



**Brighton & Hove
City Council**

**Proposed Submission City Plan Part 2
Brighton & Hove Development Plan April
2020**

Hearing Session: 5 November 2021 (AM)

**Statement in Response to Matter 4:
Employment & retail Land**

**BY
BRIGHTON & HOVE CITY COUNCIL**

List of Abbreviations

AMR - Authority Monitoring Report
BHCC – Brighton & Hove City Council
CPP1 - City Plan Part 1
CPP2 – City Plan Part 2
DA - Development Area
SA - Sustainability Appraisal
SSA – Strategic Site Allocation

Issue 1 Delivering employment and retail land

City Plan Part 1 sets out the overarching strategic policy related to the economy, recognising the need for inward investment opportunities, diversification and business resilience and the role and needs of certain sectors of the economy. It supports the retail, culture and leisure economy of the City recognising their role in the local and sub-regional economy, sustainable transport and sets out the strategic approach to safeguarding needed employment sites and bringing forward new employment floorspace guided by the evidence base. That focuses development towards Development Areas (DA1-DA8) which provide opportunities for regeneration and include strategic allocations bringing forward employment floorspace to meet a proportion of the forecast need for employment floorspace over the plan period. City Plan Part 1 acknowledges that there is a shortfall of employment sites to meet the identified needs and specifically identifies a role for this Plan in allocating additional employment sites and mixed use allocations to ensure employment land delivery is maintained over the plan period (CP3.6). This it does through Policies SSA1-SSA4, in the mixed use housing allocations in Policy H1, and in Policy E1 in accordance with CP3.6.

The role of this Plan is to allocate non B class uses (as was then) and additional employment and mixed use allocations to ensure employment land delivery is maintained over the Plan period. It is recognised that outstanding requirements will be met through a coordinated partnership approach with neighbouring authorities and the Local Enterprise Partnership.

Q1. Given the above, can the Council confirm the context to the provision of employment land provided by City Plan Part 1 and the role of this Plan in this regard? (see Initial question 20-22 and Council's response)

1. The context to the provision of employment land provided by the CPP1 is the role of the city as a successful regional employment hub, the positive forecast growth in jobs to 2030¹ and the continuing demand by businesses for good quality employment floorspace. The Brighton & Hove economy has grown significantly over the past decade across a wide range of sectors, but notably advanced service sectors such as finance, digital and media. Public administration, education and health remains the highest employment sector. The city and its partners in the sub-region want to build on that success and develop a city region that is attractive to businesses with the necessary amenities and infrastructure businesses

¹ As set out in CPP1 C3 table 4 and BHCC01 Response to Inspector's Initial Questions: Forecast employment land requirement to 2030: 112,240 sq m of office space and 43,430 sq m industrial floorspace.

need to thrive. An ongoing priority is to create new space for businesses to start-up and grow.

2. The CPP1 was not however able to identify sufficient sites to meet all the identified forecast demand for employment floorspace² to 2030. As identified in Appendix 4, Table 4 of BHCC01 Response to Inspector Note 1 – Inspector’s Initial Questions, a shortfall of:
 - between 16,240 to 21,240 sq. m of office floorspace (B1a and B1b as described then); and
 - 33,930 sq. m of industrial floorspace (B1c, B2 and B8 as described then).
3. The CPP1 therefore identified the role for CPP2 to allocate additional employment sites and mixed use allocations to ensure employment land delivery is maintained over the plan period (CP3.6). Importantly, CPP1 also acknowledged that this shortfall would also need to be addressed through a coordinated partnership approach with neighbouring authorities and the Local Enterprise Partnership. This was accepted by the CPP1 Inspector³.
4. Section 3 of CD20 City Plan Part Two Scoping Consultation Paper June 2016 sets out the issues and options related to employment land provision that needed to be considered through the preparation of the CPP2 and included a ‘call for sites’ exercise. The outcome of the scoping consultation is set out in CD22a CPP2 Scoping Report Statement of Consultation January 2017 (updated June 2018) at Appendix 5. Further detail on how potential sites were assessed is set out in TP07 Site Assessment Topic Paper May 2021 and in the council’s response to Matter Statements 5, 6 and 9.
5. CPP2 fulfils its role through Strategic Site Allocations (in particular SSA1 - 4 but with potential for employment land identified within SSA5 and SSA7) in the mixed use housing allocations in Policy H1, and in Policy E1.
6. The allocations accord with CPP1 spatial strategy which seeks that through the regeneration of key sites new employment floorspace can be created. Without the industrial heritage of other cities, the supply of employment land and premises is limited in the city. In accordance with the CPP1 regeneration of brownfield sites for employment and housing within Central Brighton sites and Development Areas will make the effective use of brownfield sites.

