

Consultation on Policy Options Papers for Brighton & Hove's City Plan

October 2011

Employment Policy Options Paper



Brighton & Hove
City Council

Employment Policy Options Paper

1. Introduction

1.1 Evidence suggests that Brighton & Hove's economy may be more resilient than during the previous economic slow down. In a study produced by the HSBC (Future of Business Report 2011) Brighton has been recognised as one of 5 'Supercities' that will lead the country's economic recovery. The city has become an alternative business location due to its close proximity and easy access links with London (and Gatwick airport) together with more affordable rental levels for high quality space and it is considered seriously as a business location building on the business sectors that are located here. The key sectors that have been identified for growth are digital media, creative industries, finance, health and environmental technologies, all of which have a growing presence in the city.

1.2 There are 263,300 people living in Brighton & Hove in 2011 according to latest ONS data and current projections suggest that the city's population could increase by 4.8% or 12,650 over the next ten years. If these projections prove accurate, the city may need to find work for an additional 6,000 residents by 2014 just to keep the employment rate at the current level of 71.1%. However these need to be quality jobs that allow people to progress and to earn incomes that will enable them to live successfully and sustainably.

1.3 The City Plan will set the framework for future development in Brighton & Hove up to the year 2030. Therefore both the protection of employment sites and premises and the development of new high grade employment space are fundamental to the economic wellbeing of the city to allow businesses to prosper and grow and are key issues for the City Plan to address.

2.0 Evidence Base

2.1 A number of studies have been produced in the past 5 years looking at the need for commercial space in the city including the City Employment and Skills Plan 2011-14, the Business Retention and Inward Investment Strategy (2009), The Employment Land Study (2006 and revised 2009) and the Creative Industries Workspace Study (2007). All these studies identified the need for commercial space to meet the needs of the city, businesses currently located here and businesses considering Brighton as a business location to allow the city to grow as an economic base for the wider economic area.

2.2 In particular there is the need for high quality office floorspace (Grade 'A' floorspace) and flexible and affordable business floorspace. Developments with floorplates of 500 sqm (c.5,000 sq ft) are considered the optimum size floorplates for the city as they have the ability for single occupancy or easy sub-division to meet demand. Recent evidence shows encouraging number of requirements for office space in excess of 1,000 sq m from a variety of different sectors (e.g. finance, insurance, IT, professionals and healthcare). Whilst many companies would still prefer to own rather than rent, they are finding it much more difficult to obtain finance.

2.3 Looking at the forecast scenarios for employment growth in the city, there is also the need to accommodate an additional 20,000 sq m of B1a office floorspace in the city post 2016 (Employment Land Study 2006). The strong environmental constraints that make Brighton & Hove such an attractive place to live, mean that most new employment floorspace will have to be found by recycling existing employment sites and premises and other redundant sites.

The supply of employment land and premises has been maintained by redevelopment and the more effective and efficient use of existing sites or by the refurbishment and modernisation of existing buildings. However there has been in recent years an increasing pressure for non-employment uses, particularly residential on some sites and in vacant offices and the council is concerned with the erosion of employment sites and premises.

2.4 Through the City Plan the council's preferred approach will be still to identify development areas where particular opportunities for growth, regeneration and/ or inward investment will be directed. These development area policies will specify the amount and type of development that is anticipated to come forward during the plan period (2010-2030) and how the council will support and encourage this development to come forward.

2.5 However through the withdrawal of the Core Strategy there is the opportunity to clarify and strengthen the City Plan with regards to the following issues:

- Issue 1 - Recognition and support of the city's primary office area
- Issue 2 - Accommodating the need for 20,000 sq m additional office floorspace
- Issue 3 - Maintaining an adequate supply of appropriate, affordable office accommodation
- Issue 4 - More specific mention of strategic employment sites and their roles within Development Areas.
- Issue 5 - An appropriate hierarchy and protection of industrial estates and premises that encourages their refurbishment and upgrade
- Issue 6 - Maintaining an adequate supply of appropriate, affordable business, manufacturing and warehouse accommodation

Each is considered in more detail below.

3.0 Issue 1 Recognition and support of the city's primary office area

3.1 The city's office market is principally focused on central Brighton, although there are several well established office locations within Hove, such as, City Park and Preston Road. However, more generally, the core office areas are located on the east and southern side of Brighton Station, within the New England Quarter, interspersed within the city centre. Much of the existing office stock is within older purpose built buildings or converted period buildings. Apart from the new Amex House, due to be completed in December 2011, the City Park development adjacent to Hove Park, in 2005/06, and Trafalgar Place adjacent to Brighton station, completed in 1991/92 were the last major office developments in the city. This lack of substantial new stock, especially in the central area, has resulted in Trafalgar Place continuing to be regarded as the city's prime office development some 20 years later. More recently there has been a small amount of new build as part of the New England Quarter redevelopment. Refurbishment and upgrading of older buildings, such as at Queensbury House in Queens Road has occurred.

3.2 The City Plan will continue to recognise central Brighton¹ as a vibrant employment location attractive to businesses, employees and visitors to the City and an area where a coordinated policy approach will be taken (as previously set out in the withdrawn Core Strategy as SA2 Central Brighton). Over the timeframe of the Plan, central Brighton will continue to remain a location where high quality offices will be demanded. It is therefore felt appropriate that a more positive, proactive approach to meeting the development needs of businesses looking to locate in central Brighton is set out in the City Plan.

Option 1:

Identify within the central Brighton special area policy, central Brighton as the city's primary office location and protect existing office accommodation and encourage their refurbishment and upgrade. In recognition of the variety of type and quality of accommodation within central Brighton the policy would include flexibility around changes of use and redundancy. The policy would also set out the proposals to encourage the delivery of outstanding development opportunities that would secure additional office floorspace in the area.

Advantages:

- Provides a clearer indication of the role central Brighton plays as the city's prime office location.
- Accords with the council's aspirations for central Brighton to be vibrant employment location attractive to businesses, employees and visitors to the City.
- Responds to the need to safeguard commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area.
- Responds to the need for high quality commercial space in the city.
- Would enable an article 4 direction to be applied to central Brighton if potential changes to the planning system that the Government has consulted on are implemented to allow for change of use from office to residential use without the need for planning permission.

Disadvantages:

- May be seen as prescribing to the market where office developments should be located.
- Could be seen as contrary to potential changes to the planning system that the Government has consulted on that might allow for change of use from office to residential use without the need for planning permission.
- If the Government relaxes planning rules to allow for change of use from office to residential without the need for planning permission there would be a cost implication for adopting an Article 4 Direction for central Brighton.

¹Central Brighton extends from Brighton Station in the north to the seafront in the south; with North Laine, The Lanes, The Royal Pavilion Estate and Old Steine to the east and the major seafront hotels, conference centres, Churchill Square shopping centre and major high street retailers along Western Road to the west.

Option 2:

Not to identify within the Central Brighton special area policy the areas role as the city's primary office location and leave the protection of the office accommodation to be dealt with a generic employment protection policy.

Advantages:

- Would be more flexible if the market changes its preferred location for office developments.

Disadvantages:

- Weakens the Plan's ability to safeguard needed office accommodation and encourage the refurbishment and upgrade of office accommodation.
- Does not reflect the role central Brighton plays as the city's prime office location.

4.0 Issue 2 - Accommodating the need for additional office floorspace

4.1 The previous version of the Plan identified the New England Quarter and London Road Development Area as the preferred location to secure the additional 20,000 sq m new office floorspace required to meet the identified forecast need post 2016 (Employment Land Study 2006). This was in recognition of its proximity to the city centre with excellent transportation links, the successful redevelopment of Brighton Station site, the existing creative industries hub in this location, and significant opportunities for more effective and efficient use of existing employment sites in the area (London Road Central SPD).

4.2 The council is not changing the preferred approach set out in the withdrawn Core Strategy that the additional office need is directed to the New England Quarter and London Road Development Area. However, it is reconsidering the options for how that additional office need is delivered.

4.3 Concerns were expressed with the withdrawn Core Strategy over the deliverability and viability of the proposed approach to bringing forward large scale office developments in the city (set out in DA4 New England Quarter and London Road Development Area). Taking into account the current difficulties of securing finance for office developments and the need to ensure that this policy delivers the type and size of office floorspace of greatest demand in the city a revised approach to accommodating the forecast need for a further 20,000 sq m office floorspace post 2016 is considered necessary.

4.4 It is essential that the sites identified to accommodate the additional office floorspace can be developed within the timeframe of the City Plan Part 1 (2010-2030) and are appropriate. As a consequence potential sites have been assessed against the following criteria:

- Availability - whether the site is available now, or likely to be available for development within the timeframe of the City Plan Part 1.
- Suitability - whether the site is in an appropriate and sustainable location (such as whether it offers easy access to public transport and whether the development would adversely affect the character of the area)
- Viability - whether office development is considered economically viable on the site. See appendix 1 for assessments.

Option 1

Through redevelopment and more intensive use of a number of employment sites accommodate a proportion of the 20,000 sq m of office floorspace in the New England Road, New England Street and Providence Place area. The specific site opportunities identified include:

- Vantage Point, Elder Place (including Circus Parade)
- Trade Warehousing (Longley Industrial Estate) 4-6 New England Street
- Richardson's Scrapyard and Brewers Paint Merchant Site, New England Street

The remainder of the 20,000 sq m will be achieved through outstanding opportunities/ existing permissions for B1a office floorspace to be delivered at:

- Block J and K Brighton Station Site
- Cheapside (south between Blackman Street and Whitecross Street)
- Blackman Street Site (land adjacent to Britannia House)
- GB Liners site, Blackman Street
- City College site, Pelham Street

Advantages:

- A specific policy which identifies a range of site to meet the forecast requirements will address the issues of deliverability by indicating where and how the additional floorspace will be brought forward.
- Provides flexibility to accommodate change should some of the sites fail to deliver.
- A more sites specific policy could also indicate an appropriate mix of uses considered acceptable to ensure the viability of bringing forward the office floorspace.
- Spreading the need across a number of sites would also ensure the delivery of the needed floorspace rather than relying on one/ two sites.
- Spreading the need across a number of sites would also reflect that that new office floorspace would not all come onto the market at once.
- A more specific policy can clarify the type of business space required and amounts of development that the sites could deliver.
- A strengthened policy gives the opportunity to emphasise the proactive, positive role council will play in improving quality of public realm and transport to improve the attractiveness of the area as an office location.

