Lewes District Local Plan: Issues and Options

TOPIC 5: PROMOTING A PROSPEROUS ECONOMY AND BUILDING COMMUNITY WEALTH

July 2021

Lewes District Council

Lewes District Local Plan: Issues & Options Consultation

TOPIC PAPERS

A series of Topic Papers have been prepared to support the Lewes District Local Plan Issues and Options Consultation and assist you in understanding the issues and options facing Lewes District (outside of the South Downs National Park) by providing more details on the topic address in the consultation. The topic papers are as follows:

Topic Paper 1	**Tackling Climate Change**
Topic Paper 2	**Protecting and Enhancing the Quality of the Environment**
Topic Paper 3	**Accommodating and Delivering Growth**
Topic Paper 4	**Improving Access to Housing**
Topic Paper 5	**Promoting a Prosperous Economy and Building Community Wealth**
Topic Paper 6	**Creating Healthy Sustainable Communities with Infrastructure**

All of the topic papers are available on-line via the Council's consultation portal.

The topic papers are factual in nature and set out how the topic is covered in current local plan policies, the national planning policy context, how the related issues are addressed in the Lewes District Council Corporate Plan and other strategies, what current evidence and data tells us about the topic, and provides details on the issues raised from these. The questions arising from the topic papers are posed within the Issues & Options document. As such we are not seeking comment on these topic papers.

Topic Paper 5: Promoting a Prosperous Economy and Building Community Wealth

1. Introduction

1.1 One of Lewes District Council's priorities is to create a sustainable economy that enables a fairer place to live and work for all, and the Local Plan has an important role to play in helping to stimulate and maintain a buoyant and balanced local economy that keeps wealth generated within the local area.

1.2 This Topic Paper has been prepared to consider how the new Local Plan should address the economy and promote a prosperous economy and community wealth generation. It covers a broad range of subjects including the potential for economic growth in office, industrial retail and town centre uses, the future development needs for the plan area and how other important of areas of the local economy, such as tourism, can be supported.

2. Current Local Plan Policies

2.1 Core Policy 4 (*Encouraging Economic Development & Regeneration)* establishes that the Council will take a flexible and supportive approach to economic development by identifying employment sites to meet current and future needs, safeguarding and supporting the appropriate intensification of existing employment sites, supporting the delivery of new office space and flexible, start-up business units, sustainable economic growth in the rural areas, the expansion and modernisation of Newhaven port and opportunities for improving the skills of the district's labour supply, and promoting sustainable tourism, high speed e-communications and IT infrastructure.

2.2 Core Policy 5 (*The Visitor Economy)* supports opportunities for the sustainable development of the visitor economy where they are of a scale, type and appearance appropriate to the locality and provide local employment. There is a presumption in favour of the retention and improvement of existing visitor accommodation.

2.3 Core Policy 6 *(Retail and Town Centres)* sets out the Council's overall approach to maintaining and enhancing the vitality and viability of town, district and local centres. The policy identifies primary shopping areas and frontages in Seaford, Newhaven and Peacehaven, and seeks to ensure that local centres retain accessible local shops and services. The Sequential Test will be applied for edge or out of centre retail development proposals. There is a presumption in favour of retaining local shops outside of the identified retail hierarchy.

2.4 These existing strategic policies are considered to be broadly in conformity with the National Planning Policy Framework (NPPF). However it is acknowledged that they do not fully reflect the Council's ambitions around Community Wealth Building and keeping resources within the local area, and that there have been some recent changes regarding use classes and permitted development rights. Also, it is recognised that the Covid-19 impact is going to have a significant impact on the local economy, and these changes need to influence planning policies in the new Local Plan going forward.

3. National Planning Policy and Guidance

3.1 The NPPF requires local plans to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. Local plans should identify anticipated needs over the plan period and identify sites for local and inward investment to meet that need, whilst being flexible enough to accommodate changes in response to economic circumstances. In identifying sites, local plans should recognise the specific location requirements of different sectors, including provision for clusters and networks of knowledge, and storage and distribution in accessible locations.

