

CP3 Employment Land

Sufficient employment sites and premises will be safeguarded in order to meet the needs of the city to 2030 to support job creation, the needs of modern business and the attractiveness of the city as a business location. This will be achieved through:

1. Strategic proposals and allocations for B Use Class employment floorspace as set out in DA2 Brighton Marina, DA3 Lewes Road, DA4 New England Quarter and London Road, DA5 Edward Street and Eastern Road Area, DA6 Hove Station, DA7 Toad's Hole Valley and DA8 Shoreham Harbour (including South Portslade) and at Patcham Court Farm.

2. The identification of Central Brighton as the city's prime office location where B1a offices will be protected (see SA2 Central Brighton). The council will support proposals for the upgrade and refurbishment of existing office accommodation so that they meet modern standards required by business; are more resource efficient and improve the environment and townscape of the site or premises.

3. Protection of the following primary industrial estates and business parks for business, manufacturing and warehouse (B1, B2 and B8) use:
Centenary Industrial Estate
English Close Industrial Area, Old Shoreham Road
Home Farm Industrial Area
Hove Technology Park, St Josephs Close, Old Shoreham Road
Moulsecomb & Fairways Industrial Estate
Sussex House (including BT depot)
Woodingdean Business Park
Hyde Business Park, Bevendean
Bell Tower Industrial Estate
Hollingbury Industrial Estate
Hollingdean Industrial Estate
Victoria Road Industrial Estate
Newtown Road Industrial Estate

The council will support proposals for the upgrade and refurbishment of these estates and premises so that they meet modern standards required by business, are more resource efficient and improve the environment or townscape of the site or premises.

Sui generis uses, including waste management facilities, appropriate in nature to an industrial estate location will also be acceptable, provided that they generate employment which is quantitatively and qualitatively comparable to uses within B1- B8 Use Classes¹⁵⁹; do not harm the

¹⁵⁹ Employment generation is compared with average employment densities as set out in Table 3 of the HCA/Offpat Employment Densities Guide, 2010 or subsequent updates.

continuation of existing uses within those Classes and comply with other City Plan policies and for waste management facilities the Waste and Minerals Plan.

4. In order to secure good quality modern, flexible employment floorspace the council will allow employment-led (residential and employment) mixed use development on the following employment sites:

Franklin Road Industrial Estate

School Road, Hove

Melbourne Street Industrial Area

Portland Road Trading Estate (including EDF and Martello House)

Land North of Newtown Road

There should be no net loss in employment floorspace unless this can be justified. Paragraph 4.36 sets out the factors that will be taken into consideration.

5. Loss of unallocated sites or premises in, or whose last use was, employment use (Use Classes B1-B8) will only be permitted where the site or premises can be demonstrated to be redundant and incapable of meeting the needs of alternative employment uses (Use Classes B1-B8). Where loss is permitted the priority for re-use will be for alternative employment generating uses or housing (in accordance with CP20 Affordable Housing).

6. Preparing Part 2 of the City Plan to allocate additional employment sites and mixed use allocations to help ensure employment land delivery is maintained over the plan period.

Supporting Text

4.28 A number of recent studies¹⁶⁰ have identified the need for new business space to meet the needs of businesses currently located in the city and to attract businesses considering Brighton as a business location to allow the city to grow as an economic base for the wider economic area.

Employment Land Requirements

4.29. The Employment Land Study Review 2012 recommended that the City Plan be guided by forecast growth requirements of 112,240 sq m of office floorspace (B1a, B1b) to 2030 and 43,430 sq m of industrial floorspace (B1c, B2 and B8) over the plan period. To ensure that there are sufficient employment sites and premises to meet this forecast requirement and to facilitate economic growth, Development Area proposals identify strategic allocations to bring forward new high quality employment floorspace (DA2-DA8).