Disadvantages:

- May be seen as too detailed/ prescriptive.
- Accommodating the 20,000 sq m is reliant on implementation of a number of outstanding planning permissions.
- Would need clarity on minimum amounts of office floorspace expected to come forward on sites to ensure that the new office provision is deliverable and viable.

Option 2

Through the identification of New England Road and London Road Area as the broad location suitable for accommodating 20,000 sq m of additional office floorspace with allocation of sites to be taken forward in the City Plan Part 2.

Advantages:

- Provides flexibility as to how the office accommodation is brought forward.
- Accords with PPS12 guidance around the role and content of Core Strategies.

Disadvantages:

- Criticism of this approach (set out in the last version of the plan) was that it didn't provide sufficient certainty over how the 20,000sq m was to be delivered; respondents felt that sites should be identified in detail and actions put in place to bring sites forward for development.

Option 3

Strategic allocation of two sites within the New England Quarter and London Road Development Area to accommodate the additional 20,000 sq m additional office floorspace.

Advantages:

- Clearer identification of sites anticipated to accommodate additional office floorspace.
- Would provide the city with high quality large scale office accommodation suitable for significant inward investment opportunity

Disadvantages:

- Given the difficulty of financing office development in the short to medium term it is considered unlikely that offices of these scales would be brought forward speculatively.
- Does not match the greatest volume of demand in terms of office floorspace requirements.

5.0 Issue 3 - Maintaining an adequate supply of appropriate, affordable office accommodation

5.1 Between 1998 and 2008 the private sector employment base of the city grew by 24.8%. In 2008 there were 13,422 businesses in the city. The city of Brighton & Hove has the third highest business stocks per head in England & Wales. Brighton & Hove has a strong entrepreneurial culture, reflected by high levels of start-ups compared with other cities. In 2008 Brighton & Hove had the 6th highest levels of start-up business activity in the country and more recent data suggest the city continues to have a higher than average level of business start up compared with the average for England (BankSearch survey, July 2011).

5.2 Overall, Brighton & Hove has a larger proportion of small and micro businesses employing less than 10 people, and lower proportions of all other sized businesses 86.4% of businesses employ less than 10 people. With the predominance of businesses in the city employing less than 10 people there is continued demand for smaller floorplate office space and this will continue.

5.3 Alongside the specific proposals for Development Areas and the proposed preferred approach set out earlier under Issue 1 to identify central Brighton as the primary office location where existing office accommodation would be protected there is a need to consider the approach to secondary office accommodation. Alternative office accommodation can be found in clusters elsewhere in the city (such as City Park and Preston Road) and scattered across the city. Secondary office accommodation can be found within older purpose built buildings or converted period buildings, upper floor accommodation above shops small workshop style/ mews or modern flexible managed office space/ business centres. The council considers that a good supply of appropriate employment land should continue to be safeguarded to allow for a broad range of business types to serve the city's needs. However the Housing Delivery Options Paper does include some secondary office sites as a potential source of additional supply of housing sites.

Option 1

General policy of protection of secondary office accommodation unless redundancy proven with no preference given to alternative uses.

Advantages:

- Provides landowners/developers with the flexibility for future changes of use from employment land.
- Smaller office spaces more easily adapted to residential use and this would provide a supply of 'windfall' residential sites where redundancy is proven.

Disadvantages:

- Without protection these sites/ premises will be lost to the office market making it harder for small businesses to find space, inflating the rental values of the office space that is left making it less affordable to businesses in the city to remain.
- Housing land often has a higher land value, and this has led to developers looking at employment land to provide new housing. The Council's Employment Land Study highlights the importance of protecting land currently in employment use.
- General policy may not be possible without city wide Article 4 Direction if government policy goes through as was consulted upon in April 2011 (the potential relaxation of the planning rules for change of use from business to residential).

Option 2

Set out a general policy of protection for secondary office accommodation unless redundancy proven but require reuse for alternative employment generating uses and/or affordable housing only (the proportion to be determined following an update of the Affordable Housing Viability Study).

Advantages

- the city still needs to deliver a greater quantity of higher value of economic activity for both its resident population and for the wider South East economy, these opportunities will in the main come from the existing portfolio of employment sites.
- Housing need is a pressing issue in the city and seeking a viable proportion of affordable housing on redundant employment sites will meet the council's priorities to bring forward affordable housing.

Disadvantages

- Too prescriptive and does not provide sufficient flexibility for future changes of use from employment land.
- General policy may not be possible without city wide Article 4 Direction if government policy goes through as was consulted upon in April 2011 (the potential relaxation of the planning rules for change of use from business to residential).

Option 3

No general protection of secondary office accommodation.

Advantages

- Provides landowners/developers with the flexibility for future changes of use from employment land.
- Secondary office space easily adapted to residential use and this would provide an additional source of housing supply.

Disadvantages:

- With the predominance of businesses in the city employing less than 10 people there is a continued demand for smaller floorplate office space and this will continue.
- Would affect the city's ability to meet its employment target of 6,000 new jobs by 2014 as the business base will stagnate due to the lack of available space.
- With potential less commercial space to meet demand available rental levels would increase, reducing the availability of affordable business space which could unduly affect city's growth sectors such as the digital sector.
- Does not address the need for more commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area
- This further flexibility could lead to an uncoordinated and sizeable loss of valuable and accessibly located employment land.

6.0 Issue 4 More specific mention of strategic employment sites and their roles within Development Areas.

6.1 Through the City Plan the council's preferred approach will be still to identify development areas where particular opportunities for growth, regeneration, inward investment will be directed. These development areas will specify the amount and type of development that is anticipated to come forward during the plan period and how the council will support and encourage this development to come forward. Whilst strategic allocations and some mention of key sites were set out in the development proposals, previous planning rules (PPS12 Local Spatial Planning) advised against site allocations in the previous version of the document. However there is now more flexibility for the council to decide what type of policies can be contained in the City Plan including appropriate site allocations. The council considers that more specific mention of strategic employment sites (those sites previously safeguarded through Local Plan policies) and their proposed role could be made within the Development Area proposals and this option paper would allow the merits of the individual sites to be considered.

6.2 It is essential that any sites identified within the Development Area can come forward for redevelopment within the timeframe of the City Plan and are appropriate sites. As a consequence sites have been assessed against the following criteria:

- Availability - whether the site is available now, or likely to be available for development within the timeframe of the City Plan Part 1.
- Suitability - if the site is in an appropriate and sustainable location (such as whether it offers easy access to public transport, is the site in an area of flood risk, and would development adversely affect the character of the area or an area of ecological importance)
- Viability - if redevelopment is likely to be viable.

See appendix 2.

Option 1

No specific allocation of strategic employment sites within Development Area proposals and leave site allocations to City Plan Part 2.

Advantages:

- Accords with PPS12 guidance around the role and content of Core Strategies.
- All site allocations to be considered in the City Plan part 2.

Disadvantages:

- Would not provide certainty to developers and the business community on the council's proposed approach to currently allocated employment sites.
- Would not help clarify how some of the priorities and aspirations for development areas will be delivered.
- Would not reflect the priorities for economic development and growth in the City Plan Part 1.

Option 2

The specific allocation of strategic employment sites and their roles within Development Areas. See Appendix 2 for potential sites and opportunities.

Advantages

- This would provide certainty to developers and the business community on the council's approach to employment sites.
- Will provide more clarify on how some of the priorities and aspirations for development areas will be delivered.
- Reflects the priorities for economic development and growth in the City Plan.

Disadvantages

- Potential for confusion between broad development area aspirations, strategic allocation and employment site allocations unless carefully explained.

7.0 Issue 5 Appropriate hierarchy and protection of strategic industrial estates and premises

7.1 The city's Industrial /Warehousing (B1b, B1c, B2 and B8) stock of circa 300,000 sq m is primarily located on the 21 industrial estates / business parks around the city. They are all relatively small in size and located close to residential areas. Many others are clustered around the Old Shoreham Road, which was traditionally the main east-west route into the city. The vast majority were constructed in the late 1950s early 1960s when car ownership was low and people travelled to work locally wherever possible. These are now becoming dated and are also not best located for modern business requirements; however they still provide valuable employment for the residents of the city. Together with these industrial estates / business parks there are smaller units dispersed throughout the city.

The council has always encouraged developers to bring redundant commercial space back into operational use and with the aid of SRB/AIF programmes in the late 1990s early 2000s there was considerable success in the city in revitalising industrial estates and buildings on them to bring them up to modern day business requirements. Through the Local Plan policy, office floorspace (B1a) has also been allowed on these sites.

7.2 The Employment Land Study (ELS) 2006 and 2009 update assessed these industrial estates/ business parks for their suitability for continued protection for employment use and their ability to accommodate further floorspace. The study found that these established areas remain popular and there were few that could be said to be entirely unsuitable for their current purposes, as demonstrated by local vacancy levels. Comparing the existing stock of employment sites and premises against the current demand, the study suggests there is no significant excess of industrial and warehouse sites/ premises that needed to be released to other uses.