3.2 Local plans should enable sustainable growth and expansion of businesses in rural areas, including agriculture and sustainable rural tourism and leisure. In doing so, local plans should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

3.3 The NPPF requires local plans to define a network and hierarchy of town centres, including their extent and primary shopping areas, making clear the range of uses permitted in such locations and allocating sites to meet the scale and type of town centre development needed.

3.4 The NPPF also sets out the sequential test, whereby main town centre uses should first be directed to existing town centres and edge of centre sites, and only where no suitable sites are available, should out of centre sites be considered.

3.5 Planning Practice Guidance (PPG) requires local plans to be based on a robust evidence base to understand existing and potential future business needs, and to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones). It will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed. Land Availability Assessments should identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.

3.6 PPG confirms that town centres comprise a range of locations where main town centre uses are concentrated, including city and town centres, district and local centres (and so includes places that are often referred to as high streets).

3.7 PPG suggests that in addition to a wide range of complementary uses such as employment, office, commercial, leisure/entertainment, healthcare and educational development, residential development, including specialist housing for different groups including older people, within or on the edge of town centres, can play an important role in ensuring vitality and giving communities easier access to a range of services. Evening and night time activities also have the potential to increase economic activity and provide additional employment opportunities.

4. Council Corporate Plan 2020-24

4.1 Creating sustainable community wealth is a focus for the Corporate Plan, in order to provide a people-centred approach to local economic development that redirects wealth back into the local economy, which benefits residents and local companies.

4.2 The Corporate Plan aims to achieve this by prioritising investment into local economies, including the rural economy, across the district, and support business start-ups and existing businesses to create new employment opportunities for local people through supporting innovation and technological advances, including in clean technology and in the creative sector.

4.3 The Corporate Plan also seeks to develop local skills, supply chains and employment through partnership working with a particular focus on clean, green technologies.

5. Other Strategies

Community Wealth Building - Reimagining Lewes District Action Plan

5.1 In December 2020, Lewes District Council agreed a 'Reimagining Lewes District Action Plan' to develop the Community Wealth Building approach that was identified in the Corporate Plan.

5.2 The Action Plan identifies a wide range of short-term, medium-term and long-term actions to be undertaken to support Community Wealth Building. These include *incorporating social value into new sustainability checklist in planning and build CWB approaches into future planning policies.*

East Sussex Economy Recovery Plan

5.3 East Sussex Reset: Recovery As Opportunity was developed by Team East Sussex (TES) to respond to businesses, skills and employment challenges post Covid-19 pandemic.

5.4 The Recovery Plan identifies six missions to support the East Sussex economy:

- Thinking local, acting local
- Building skills, creating jobs
- Fast-forwarding business
- Better places, fuller lives
- Cleaner energy, greener transport
- The future is digital

5.5 The Recovery Plan seeks to turn recovery into growth and build investment whilst driving towards a low-carbon, circular economy. Part of this will include taking advantage of any shift towards home and local working, to reduce commuting and to encourage businesses of all kinds to consider relocating to East Sussex. The Plan identifies the need to retain local skills, support employment and grow an agile workforce with greater skills levels, and offer targeted support for the development of sector specific skills. It will also be important to support the revival and adaptation of town centres, including Covid-19 secure spaces.

Strategic Economic Plan

5.6 Lewes District Council is a member of the South East Local Enterprise Partnership (LEP) covering East Sussex, Kent, Essex and the Thames Gateway. The South East LEP published its Strategic Economic Plan in 2014, setting out proposed programmes of investment in critical infrastructure, together with additional measures to help deliver business growth across the area.

5.7 Within Lewes District, Newhaven is identified as a priority growth location in the Strategic Economic. In addition, the Greater Brighton City Deal, a partnership between the public and private sectors, identifies Newhaven as one of a network of 'Growth Centres' that are intended to act as anchors for the growth of high value business across the sub-region.