¹⁶⁰ Employment Land Study Review 2012, City Employment and Skills Plan 2011- 14, the Business Retention and Inward Investment Strategy (2009), and the Creative Industries Workspace Study (2007)

4.30 The table below summarises how the employment floorspace requirements will be met in Brighton & Hove through the Development Area proposals. Reflecting the city's role as a regional employment centre, the forecast figures indicate positive employment growth over the plan period. Compared with previous employment land studies¹⁶¹ this includes a positive requirement for industrial floorspace. Opportunities to increase the industrial floorspace capacity in allocations identified for industrial activities have been considered alongside whether opportunities exist for industrial floorspace to be brought forward on other strategic allocations; however this does not address all the forecast requirements. In terms of meeting office needs, the priority is to manage a greater delivery of office floorspace in the city; particularly in Central Brighton but also the phasing of supply in other development areas over the plan period. The Employment Land Supply Trajectory 2013 indicates the potential delivery of new employment floorspace over the short, medium and long-term. Opportunities for additional B use class employment / mixed use allocations to meet outstanding requirements will be addressed through the City Plan Part 2 and through a coordinated partnership approach with neighbouring authorities and the Local Enterprise Partnership. Upgrading and renewal of the City's existing office and industrial stock will also be important to ensure that this space is better utilised, remains competitive and attractive to the market. As CP2 indicates there is also a need to deliver small scale, managed and affordable works space to encourage and retain indigenous business growth within the city.

Table 4 City Plan Employment Floorspace Provision

Employment Floorspace Requirements¹⁶² and Supply (sq m)	
B1a, B1b Office Requirements	112,240
DA3 Lewes Road	15,600
DA4 London Road and New England Street	20,000
DA5 Eastern Road and Edward Street	18,200 – 23,200
DA6 Hove Station	1,000 ¹⁶³
DA7 Toad's Hole Valley	25,000
Patcham Court Farm	6,500
Extant Planning Permission (not included within DA supply figures)	4,757
Total:	91,000 - 96,000 (rounded)
B1c, B2, B8 Industrial	43,430

¹⁶¹ Employment Land Study Review 2006 and update 2009.

¹⁶² Employment Land Study Review 2012 based on job-growth scenario of demand for B class employment space in Brighton & Hove to 2030.

¹⁶³ May not result in a total net gain in employment floorspace within DA6 area due to potential loss of employment space within the Conway Street Industrial Area.

Requirements	
DA2 Brighton Marina	2,000
DA7 Toad's Hole Valley	¹⁶⁴
DA8 Shoreham Harbour	7,500 ¹⁶⁵
Total:	9,500

4.31 In light of the Employment Land Study Review 2012 identifying a qualitative and quantitative need for additional employment land over the plan period it is important that the strategic allocations set out in the Development Areas bring forward high quality employment floorspace as indicated in Table 4 to meet the council's priorities regarding high quality job creation and to support its growth potential over the next 20 years. The Employment Land Supply Trajectory indicates the need for close monitoring of the office developments identified to come forward in 2014-2019 to ensure they are delivered. However, it is also important to allow for reasonable flexibility, in the short term to promote successful regeneration and enable viable schemes to be delivered. Therefore proposals which bring forward employment floorspace less than proposed on sites identified in Table 4 will be considered, taking into account whether:

1. There is demonstrable benefit for early redevelopment and clear commercial and financial viability evidence that the figures in Table 4 are unlikely to be delivered within the next 5 years;
2. Allowing a different scale or mix of development will secure particularly strong planning benefits;
3. It is appropriate in light of ongoing monitoring of delivery of new employment floorspace against the 2013 Employment Land Supply Trajectory and subsequent updates.

Industrial Estates and Premises

4.32 The Employment Land Study Review 2012 assessed the city's stock of industrial estates/ business parks for their suitability for continued protection for employment use. The study found that these established areas remain popular, as demonstrated by high occupancy and low vacancy levels. With limited spare capacity in existing industrial floorspace supply 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.

4.33. Better utilisation of space on these estates could be achieved by wholesale redevelopment opportunities/ the gradual redevelopment of individual plots (whereby one large older unit is redeveloped for modern small

¹⁶⁴ Potential for B1a, B1b employment floorspace to be substituted by B1c light industrial floorspace subject to appropriate masterplanning.

