frontages, we are of the view that frontage designations (and associated change of use policies) could have unintended consequences and weaken the ability of the District's centres to adapt and deliver a broader range of uses to support their future health and functionality. Moreover, the operation of this type of policy approach would be affected by the 'new' Class E and, in any event, there is increasing emphasis at the plan-making (and decision-making) stage on qualitative-based assessment factors, focusing on (for example) the nature and character of a proposed use or development, including the level of activity associated with it, and its contribution to the frontage and the overall health of the centre.

Town Centre Boundaries & Primary Shopping Areas

Section 8 of this report describes our recommended approach to defining town centre boundaries and primary shopping areas in the District, and Appendix iv sets out the changes that we propose for each centre.