7.3 It is therefore important to continue to protect these employment sites whilst encouraging new business investment and opportunities in order to facilitate renewal and growth. Safeguarding employment land maintains the capacity for a diverse economic base in the city and provides jobs locally, reducing the need to travel.

7.4 The withdrawn Core Strategy sought to introduce more flexibility into the allocation and use of these employment sites. The council recognises that it is necessary to:

- positively encourage refurbishment and upgrade where it modernises the employment floorspace and makes more efficient and effective use of the site/ premises.
- to improve the quality of the employment offer in terms of the types of employment and density of jobs
- to identify a limited number of employment sites for mixed use development where the twin benefits of high quality modern business floorspace and additional housing units can be achieved.

The previous version of the Plan also set out the requirements to be met for enabling development on employment sites.

7.5 The council now considers that an opportunity exists to further clarify this hierarchy of approach to industrial estates/ premises through the allocation or safeguarding of primary employment sites within the City Plan Part 1.

The suitability of sites for mixed use have been assessed on the following criteria:

- The site is vacant or in need of investment and a new scheme would secure good quality modern, flexible employment floorspace;
- The type of employment uses on the site are compatible with residential use; and
- The locality is suitable for residential use.

7.6 The assessment was informed by the ELS2006 qualitative and quantitative assessment and its 2009 update. Through the 2010 SHLAA update further consideration has been given to the role that employment sites can play in meeting housing need and this has informed the identification of opportunities for mixed use development.

Option 1

Clarify a hierarchy through:

a) Identify and protect primary industrial estates and business parks where business, manufacturing and warehouse (B1, B2 and B8) development will be promoted and loss will be resisted. On the basis of the findings of the ELS 2006 and 2009 update, this would include:

- Centenary Industrial Estate
- English Close Industrial Area
- Home Farm Industrial Area
- Hove Technology Park
- Moulsecoomb & Fairways
- Sussex House (including BT depot)
- Woodingdean Business Park
- Hyde Business Park
- Bell Tower Industrial Estate
- Hollingbury Industrial Estate
- Hollingdean Industrial Estate
- Victoria Road Industrial Estate

b) Alongside the strategic employment allocations within Development Area proposals (see Issue 3), identify and allocate other sites where employment-led (residential and employment) mixed use development will be permitted in order to secure good quality modern, flexible employment floorspace. The starting point would be that the existing quantity of employment floorspace should be replaced. On basis of findings of ELS2006 Study and 2009 update:

- Franklin Road Industrial Estate
- School Road, Hove
- Melbourne Street Industrial Area
- Portland Road Trading Estate (including EDF and Martello House)

See Appendix 3 for site assessments.

Advantages:

- More clarity of the intent of the policy through the identification of sites proposed to be protected are clearly set out in the policy and informed by site assessments
- More clarity on the intent of the policy through the identification of sites where employment-led mixed use developments will be allowed, informed by site assessments
- This would provide certainty to developers and the business community on the council's approach to allocation of employment sites and where flexibility has been introduced.
- Accords with the council's aspirations for the city to be an attractive business location.
- Responds to the need to safeguard commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area.
- Clarifies the role some employment sites will play in delivering the council's preferred approach to delivering a local housing target.

Disadvantages:

- Potential for confusion between broad development area aspirations, strategic allocation and primary employment site allocations unless carefully explained.
- Viability of securing replacement of a similar quantity of employment floorspace on some sites.

Option 2

Not to alter the overall proposed approach set out in the previous version of the plan to protecting industrial sites and premises but leave the actual employment site allocations until the City Plan Part 2.

Advantages:

- Accords with PPS12 guidance around the role and content of Core Strategies.
- Would allow more detailed consideration of the approach to allocating sites and the merits of all individual site allocations (not just employment sites) to be considered through the preparation of Part 2 of the document.

Disadvantages:

- Concern that as this option does not identify the actual sites the policy does not provide sufficient clarity and certainty as to the approach to employment land to guide development management.
- Provides a more rapid response to development pressures and changes in situation.
- Would not provide clarity on sites where mixed use development would be allowed.

Option 3

Consider whether further flexibility regarding employment generating permitted uses should be allowed on those estates/ premises outlined in Option 1a).

Advantages:

- Greater flexibility to allow for other employment generating uses (to be defined) other than B1, B2 and B8 could encourage new business investments and opportunities on these sites.
- Approach could recognise a wider definition of appropriate employment uses then covered by traditional land use classifications
- Would be more flexible to respond to changes in the economy/ the emergence of new business sectors.

Disadvantages:

- There is a continued need to safeguard the existing businesses and jobs that are found in the city and provide space for them to grow and remain in the city.
- Unless appropriately defined could allow unsuitable uses on employment sites which could compromise the operation of existing employment uses.

8.0 Issue 6 Maintaining an adequate supply of appropriate, affordable business, manufacturing and warehouse accommodation

8.1 Together with the industrial estates / business parks identified in issue 5, there are smaller industrial units/ workshops dispersed throughout the city which provide affordable accommodation for local businesses. There is often pressure to redevelop these sites/ premises for other uses, particularly residential. This has especially been the case with many older poorer quality industrial buildings in predominantly residential areas. There has also been pressure on these sites for warehousing and trade counter uses to support the local economy's service sector.

8.2 The council considers that a good supply of appropriate employment land should continue to be safeguarded to allow for a broad range of business types to serve the city's needs. However the Housing Delivery Options Paper does include some secondary business, manufacturing and warehouse sites as a potential source of additional supply of housing sites.

Option 1

For all other 'secondary' business, manufacturing and warehouse (B1 b, B1 c, B2 and B8) sites/ premises accommodation will be protected unless redundancy proven.

Advantages:

- Provides landowners/developers with the flexibility for future changes of use from employment land.
- Smaller business/ industrial and warehousing units/ workshops likely to be redeveloped more easily to residential use and this would provide a supply of 'windfall' residential sites.

Disadvantages:

- Without protection these sites/ premises will be lost to the market making it harder for small businesses to find space, inflating the rental values of space that is left making it less affordable to businesses in the city to remain.
- Housing land often has a higher land value, and this has led to developers looking at employment land to provide new housing. The Council's Employment Land Study highlights the importance of protecting land currently in employment use.
- General policy may not be possible without city wide Article 4 Direction if government policy goes through as is consulted upon in April 2011 (the potential relaxation of the planning rules for change of use from business to residential).

Option 2

General policy of protection of secondary business, manufacturing and warehouse (B1 b, B1 c, B2 and B8) sites and premises unless redundancy proven but require reuse for alternative employment generating uses or affordable housing (the proportion to be determined following an update of the Affordable Housing Viability Study).

Advantages

- the city still needs to deliver a greater quantity of higher value of activity for both its resident population and for the wider South East economy, these opportunities will in the main come from the existing portfolio of employment sites.

- Housing need is a pressing issue in the city and seeking a viable proportion of affordable housing on redundant employment sites will meet the council's priorities to bring forward affordable housing.

Disadvantages

- Too prescriptive and does not provide sufficient flexibility for future changes of use from employment land.
- General policy may not be possible without city wide Article 4 Direction if government policy goes through as is consulted upon in April 2011 (the potential relaxation of the planning rules for change of use from business to residential).

Option 3

No general protection of secondary business, manufacturing and warehouse (B1 b, B1 c, B2 and B8) sites and premises.

Advantages

- Provides landowners/developers with the flexibility for future changes of use from employment land.
- Secondary industrial sites/ premises/ workshops easily adapted to residential use and this would provide an additional source of housing supply.
- Would accord with the Government's potential changes to planning rules to allow change of use from business to residential without the need for planning permission.

Disadvantages:

- With the predominance of businesses in the city employing less than 10 people there is a continued demand for smaller floorplate employment floorspace and this will continue.
- Would affect the city's ability to meet its employment target of 6,000 new jobs by 2014 as the business base will stagnate due to the lack of available space.
- With potential less commercial space to meet demand available rental levels would increase, reducing the availability of affordable business space.
- Does not address the need for more commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area
- This further flexibility could lead to an uncoordinated and sizeable loss of valuable and accessibly located employment land.

9.0 Sustainability Appraisal of Options

9.1 A full Sustainability Appraisal (SA) has been undertaken of the employment policy options presented above and is available on the council's website. A summary of the findings and recommendations by issues is provided below:

- Issue 1 - Recognition and support of the city's primary office area; the Sustainability Appraisal found that Option 1 to identify and protect central Brighton as the primary office area had the potential for positive impacts and more certainty than Option 2 and was recommended as the preferred option. The recommendation to secure improved environmental performance of refurbished and upgraded office accommodation could be addressed by links to a city wide sustainable building policy.

- Issue 2 - Accommodating the need for 20,000 sq m additional office floorspace; Option 1 was considered as having more certainty than the other options put forward as the specific sites are named and the relative constraints of sites can be assessed and addressed. There was more potential for positive impacts, the option seemed to be more viable in the current economic climate and may meet local needs by offering a range of premises over a range of sites.
- Issue 3 - Maintaining an adequate supply of appropriate, affordable office accommodation; Option 2 was found to have the potential for stronger positive impacts than the other option in relation to housing, employment, education, health and access objectives. The SA recommended clarity around tests for redundancy which could be addressed through policy wording.
- Issue 4 - More specific mention of strategic employment sites and their roles within Development Areas; Option 2 identifying strategic employment sites within Development Area proposals was found to have the potential for an overall positive impact on a number of SA objectives. The overarching Development Area proposals can address the issues raised in the SA relating to air quality, local priorities including air quality, public realm and townscape improvements and where appropriate coastal flooding risk.
- Issue 5 - An appropriate hierarchy and protection of industrial estates and premises that encourages their refurbishment and upgrade and whether further flexibility should be considered. The SA found there to be more certainty of impacts with Option 1 than Option 2 as sites were named and was found to have more significant positive impacts on employment and education objectives. Option 3 to allow more flexibility of employment uses on safeguarded sites was considered to have positive impacts on SA objectives relating to employment and economic development.
- Issue 6 - Maintaining an adequate supply of appropriate, affordable business, manufacturing and warehouse accommodation; Option 2 was found to have the potential for stronger positive impacts than the other option in relation to housing, employment, education, health and accessibility objectives. The SA recommended clarity around tests for redundancy which could be addressed through policy wording.