² As set out in Table 4 of the CPP1 Policy CP3 (based on the 2013 Employment Land Study).

³ CD15 -The City Plan Part One Inspector’s Report

Q2. Would the Plan meet those requirements? Would the Plan make appropriate provision for non B class uses (as was then) and additional employment and mixed use allocations to help ensure employment land delivery is maintained over the Plan period? (see Initial question 20-22 and Council's response)

7. Yes, given the context of competing demands on the city's limited supply of land, the Plan has made appropriate provision for employment land over the plan period. Table 4 in Appendix 4 of BHCC01 Response to Inspector Note 1 – Inspector's Initial Questions indicates quantitatively the CPP2 planned employment land provision. The table shows that through CPP2 strategic site allocations (in particular SSA1 -4 but with potential for employment land identified within SSA5 and SSA7) and mixed use housing sites in Policy H1 and through Policy E1, delivery of additional employment land will be maintained over the plan period reducing the shortfall of employment sites against the forecast needs.
8. The Employment Land Trajectory Update (contained within ED17 Housing and Employment Land Study, December 2017) at table 7, page 19 provides an updated potential office supply position of 94,500 sq m of office floorspace over the plan period – reducing the office floorspace shortfall to 17,740 sq m when compared with the 2013 Employment Land Trajectory produced for the CPP1.
9. As identified in Appendix 4, Table 4 of BHCC01 Response to Inspector Note 1 – Inspector's Initial Questions, through the CPP2 there is the potential to deliver a minimum of 10,000 sq m additional office floorspace, over the plan period thereby reducing the residual office floorspace shortfall.
10. As explained in Appendix 5 of BHC01 Response to Inspector Note 1 – Inspector's Initial Questions, identifying and allocating suitable sites for industrial and warehousing uses in the city continues to be constrained by suitable land supply. The Employment Land Trajectory Update (ED17, table 7, page 19) shows an improved position of supply of 13,852 sq m of industrial and warehouse floorspace supply provision compared with 2013 employment land trajectory produced for CPP1, thereby reducing the shortfall to c.29,578 sq m when compared with the 2013 Employment Land Trajectory.
11. CPP2 Policy E1, informed by OD78 Brighton & Hove Industrial Estates Audit December 2017, provides the potential for the shortfall in industrial/ warehousing floorspace to be further reduced alongside the delivery of a strategic waste facility on the site. See also the council's response to Matter Statement 9.
12. The city contains a number of major employment generators including the two universities and the Royal Sussex County Hospital. CPP1 indicated that the council will work with the higher and further education sector,

Sussex University Hospital NHS Trusts and NHS Brighton & Hove to support appropriate expansion through strategic allocations in DA3 Lewes Road Area and DA5 Eastern Road and Edward Street Area. Non-B Class uses are estimated to account for approximately 71% of all jobs in Brighton & Hove and are expected to remain broadly consistent over the plan period to 2030. Through the CPP1 policies SA2 Central Brighton, CP4 Retail Provision and CP6 Culture and Tourism set out the approach to addressing the identified retail, culture, leisure and tourism needs to 2030 (as summarised in CPP1 Table 2).

13. Informed by this overarching strategy and CP2.6, the CPP2, through strategic site allocations makes appropriate provision for employment-generating non-B Class uses as following, in accordance with CP2.6:

- **Health/community uses** - SSA1 Brighton General Hospital addresses identified need for a modern replacement health care facility. SSA allocations also refer to health/community facilities as part of permitted uses.
- **Retail** - in light of the retail allocations at CPP1 DA1 and DA2 - it was not considered necessary for CPP2 to allocate further sites for comparison retail floorspace but for place-making opportunities, strategic site allocations, where appropriate, indicate ancillary retail as part of mixed uses proposed. Policies DM12-16 guide new retail development. Proposed modifications set out in BHCC02 Updated Schedule of proposed modifications to the submission CPP2 August 2021 to reflect changes in Use Class Order will provide greater flexibility to the range of non employment uses in identified retail centres.
- **Education** – guided by CD03 Annexe 2 Infrastructure Delivery Plan June 2017 and more recent school organisations plan reviews, no further sites for schools were required but SSA7 provides opportunity for health/education uses associated with the Stadium and/or Sussex and Brighton Universities to come forward on the site in accordance with DA3.
- **Culture/ Leisure/tourism** – SSA5 and SSA6 reflect the council's priority (as identified in CPP1 The Seafront) for the regeneration of the eastern seafront, reflecting its tourism, leisure, recreation and culture role.