

SDNPA Brooks Road Planning Brief Consultation:

Part One: SDNPA Introductory Statement: -

“A draft planning has been prepared for the Brooks Road area of central Lewes. Much of the Brooks Road area is protected as a principal employment site under Policy SD35 of the South Downs Local Plan. This is the highest level of protection by the Local Plan for employment sites.”

“The supporting text for Policy HC4: The Working Town of Lewes Neighbourhood Plan is relevant to the vision for the Planning Brief”.

As such the “Key Development Principles” are:-

- “Enhanced employment provision”
- “A liveable environment compatible with surrounding uses, including residential”
- “Incorporate and restore a network of naturally functioning watercourses and drainage ditches”
- “Retention of historic buildings and enhancement of their setting”
- “Improved permeability and appropriate walking and cycling environment”
- “Introduction of characteristic and multifunctional open spaces and vegetation in the public realm”

“Following consultation on the draft document, the Planning Brief will be finalised and published. Once published, the Planning Brief will be a material consideration in making planning decisions relating to the Brooks Road area.”

“The consultation closes on 01 December 2022.”

Part Two: Assessment:-

This consultation is to be welcomed as it recognises the level of change that is happening in the area.

The purposes of the planning brief are to:-

- “Bring together evidence & aspirations for the Brooks Road area”
- “Understand the challenges and opportunities for development”
- “Set out the approach to redevelopment and guidance on key issues relevant to the area”

It is recognised that it is important for the SDNPA as the planning authority to be pro-active in ensuring that the Brooks Road area offers genuine redevelopment employment opportunities for larger established manufacturing businesses.

In addition, “Lewes should create spaces for the future economy and lead the way in supporting applications for new start-up businesses and retaining existing small businesses throughout the town.”

In part 6 of the consultation document entitled an “Approach to Redevelopment” includes an “Illustrative Sketch Layout” with the some of the ‘key principles’ explained in more detail in “Appendix 2” on page 26.

These 'key principles' include the following elements:-

- The main vehicular routes.
- Existing and new Green Infrastructure.
- Blue Infrastructure, a SuDS, (sustainable drainage system), connected to a ditch network.
- Green Street with vegetation as per the LNDP, (Lewes Neighbourhood Development Plan).
- Areas with potential for public realm / open space.
- Built form with active frontages facing Green and Blue Infrastructure and public realm.

The Friends of Lewes support the principles of the Planning Brief and the key land use principles in section 6.1.1., and the Society fully appreciates and supports the need to maintain a strong manufacturing base within the plan area, including uses that fall within use class B2 (general industrial). However, it is unclear how this will be achieved given the generous permitted development rights which allow changes to Class B1 (business) and B8 (storage and distribution) and from Class B1 (a) offices to Class C3 (dwelling houses). Section 6.1.2 excluding trade-counter, or storage and distribution uses is also welcomed in this context.

The Planning Brief appears to be very high level and aspirational and fails to address how the supply of different commercial units matches demand.

In order to achieve the above objectives it is critical that the current series of ad-hoc piecemeal redevelopment of sites in different existing ownerships must be resisted in order to achieve a more co-ordinated and coherent plan for the overall area.

Such an approach would require the opportunity to provide plots with new 'street frontages', which would also enable improved links to be achieved for both pedestrians, cyclists and delivery vehicles throughout the area in order to achieve a fully integrated business community.

In this context, an increasing number of people now live and work throughout the area, or need to pass through it to access the town centre with its wide range of shops, Post Office sorting office and access to a wide range of bus facilities. Indeed, the whole area is currently rather bleak for both pedestrians who would appreciate the provision of additional measures to separate them from passing traffic. For example, there is currently no link from new developments in the vicinity of the Tesco supermarket to the nearby recreation ground, the south east side of Brooks Road has no pavement and there is a lack of a suitable safe crossing point between Aldi and Daveys Lane.

Part Three: Observations:-

Whilst this initiative is to be welcomed, closer examination of the Brooks Area on a larger scale plan confirms that there are very few sites that are actually available for commercial redevelopment. In particular recent housing developments such as "The Nurseries" have encroached on land that could have been used as a principal employment site under Policy SD35 of the South Downs Local Plan.

In this respect, the brief is disappointing in its understanding, fails to provide robust aspirations and translates into weak and ill-considered proposals which could harm the long-term future of the town.

The prospect of further flooding in this area is not considered or addressed, especially in terms of climate change and the likelihood of more water runoff from the increased provision of hard surfaces.

The transport network within and adjacent to the site has not been taken fully into account, or likely to deliver the necessary active travel arrangements or deter greater car use. Furthermore, this area will have to accommodate any increase in traffic that would occur should the Malling Farm site be developed for large scale housing.

With the potential loss of a large number of public parking spaces from the anticipated redevelopment of the North Street Quarter site on the west side of the River Ouse, there may be the need to establish a long stay car park within the Brooks Road area, in order to enable both local employees and visitors to park within walking distance of the town centre.

It is considered essential to try to maintain some of the wildlife value of the area by creating a wildlife corridor / nature reserve along the banks of the watercourse that runs behind Spences Lane, which could provide a habitat linkage between the Downs Special Area of Conservation and the River Ouse.

In order to achieve some parts of the “Illustrative Layout” detailed on page 26, the demolition of a number of existing large scale commercial buildings would be required, which may not be a realistic option.

In response to this challenge, it would seem essential to carry out the following measures:-

- (1) To resist piecemeal development within this critical development area.
- (2) To ensure that there is adequate scope for larger scale buildings to be either retained or redeveloped for commercial purposes.
- (3) To robustly resist any multi use re-developments on small sites, for example those with a limited amount of commercial development at ground floor with a large number of flats above, which may weaken the overall commercial viability of the area.
- (4) Any further residential intrusion within the Brooks Road plan area is considered not only likely to constrain employment uses but also to frustrate any relocation of industry and business from the North Street Quarter site to Brooks Road.
- (5) Indeed, as the amount of land ‘available’ for commercial development is so severely limited, to reject any further housing units within Brooks Road Area.
- (6) To significantly improve the ability of Brooks Road to cater for the likely increase in vehicular traffic, to cater for improved bus services, and to provide safe links for both pedestrians and cyclists throughout the area.

Part Four: Conclusions:-

- (1) This Brooks Road Planning Brief, although welcomed in principle, should not be approved at this stage.
- (2) A number of basic modifications are required in order to make this Planning Brief “fit for purpose” and as such have a greater chance of success.
- (3) A more detailed appreciation of the current site conditions would make the Planning Brief more relevant.

(4) A greater understanding of how little land is actually available for future commercial development would help 'focus' attention on which sites should be considered a 'priority'.

(5) Any planning applications for 'piecemeal' development of this site should be refused at this stage.

(6) Any further housing development should be resisted until the Planning Brief for the whole Brooks Road Area has been agreed.

(7) The Planning Brief for this area should be able to accommodate any transfer of employment uses from the North Street Quarter site, in order to enable the Local Plan aspirations to be realised on this important brownfield site.

REM: SDNPA Brooks Road Planning Brief Consultation: 28th November 2022.