The SA recommended mitigation measures for all options which can inform the policy wording.

10.0 Preferred options and summary justification

The Council's preferred approach is to:

- Specifically identify and safeguard Central Brighton as the city's primary office area to accord with the council's aspirations for central Brighton to be a vibrant employment location and respond to the need to safeguard commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area (Issue 1, Option 1).
- Identify and allocate a ranges of sites to accommodate the forecast need for an additional 20,000 sq m of office floorspace within the New England Quarter and London Road Development Area as a more flexible and viable way of bringing forward new office floorspace (Issue 2 Option 1)

- Allocate strategic employment sites within the City Plan and identify their proposed role within the Development Areas to clarify and provide certainty to landowners and developers on the council's preferred approach to securing regeneration, inward investment and high quality modern employment floorspace and, where appropriate employment-led mixed use development (Issue 4 Option 2) .
- Identify a hierarchy of industrial estates/ premises by allocating in the City Plan those sites which will continue to be safeguarded for business, manufacturing and warehouse use and where refurbishment and improvement will be encouraged and also allocating those assessed as suitable for employment-led mixed use development where the twin benefits of high quality of modern business floorspace and additional housing requirements can be achieved (Issue 5 option 1 and 3).
- Safeguard secondary employment sites to ensure a good supply of appropriate employment land available for a broad range of business types to serve the city's needs (Issue 3 option 2 and Issue 6 option 2).

Appendix 1 - Accommodating the need for the 20,000 sq m additional office floorspace - Site Assessments

Redevelopment Opportunities

Site	Vantage Point, Elder Place (including Circus Parade)
Site Area and Description	0.37 Ha 1960s office block with c. 7 stories and basement with retail units at ground floor; Circus Parade retail units and residential above, small public square and small car park to rear. Ownership: Spen Hill Developments
Current Planning policy	Not allocated in Local Plan.
Current Status	Pre-application discussions
Site Assessment	Available - vacant office block, developer in pre-application discussions. Suitable - Good location - fringe of city centre, good public transport Viable - may require mix of uses to enable redevelopment to provide office floorspace
Opportunities	Development opportunities identified through London Road Central SPD: either site on own or wide comprehensive regeneration with adjacent site. 2010 SHLAA indicates potential for housing - 90 units.
Site	Trade Warehousing (Longley Industrial Estate), 4-6 New England Street
Site Area and Description	0.22 Ha. Terrace of low rise light industrial/ trade warehousing in mixed use. Ownership: Spen Hill Developments have long lease on site. BHCC own freehold.
Current Planning policy	Allocated in Local Plan
Current Status	Pre-application discussions
Site Assessment	Available - Relatively modern units each of which around 500 sq m no vacancies; Suitable - Good location - fringe of city centre, good public transport Viable - may require mix of uses to enable redevelopment to provide office floorspace
Opportunities	Development opportunities identified through London Road Central SPD: Part of wider comprehensive redevelopment with Vantage Point above or redevelopment with business units 2010 SHLAA Category 5 site.

Site	Richardson's Scrapyard and Brewers Paint Merchants site, New England Street
Site Area and Description	0.26 Ha Builders merchant and scrap yard Ownership: part owned by BHCC
Current Planning policy	Not allocated in Local Plan
Current Status	
Site Assessment	Available - multiple uses Suitable - Good location - fringe of city centre, good public transport Viable - may require mix of uses to enable redevelopment to provide office floorspace
Opportunities	London Road Central SPD; Employment uses including business floorspace and affordable workspace for creative industries. Residential may be allowed as enabling development. 2010 SHLAA update indicates potential for housing - 65 units and more intensive use of site

Outstanding Planning Commitments, other opportunities

Site	Block J, Brighton Station
Site Area and Description	0.86 Ha. Outstanding development opportunity within New England Quarter Ownership: Square Bay Properties
Current Planning policy	Allocated in Local Plan
Current Status	BH2010/03999 - application for mixed use scheme, 3-4 star hotel, 148 residential units and 2973sqm commercial office space (Class B1), m of office under consideration.
Site Assessment	Available - cleared site Suitable - Good location - city centre, excellent public transport links Viable - viability of office use may require mix of suitable uses and pre-let
Opportunities	Council aspiration for further office development and a mix of suitable uses including residential. Brighton Station Masterplan. 2010 SHLAA indicates potential for 100 units

Site	Block K Brighton Station
Site Area and Description	1.127 Ha Outstanding development opportunity within New England Quarter Ownership: McAleer & Rushie Group Ltd, development for NEQ-QED Ltd
Current Planning policy	Allocated in Local Plan
Current Status	BH2008/01148 five storey office development c. 3,428 sq m, public open space and landscaping scheme was approved April 2009 and s.106 Agreement signed and decision notice issued July 2010.
Site Assessment	Available - cleared site Suitable - Good location - city centre, excellent public transport links Viable - pre-let secured
Opportunities	Appropriate for office development. Agents in advanced negotiations with a local occupier to secure a pre-let for entire building

Site	Blackman Street site (land adjacent to Britannia House)
Site Area and Description	0.11 Ha. Cleared site, (was temporary used as sales office for developers of City Point). Ownership: private (CSMA)
Current Planning policy	Allocated in Local Plan
Current Status	BH2007/02443 retrospective planning permission used for temporary sales office
Site Assessment	Available - Privately owned and ready for development. Being Marketed Suitable - Good location - city centre, excellent public transport links Viable - considered appropriate location for office development.
Opportunities	2010 SHLAA 'call for site' submission indicated being marketed for office and the consideration should be given to mixed use which would not prejudice office development. 2010 SHLAA update - 11 units

Brighton & Hove City Plan Employment Policy Options Paper (October 2011)

Site	Cheapside (south between Blackman Street and Whitecross Street)
Site Area and Description	0.16 Ha. AutoCentre and warehouse units with office and parking. Ownership: BHCC freehold
Current Planning policy	New allocation.
Current Status	
Site Assessment	Available - multiple uses Suitable - Good location - city centre, excellent public transport links Viable - considered appropriate location for office development
Opportunities	Potential for mixed housing and office development. Potential for housing assessed in 2010 SHLAA update - 32 dwelling yield (Category 2 site).

Site	GB Liners Site, Blackman Street
Site Area and Description	0.08ha 1970s metal clad depot warehouse building Ownership: BHCC freehold leased to GB Liners
Current Planning policy	New allocation
Current Status	BH2009/00087: Planning permission was granted in April 2009 for the demolition of the existing B8 depot building on the site and redevelopment to provide a building of 3,327m ² (gross) of flexibly designed B1 floorspace set over five floors.
Site Assessment	Available - requires relocation of current business Suitable - Good location - city centre, excellent public transport links Viable - subject to relocation of current business
Opportunities	Redevelopment of the site to provide uses more appropriate to the city centre employment location to assist with the relocation of GB Liners to a more suitable site to accommodate business retention and expansion.

Site	City College, Pelham Street
Site Area and Description	1.33 Ha Education use - current City College Pelham Street Campus Ownership: City College
Current Planning policy	New allocation
Current Status	BH2008/02376: City College, Pelham Street Campus. Outline planning permission was granted in April 2009 for the redevelopment of the site for a mixed use scheme based around a replacement further education campus.
Site Assessment	Available - current City College Pelham Street Campus would require phased redevelopment Suitable - Good location - city centre, excellent public transport links Viable - funding over commitments nationally by the Learning & Skills Council, further consideration of funding the development required
Opportunities	Further Education "Knowledge Quarter" (as in Pelham Street Knowledge Quarter Planning Brief). However, following funding over commitments nationally by the Learning & Skills Council, further consideration of funding of the development is required.

Appendix 2 More specific mention of strategic employment sites and their roles within Development Areas. Site Assessments

DA2 Brighton Marina
Vision - facilitate the creation of the Brighton Marina and the wider area as a sustainable mixed use district of the city through the generation of a high quality marina environment
Previously Proposed Strategic Allocations
Brighton Marina Inner Harbour
<u>Change Required</u> - revisit amount of development, status of retail shopping centre.
Proposed Additional Employment Site Allocations
Gasholder Site
Area and description: 2 Ha site located on the western side of Marina Way. Consists of cleared southern half, small industrial units (approx. 2,412 sq m) some currently vacant as well as a motor repair shop and gas holders Current use: northern part of the site is currently occupied by the gas holders. Ownership National Grid, northern tip of site by BHCC; southern half of site vacant Planning Status: currently a split allocation in Local Plan (EM1) (southern part of site identified for housing HO1)
Site Assessment: The ELS 2006 identified potential location for the development of light industrial units for small and start-up businesses on the basis of freehold or long leasehold sales. Owner has indicated that removing the infrastructure (gas holders) and remediating the contaminated ground (plus provision of appropriate replacement facilities elsewhere) on northern part of the site is likely to be millions of pounds.
Opportunities:
<ul style="list-style-type: none"> ● Represents a significant development opportunity, in close proximity to Brighton Marina and Black Rock (Brighton Marina PAN 04) ● It is appreciated that due to the decommissioning and remediation costs, a comprehensive approach to the redevelopment of both parts of the site may be required ● Opportunity for c. 4,000 sq m industrial (B1-B2) industrial floorspace ● Allocation should reflect concerns around deliverability given contamination costs and consider an appropriate mix of uses including residential ● 2010 SHLAA indicates category 3 site 84 units southern part of site.