¹⁶⁵ This figure also includes B1a as part of the mix of employment uses ongoing masterplan work indicates potential capacity for net additional floorspace within Aldrington Basin, although this will need to be offset against potential floorspace losses associated with the redevelopment of South Portslade Industrial Estate.

units) or the sub-division of larger units. The council will consider how it can use its ownership of some these estates to help facilitate this and also continue to explore different funding sources to enable improvement works. The council will support proposals which:

- refurbish and upgrade the employment floorspace;
- makes more efficient and effective use of the site/premises delivering new floor space;
- delivers significant environmental improvements in terms of the public realm and landscaping of industrial estates and premises;
- improves the quality of the employment offer in terms of the type of employment and density of jobs, and;
- improves the environmental performance of buildings including improvements that will bring about reductions in water or energy consumption and improve resource efficiency.

4.34 These industrial estates/ premises are also considered suitable for certain “sui generis” uses, that is, those with industrial characteristics which are not included within the Use Classes Order. For example, car breaking, or metal recycling which could potentially harm residential amenity are thus likely to be considered most suited to an industrial estate. With modern design and operation techniques, waste management facilities can increasingly be accommodated in general industrial areas as a B2 use¹⁶⁶. Whether or not a new sui generis use is judged to be acceptable will be considered against the comparability and the extent of the employment it would create and the impact of the use on existing employment uses. A sui generis use would not be acceptable, for example, if it harmed the continuation of the employment uses which the policy protects. Similarly new uses should not be introduced into an industrial estate/ premise that would preclude industrial and/or warehousing type uses.

Employment-Led Mixed Use Sites

4.35 The council has identified at part four of the policy, five employment sites suitable for employment led mixed use (residential and employment) development where the twin benefits of high quality modern business floorspace and additional housing units can be achieved through a more effective and efficient use of the sites. The starting position is that there should be no net loss of employment floorspace.

4.36 In considering proposals where a net loss of employment floorspace is being proposed the council will take into consideration the following factors:

- Site constraints (current site coverage and opportunities for more effective and efficient use of the site)
- The need for environmental and townscape improvements
- Access arrangements (improved access/circulation space).
- Safeguarding the amenity of surrounding users and occupiers

¹⁶⁶ See Policy WMP 7 of the Waste and Minerals Plan for East Sussex, South Downs and Brighton & Hove, adopted February 2013.

- The quality of the employment offer in terms of the type of employment and density of jobs.
- Viability

Developments will need to be carefully designed and managed to ensure that residential and other occupiers of the sites will have an appropriate level of amenity. An appropriate mix of housing and provision of affordable housing will be required to comply with CP19 Housing Mix and CP20 Affordable Housing.

Safeguarding Employment Sites

4.37 Alongside Central Brighton as the primary office location where existing office accommodation will be protected (SA2), office accommodation can also be found in clusters elsewhere in the city (such as at City Park and along Preston Road) and scattered across the city. This office accommodation can be found within older purpose built buildings or converted period buildings, upper floor accommodation above shops, mews or modern flexible managed office space/ business centres. In the context of the delivery challenges for new office space in the short term, and the quantitative shortfall of supply a test of redundancy is required.

4.38 Together with the primary industrial estates / business parks identified in the policy, 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. In the context of the tight industrial market and quantitative shortfall of supply a test of redundancy is required.

4.39 Redundancy and unsuitability for modern employment uses of unallocated sites or premises in employment use (Use Classes B1-B8) will be determined by considering the following criteria:

- a) location of the site;
- b) quality of the buildings;
- c) site or floor layout;
- d) accessibility;
- e) proximity to public transport/ trunk routes;
- f) other uses in the neighbourhood
- g) cost of demolition/ refurbishment sets against its future value for employment uses;
- h) the length of time the site has been vacant
- i) documented evidence of the marketing strategy adopted, particularly whether it has been marketed at a price that reflects local market prices and attempts to make the building attractive to different business or employment uses (the length of marketing will need to reflect the size and nature of the site or premise and therefore whilst a year is considered a

reasonable marketing period for small sites/ premises a longer period may be required for larger sites/ premises).

j) for office uses the prevailing vacancy rate for the size and type of office in Brighton & Hove should also be considered;

k) for an office building whether change of use is the only practicable way of preserving a building of architectural or historic interest.

4.40 Alternative employment generating uses are any uses that generate employment but are not classified as an employment use (uses falling outside the Use Class B1- B8) including educational teaching space and health facilities. This excludes retail or leisure uses unless they comply with the tests of national planning policy.