DA3 Lewes Road

Vision - Further develop and enhance the role of Lewes Road as the city's academic corridor (a neighbourhood of knowledge and enterprise focused around the Universities).

Previously Proposed Strategic Allocations

Preston Barracks

Change Required - update policy wording and amounts of development to reflect 2011 Planning Brief and inclusion of university campus sites (Watts and Mithras House sites).

Community Stadium

Change Required - removal of site as strategic allocation and revise amounts of development as development now successfully implemented.

Proposed Additional Employment Site Allocations

Woollards Field, Lewes Road

Area and description: 2.88 Ha site located south-west of the Southern Water offices on the A270 at Falmer. Owned by ESCC.

Current use: vacant former overflow sport pitches associated with schools in Brighton, declared surplus to use in 1990s has not been used for sporting or recreational purposes since that time. It is privately owned and is not accessible to members of the public.

Planning Status: Allocated in the Local Plan (EM2)

BH2010/03259 permission approved January 2011 for the construction of a 1-3 storey archive centre comprising lecture and educational facilities, reading room, conservation laboratories, archivist study areas, offices, cleaning and repair facilities for archives, repository block and refreshment area. Associated energy centre, car, coach and cycle parking, waste and recycling storage, landscaping including public open space and access on part of site (1.98 ha).

Site Assessment: the BH2010/03539 application demonstrates that a substantial part of Woollards Field south (0.9 ha site) could be potentially developed in the future for B1 employment use.

Opportunity:

- Reflect the outstanding commitment of a new historical resource centre - The Keep (BH2010/03259)
- Importance of bringing forward the outstanding opportunity on the remaining part of site for c. 5,000 sq m of office floorspace.

DA4 New England Quarter and London Road

Vision - Proposed location for a new business quarter for the city recognising its fringe location to city centre with excellent transportation link, the successful redevelopment of Brighton Station, the existing creative industries hub, and significant redevelopment opportunities to secure additional new office floorspace to meet identified needs.

Previously Proposed Strategic Allocations

125- 163 Preston Road

Change Required -.

Update amounts of development to reflect the increased role certain sites will play in delivering housing numbers to reflect 2010 SHLAA and emerging Viability Study.

Proposed Additional Strategic Allocation

Identification of sites to accommodate 20,000 sq m of additional office floorspace through redevelopment opportunities and reflecting outstanding commitments for office floorspace

See Appendix 1 for further details

Proposed New Employment Site Allocations

New England House

Site Area and description: 0.34 Ha. Early 1960s industrial building with over 12,000 sq m of lettable space over eight floors. Owned by BHCC.

Current use: multitude of small local businesses

Planning Status: allocated in Local Plan (EM1)

Site Assessment: Although some of the floorspace is currently un-let due to its condition and size, the building has recently seen a significant proportion of its space occupied by businesses within the digital media and creative industries sector. This is due to the competitive rates, flexible terms and the location close to North Laine and the train station. The Council's Cabinet in October 2010 agreed to pursue an option for the refurbishment of the building with shared network, Research & Design and innovation space, with the building continuing to provide affordable and flexible managed space.

Opportunities:

- Deliver its upgrade and refurbishment;
- Reflect importance of premise as a creative industry and digital media hub;
- To ensure workspace remains affordable, appropriate and available for use.

DA5 Edward Street and Eastern Road Area

Vision - Recognises the concentration of major employers in the area both private sector (Amex) and public sector including RSCH and the need to improve the public realm, townscape and sustainable transport corridor.

Previously Proposed Strategic Allocations

Royal Sussex County Hospital

Change Required - update amounts of development and need for transport feasibility study

Edward Street Quarter

Change Required - update amounts of additional office development to reflect SHLAA updates and emerging viability study.

Proposed New Employment Site Allocations

Circus Street site

Site Area and description: 0.75 ha dilapidated former municipal market building, located close to the heart of the city centre within an existing mixed use area.

Current use: vacant (building is used for limited short-term uses)

Planning Status: currently allocated in Local Plan

Site Assessment: The city council and the University of Brighton have been working in partnership towards the regeneration of the former Circus Street Municipal Market site. The city council is looking to achieve its economic development objectives of providing more employment floorspace, and housing objectives of increasing the supply of affordable units, as well as ensuring that the site is developed to the very highest standards of urban design and sustainability. Circus Street Supplementary Planning Document (SPD) March 2006.

Opportunities:

- Potential of site to deliver education uses, creative industries and student housing
- Ensuring that the site is developed to the very highest standards of urban design and sustainability
- Financially viable and deliverable redevelopment which secures regeneration benefits to the local community.

Freshfield Road Business Park

Site Area and description: 3.13 Ha two storey buildings dates from the early 1980s, although a number of units have been extensively re-furnished recently. Estates provide a mix of trade counter and industrial premises, although the proportion of trade counter now dominates. Freehold BHCC long lease to Hargreaves.

Current use: Jewson, Royal Mail and local businesses

Planning Status: allocated in Local Plan

Site Assessment: long leaseholder (Hargreaves Property Investments Ltd) entered into a rolling programme of refurbishment and re-development, estate is economically viable although most of the upgrading has been to provide trade counter unit.

Opportunities:

- Potential to consider the long-term comprehensive redevelopment of the site in a relatively central and accessible location which is regarded as inefficient in its current employment density and quality
- May need to consider whether there is potential for part of this site to be released for housing. 2010 SHLAA indicated Category 4 site potential 117 units.

DA6 Hove Station Area

Vision - recognises the longer-term regeneration opportunities for Hove Station area to create a sustainable, high quality employment-led mixed use area. The priority is to continue to protect and enhance the existing employment floorspace provision in the area in order to help maintain and strengthen the local economy. Opportunities for the area to deliver significant growth in relation to employment, although these are likely to be in the latter part of the plan period (post 2016).

Previously Proposed Strategic Allocations

n/a

Change Required -update amount of development to reflect 2010 SHLAA

Proposed Employment Site Allocations

Conway Street Industrial Area

Area and Description: 3.44 Ha with the exception of the refurbished Agora office building, poor quality buildings and bus depot. Mixed ownership.

Current use: Custom Pharmaceuticals, Bus Company. Various in Agora including training uses.

Planning Status: currently allocated in Local Plan

Site Assessment: ELS 2006: Buildings offer economical accommodation for local companies however a number of buildings are nearing the end of their functional lives, and the site as a whole offers scope for employment space redevelopment.

Opportunities:

- Comprehensive, employment led redevelopment, may require some relocation of uses
- Residential. 2010 SHLAA suggested category 3 site 125 units.
- Higher density higher value job opportunities
- Townscape and public realm improvements

Newtown Road Industrial Area

Area and Description: 2.6 Ha 14 mainly industrial buildings, majority relatively modern and fit for purpose.

Current use: variety of local businesses and variety of owners

Planning status: currently allocated in Local Plan (EM1)

BH2010/03937- Temporary part change of use for a period of 10 years from General Industrial (B2) to Climbing Wall Centre (D2) approved March 2011.

Site Assessment

ELS2006 and update 2009 - Southern side of Newtown Road relatively modern estate well suited to local business. No potential in short-medium term. Redevelopment opportunity on site at junction with Goldstone Lane (56 Newtown Road). However 2008 DV Report indicated previous permission for 3,300 sq m office redevelopment (BH2004/02582/FP) not viable. A reduced office scheme relying on enabling residential development (24 units) was considered viable.

Opportunities

- Comprehensive, employment led redevelopment
- Higher density, higher value job opportunities
- Townscape and public realm improvements

Proposed New Site Allocations

Goldstone Road Retail Park

Area and description: 2.17 ha former Goldstone Ground, out of town retail units with large area of car parking fronting the site. Private ownership.

Current use: Retail warehouses (JJB Sports, Toys R Us, Comet, DFS)

Planning Status:

Site Assessment: under-utilised site, single storey retail sheds, excessive parking. Poor public realm and lack of street frontage.

Opportunities:

- Comprehensive redevelopment of site with residential above retail and some employment use
- Attractive location opposite Hove Park close to City Park.
- Like for like retention only of retail floorspace

Sackville Trading Estate

Area and description: 1.8 Ha 1980s purpose built industrial estate east side of Sackville Road which contains a number of small scale buildings, which comprise a mix of employment, trade counter and restricted retail uses.

Ownership: Parkridge Developments

Current use: mixed including Halfords and Rayners

Planning Status: Planning permission granted March 2010 (BH2009/00761) for a comprehensive development providing a mix of uses including: A1, A2-A5 (8,131 sq m), residential apartments (92), offices (5,287sq m).

Site Assessment: The site currently contains a number of small scale buildings; 1980s purpose built industrial units, good occupancy and currently approximately c. 5,400 sq m of B use class space accommodated on the site with a mix of light industrial, trade counter and warehousing. Could make more efficient use of the site and improved public realm and public transport improvements.

Opportunities:

- Redevelopment opportunity could increase the development capacity of under-utilised site.
- Like for like retention only of retail floorspace
- Townscape and public realm improvements
- Residential uses as part of employment-led mixed use development

DA7 Shoreham Harbour

Vision - support the long term regeneration of Shoreham Harbour and immediately surrounding areas. The plans for the Harbour will deliver the regeneration objectives of addressing housing need, improving the quality, variety and availability of employment and training opportunities as well as raising the quality of the waterfront environment for the benefit of local communities and visitors. The plans will also help to implement the adopted Shoreham Port Masterplan, supporting a thriving, modern, consolidated Port.

Previously Proposed Strategic Allocations

n/a

Change Required: reflect the findings of Capacity and Viability Studies and Shoreham Port Masterplan.

Proposed Employment Site Allocations

South Portslade Industrial Area

Area and Description: 5.4 ha. A large area of relatively secondary offices, workshops, light industrial and non B uses north of Shoreham Harbour.

Current use: a wide range of occupiers with no one dominant employer and a wide range of freehold owners ranging from owner occupiers, small investors and property companies

Planning Status: various

Site Assessment: ELS 2006 and 2009 update: poorly located, remains suitable for small and local businesses requiring economical premises. Unless wholesale redevelopment was envisaged and difficult due to fragmented ownership, any scheme would be limited to small workshops and industrial units. Rental levels and yields unlikely to be particularly strong.

Opportunities:

- Within the identified North Quayside / South Portslade character area, there is an opportunity for employment-led redevelopment of existing lower grade employment areas
- Potential for additional new employment floorspace (focussing on sectors which will provide higher wages and improved career prospects for local people) and to improve the business environment and support the needs of existing employers.
- Townscape and public realm improvements

Appendix 3 Appropriate hierarchy and protection of industrial estates and premises. Site Assessments

Site	Centenary Industrial Estate
Site Area and Description	1.14 Ha Relatively modern estate to north of city centre comprising a small industrial development with unit sizes ranging from 300 sq m to 1,000 sq m. Remaining opportunity former Securicor premises. Variety of local businesses in mixed ownership
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	English Close Industrial Area, Old Shoreham Road
Site Area and Description	1.57 Ha Western part of estate recently redeveloped. Mix of trade counter operations and industrial units in remainder perfectly adequate for their uses. Mix of local businesses in mixed ownerships
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Home Farm Industrial Estate
Site Area and Description	2.5 ha Five substantial two-storey modern business units constructed 1990s. No development opportunities as a modern fully developed business estate. BHCC freehold. Occupiers: Covers Timber and Builders Merchants, EDOMVM and Forfars Bakery
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Brighton & Hove City Plan Employment Policy Options Paper (October 2011)

Site	Hove Technology Park, St Joseph Close, Old Shoreham Road
Site Area and Description	4.6 ha St Josephs Close scheme completed to provide a number of modern industrial and business units and Hove Technology Centre. Potential for redevelopment of the northern end and the west which should be economically feasible. Occupier demand should be good. Southern end of site owned by BHCC but subject to long lease over part. Key occupiers: British Red Cross, SL Group
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Moulsecoomb & Fairways Industrial Estate
Site Area and Description	3.5 ha Reasonably good location, Fairway Trading Estate is modern fully occupied estate that does not require redevelopment. Site split by church. Potential for redevelopment of the western side of Westergate House for small business users. Mixed ownership including BHCC. Key occupiers: Kingspan, Allen West Electrical
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use.

Site	Sussex House Industrial Area (including BT depot)
Site Area and Description	1.86 ha Estate comprises a mix of modern and 20 year old buildings, suitable for employment uses. Fragmented ownership. Key occupiers include BT
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Woodingdean Business Park
Site Area and Description	3.9 Ha Programme of redevelopment since 2000. 3 phases now completed providing mix of employment uses. Planning consent for Phase 4 comprising 6 B1 light industrial units granted August 2008. Remainder of site being developed when end users identified. BHCC long leasehold interest St Modwen Developments. Key Occupiers: various local businesses
Current Planning policy	Allocated site (EM1)
Current Status	BH2010/01454 - development of 3,479 sq m industrial and storage buildings with associated offices and a wind turbine together with provision for access, servicing, parking and landscaping approved August 2010.
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	The Hyde Business Park
Site Area and Description	1960s industrial estate on the fringe of the eastern side of Bevendean residential area, poor road access; appearance improved through SRB; largely let. Ownership: BHCC freehold, long ground leases.
Current Planning policy	Allocated Site (EM1)
Current Status	
Site Assessment	Although long term suitability (age and location) for employment uses raised in ELS 2006 and 2009 update council consider estate continues to offer local job opportunities as indicated by low vacancy levels.

Site	Bell Tower Industrial Estate
Site Area and Description	1.5 Ha 11 small industrial units offer good modern, small industrial and business units which are eminently suitable for local business. Ownership: various leaseholds.
Current Planning policy	Allocated Site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Brighton & Hove City Plan Employment Policy Options Paper (October 2011)

Site	Hollingbury Industrial Estate
Site Area and Description	9.93 Ha One of city's premier industrial locations due to proximity to A27. Estate has been subject to on-going redevelopment and refurbishment (e.g. Crowhurst Corner, Exion 27) Ownership: BHCC freehold. Let on long ground-leases. Key occupiers: Sussex police, Newsquest Sussex Ltd
Current Planning policy	Allocated Site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Hollingdean Industrial Estate
Site Area and Description	3.9 Ha Reasonable proximity to A270 but access is poor. Waste transfer station now completed, remaining redevelopment opportunity is former meat market units. Ageing accommodation housing City Depot. Ownership: BHCC, Key occupiers: City Clean depot, Veolia MRF/transfer station
Current Planning policy	Allocated Site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Victoria Road Industrial Estate
Site Area and Description	3.31 Ha Good access, area bisected by Victoria Road; land to the north is dominated by Chandlers BMW; redevelopment opportunity to the south to improve access/ public realm. Ownership: Endeavour Group
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Those sites assessed as suitable for employment-led mixed use development:

Site	Franklin Road Industrial Estate, Norway Street
Site Area and Description	0.56 Ha 4 ageing industrial units within a residential area; with constrained access. Majority of site (0.52 ha) freehold owned by Infinity Food Cooperative Ltd but operate a split site. Occupiers: BB Printing (Palmer & Harvey McLane Ltd) at 67a Norway Street.
Current Planning policy	Allocated site (EM1)
Current Status	BH2010/00637 Application to extend time limit for implementation of previous approval (BH2007/01655) for a replacement warehouse on southern part of site including mezzanine floor and covered loading bay approved May 2010
Site Assessment	Currently in use and potential for local business to refurbish units but their long term expansion on site is constrained. In the event of the current businesses relocating, the ELS2006 considered the units would not be re-lettable and considered the site not suitable for employment use and site more suited to residential use, poor access and surrounded by residential. SHLAA 2010 Category 5 site.

Site	School Road Industrial Area, Hove
Site Area and Description	1.22 Ha Estate comprises a mix of office and light industrial /workshop units and non B uses, the majority of which are more than 30 years old. Lack of parking for larger units but 1970s Rayford House refurbished to provide reasonably good office accommodation. Cross Stone Urban Regeneration (except Rayford House) Occupiers: Westows soft play area, Tyre Express, Neils Steels Ltd, Cliffords, Written Word, Rayford House Offices
Current Planning policy	Allocated in Local Plan (EM1)
Current Status	
Site Assessment	Given the high site coverage on most of the site, any redevelopment would be likely to mean a reduction on floor space to allow for modern parking and loading requirements. 2010 SHLAA Category 3 site 46 units.

Brighton & Hove City Plan Employment Policy Options Paper (October 2011)

Site	Melbourne Street Industrial Area
Site Area and Description	0.56 Ha. Estate is dominated by Enterprise Point, a multi storey building but also includes strip of ageing workshops. Enterprise Point owned by Cross Stone Urban Regeneration. Occupiers:
Current Planning policy	Allocated in Local Plan (EM1)
Current Status	
Site Assessment	Melbourne Street off Lewes Road is within a largely residential area with poor access to site although local public transport links along Lewes Road are good. Enterprise Point is an ageing multi-storey building let to a multitude of users including non B use class users. Would not be economically viable to redevelop for existing uses; building may have potential for redevelopment but only if high density and possibly mixed use. Remainder of site - small aged workshops with limited parking. Future redevelopment of these workshops would not be feasible for modern workshop/light industrial uses. Alternative uses (affordable housing) might be more appropriate. 2010 SHLAA Category 5 residential site

Site	EDF/ Portland Trading Estate
Site Area and Description	3.2 Ha Estate parallel to Old Shoreham Road, 15 units including a terrace of modern units, Martello House and a large three storey office occupied by EDF energy on western half of site.
Current Planning policy	Allocated in Local Plan (EM1)
Current Status	
Site Assessment	Redevelopment opportunity for more effective use of site on western half of site if no longer required for medium sized industrial and business units opportunity. SHLAA 2010 category 3 site potential 151 units.

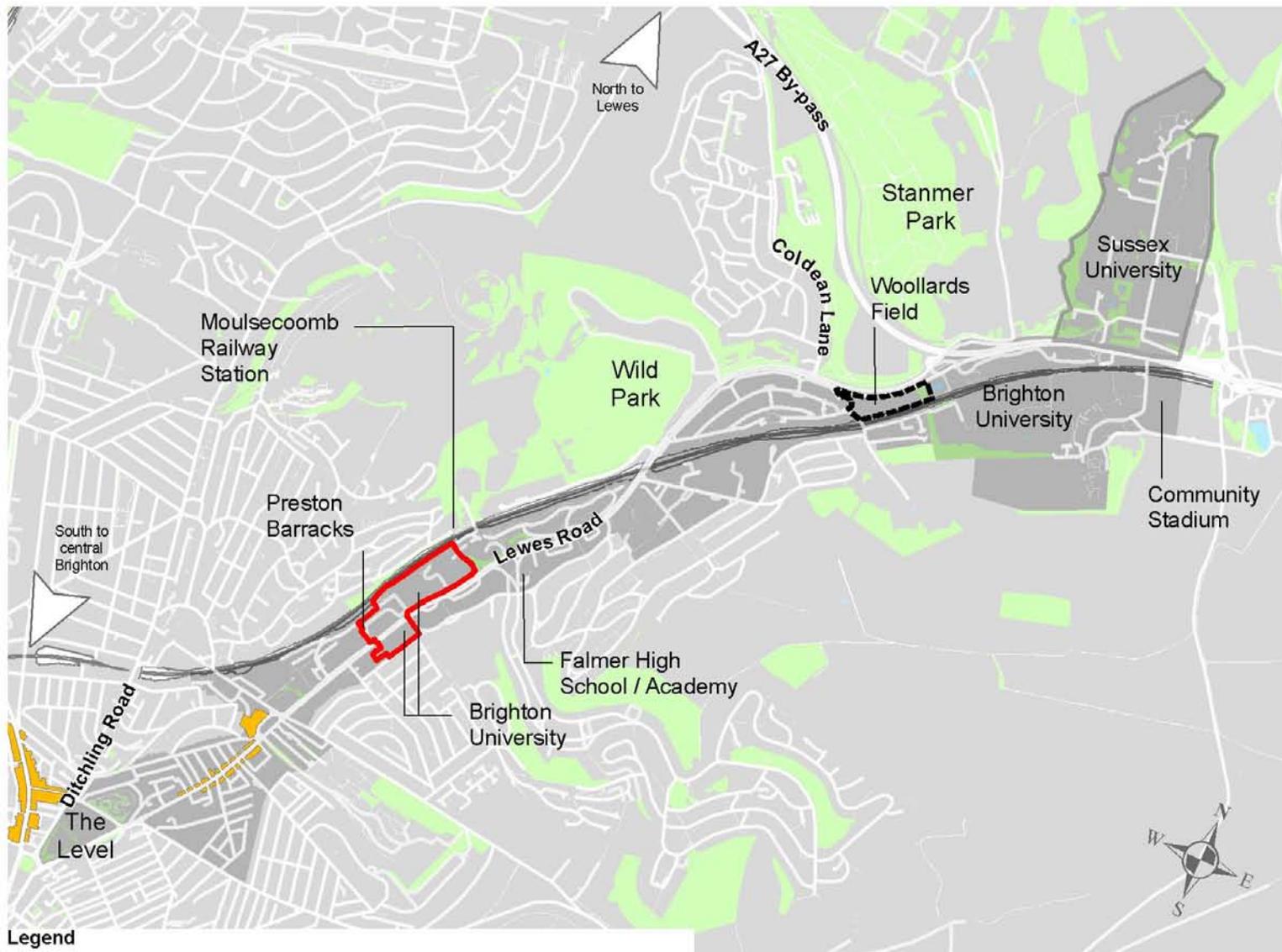
DA2 Brighton Marina Development Area - proposed Strategic Employment Allocation (Appendix 2)



Legend

- Extent of area
- Strategic Allocation as identified in Core Strategy
- Proposed Strategic Employment Allocation

DA3 Lewes Road Development Area - proposed Strategic Employment Allocation (Appendix 2)



- Extent of Area
- Strategic Allocation as identified in Core Strategy (amended boundary)
- Proposed Strategic Employment Allocation
- Shopping
- Key sites in area

DA4 New England Quarter and London Road Development Area - proposed Strategic Employment Allocations and preferred new office allocations (Appendix 1 and 2)

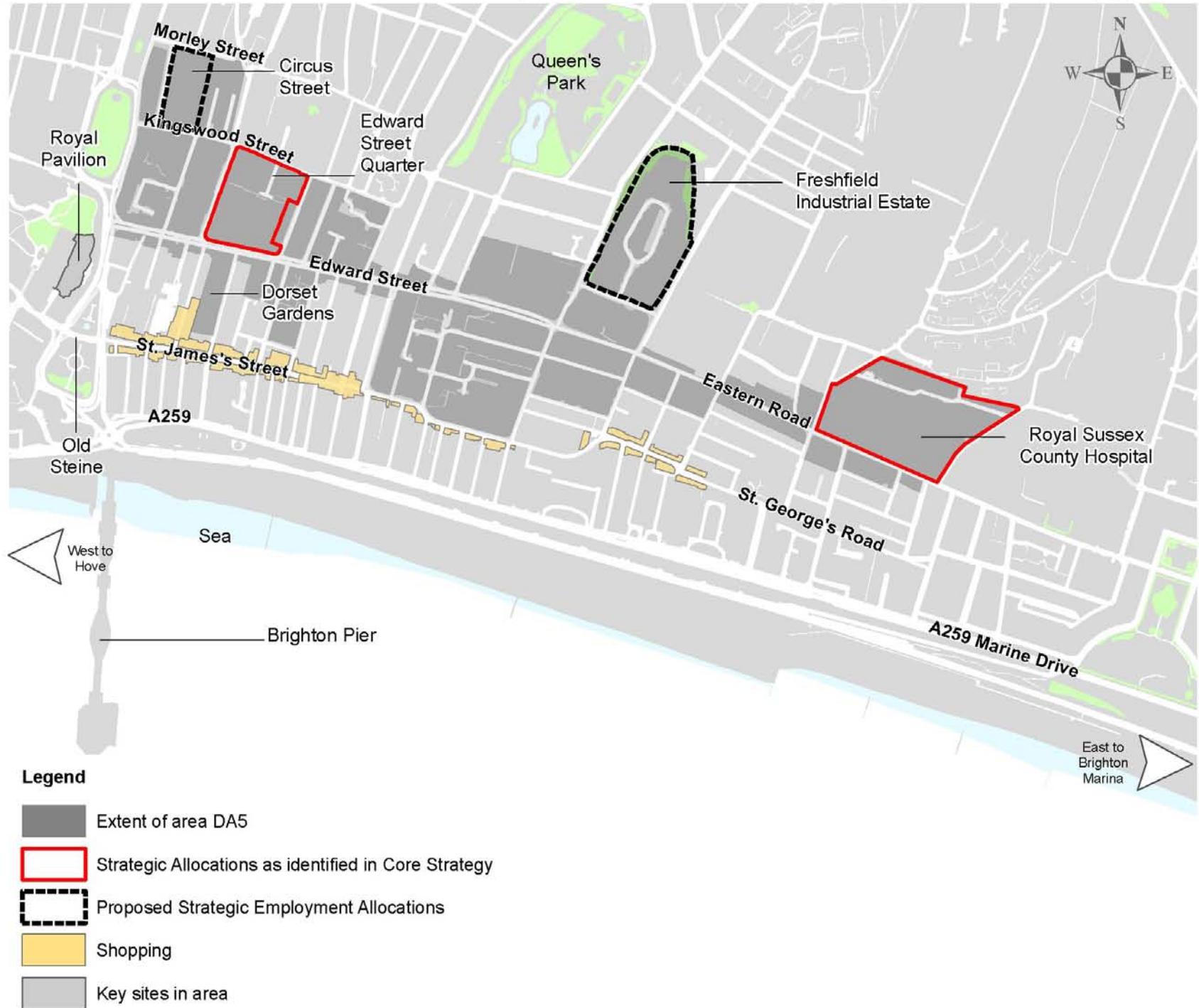


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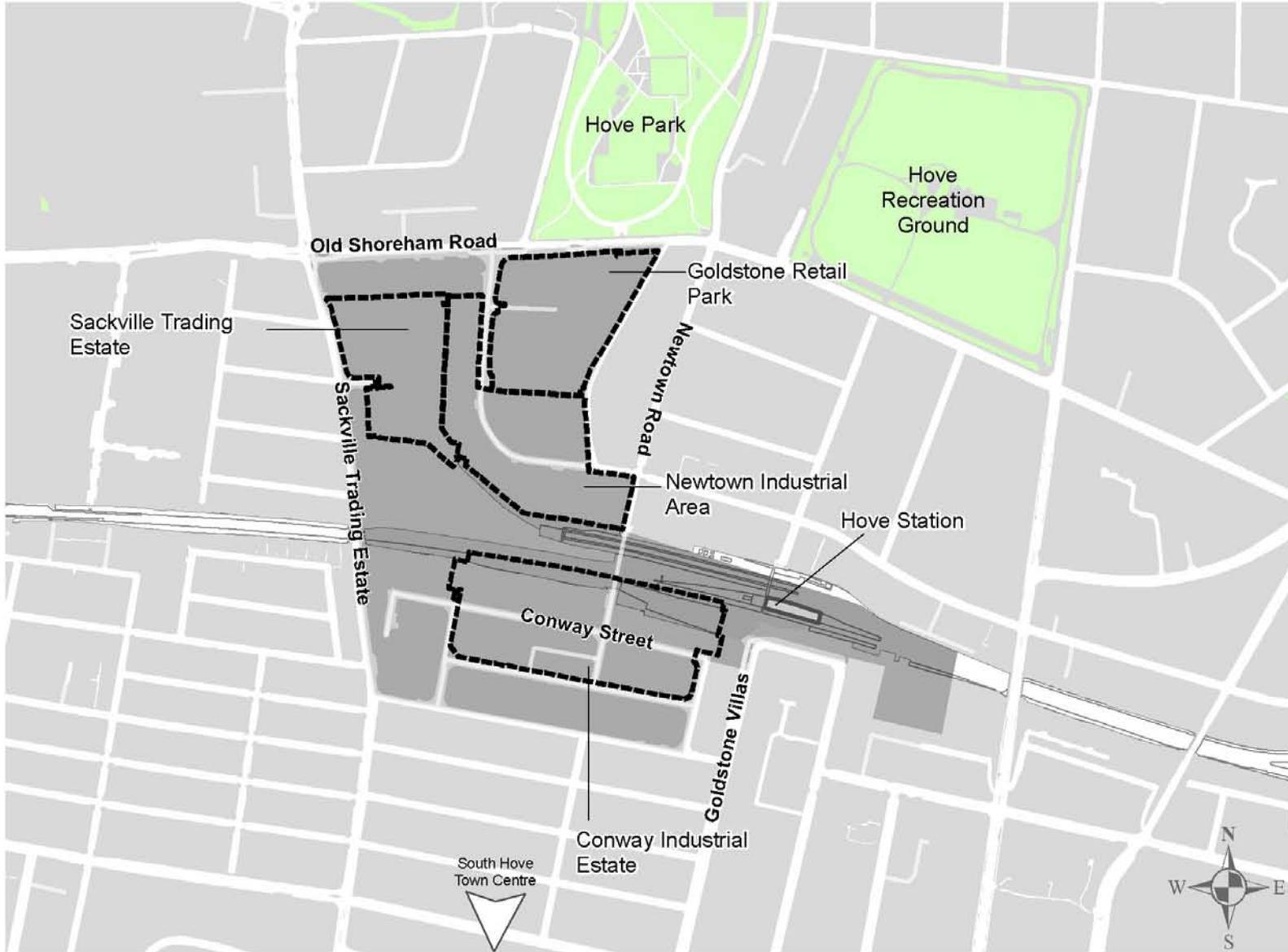
- Extent of Area DA4
- Strategic Allocation as identified on Core Strategy
- Proposed Strategic Employment Allocation
- Preferred new office allocations & key sites
- Shopping

Site No.	Site Name
01	Vantage Point, Elder Place
02	Trade Warehousing, New England Street
03	Richardson Scrapyard & Brewers Paint Merchants, New England Street
04	Block J, Brighton Station
05	Block K, Brighton Station
06	Blackman Street site
07	GB Liners Site
08	Cheapside
09	City College

DA5 Eastern Road and Edward Street Area Development Area - proposed Strategic Employment Allocations (Appendix 2)



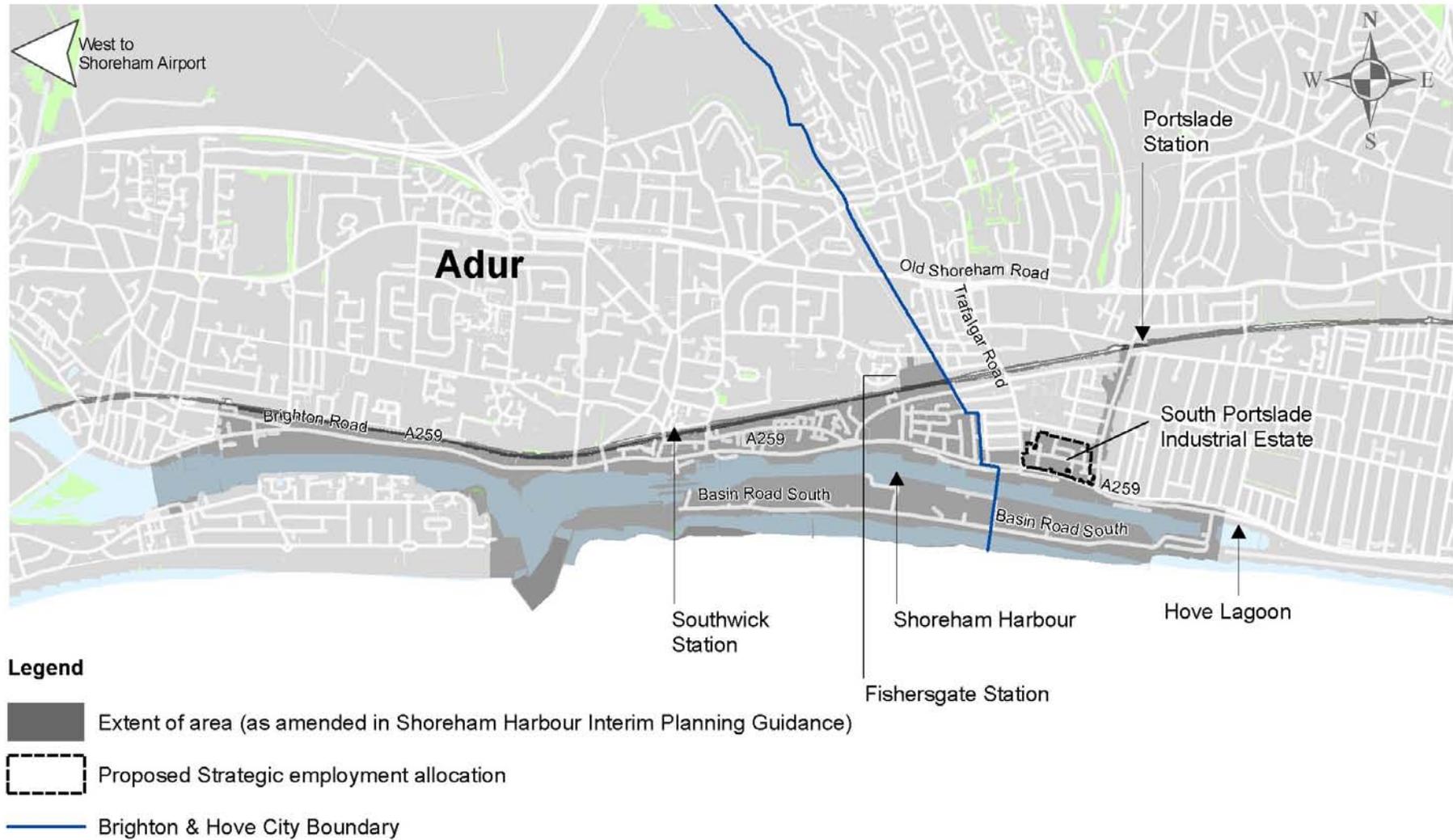
DA6 Hove Station Area Development Area - proposed strategic employment allocations (Appendix 2)



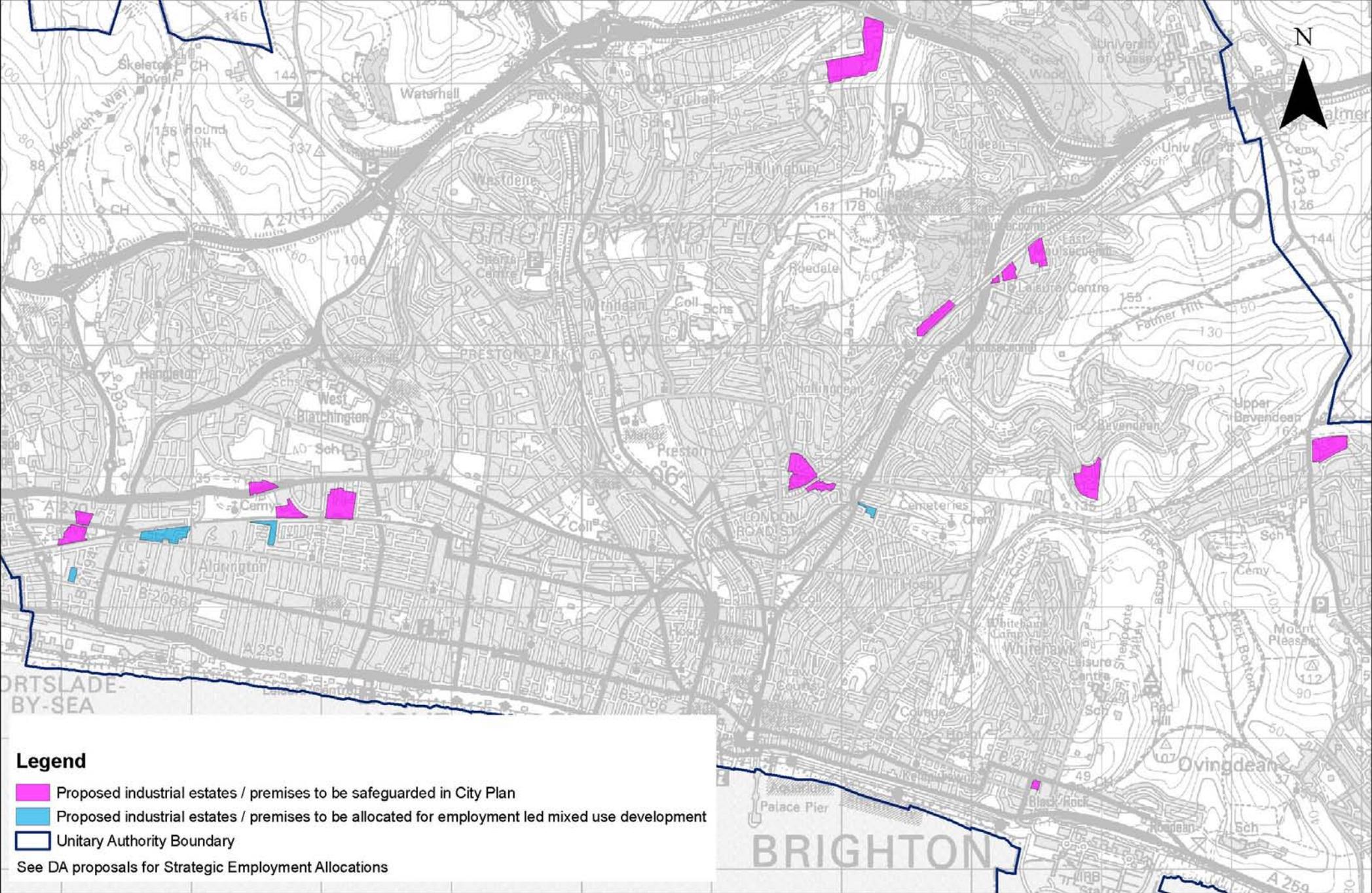
Legend

-  Extent of area
-  Key sites in area
-  Proposed Strategic Employment Allocations

DA7 Shoreham Harbour Area Development Area - proposed strategic employment allocation (Appendix 2)



Proposed Hierarchy of industrial estates / premises (Appendix 3)





Brighton & Hove
City Council