5.8 The LEP Strategic Economic Plans and the Greater Brighton City Deal recognise the importance of the emerging environmental technologies cluster at Newhaven, together with the existing maritime activities at the port and opportunities to further develop passenger and freight services. The City Deal also recognises that the provision of high quality jobs in Newhaven will reduce pressure to create jobs in the city of Brighton & Hove and ensure that good quality employment opportunities are spread across the City Region.

5.9 The Strategic Economic Plans of the LEPs and the Greater Brighton City Deal have already succeeded in attracting investment into Newhaven, including funding to deliver the new Port Access Road and to enable the completion of new flood defences at Newhaven, which will provide a 1-in-200 year standard of protection and enhance investor confidence and the viability of employment development in this location. Enterprise Zone status has also been achieved on 79ha of land across eight sites within the town.

HM Government Ten Point Plan for a Green Industrial Revolution

5.10 The Ten Point Plan for a Green Industrial Revolution focuses on investing in making the UK a global leader in green technologies by increasing ambition in the following areas:

1. advancing offshore wind
2. driving the growth of low carbon hydrogen
3. delivering new and advanced nuclear power
4. accelerating the shift to zero emission vehicles
5. green public transport, cycling and walking
6. ‘jet zero’ and green ships
7. greener buildings
8. investing in carbon capture, usage and storage
9. protecting our natural environment
10. green finance and innovation

5.11 The Ten Point Plan will mobilise £12 billion of government investment, and potentially 3 times as much from the private sector, to create and support up to 250,000 green jobs.

6. Evidence / Data

Businesses demography

6.1 In 2019, Lewes District contained 4,730 active businesses, representing an increase of 10% over the previous 10 years[1]. Although the annual number of business start-ups over the 10 year period between 2009 and 2019 was relatively consistent, on a per capita basis this is below average rate of new business registration, particularly compared to the regional and national picture.

[1] Business Demography (Office for National Statistics Business Demography tables) via East Sussex in Figures

Figure 1 – Change in number of businesses

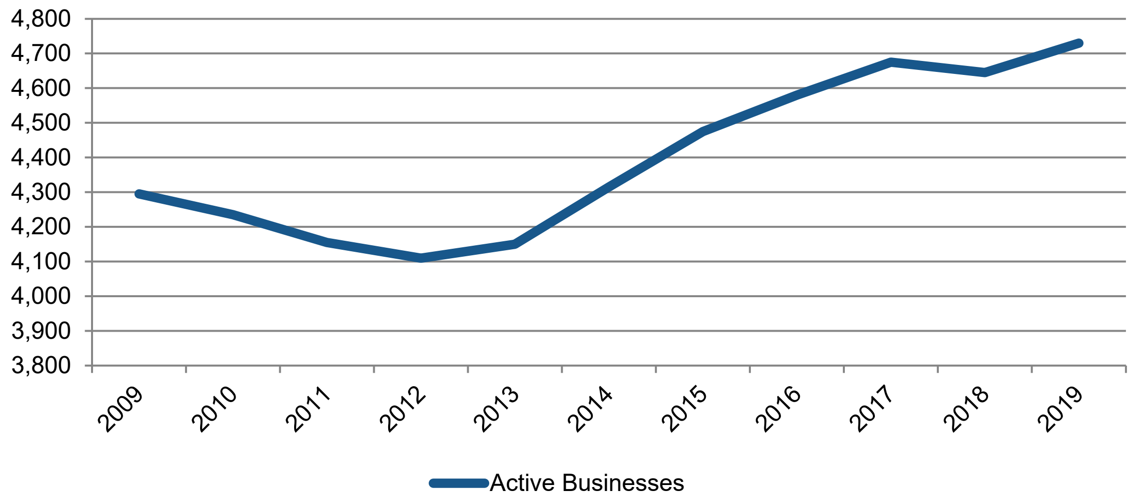
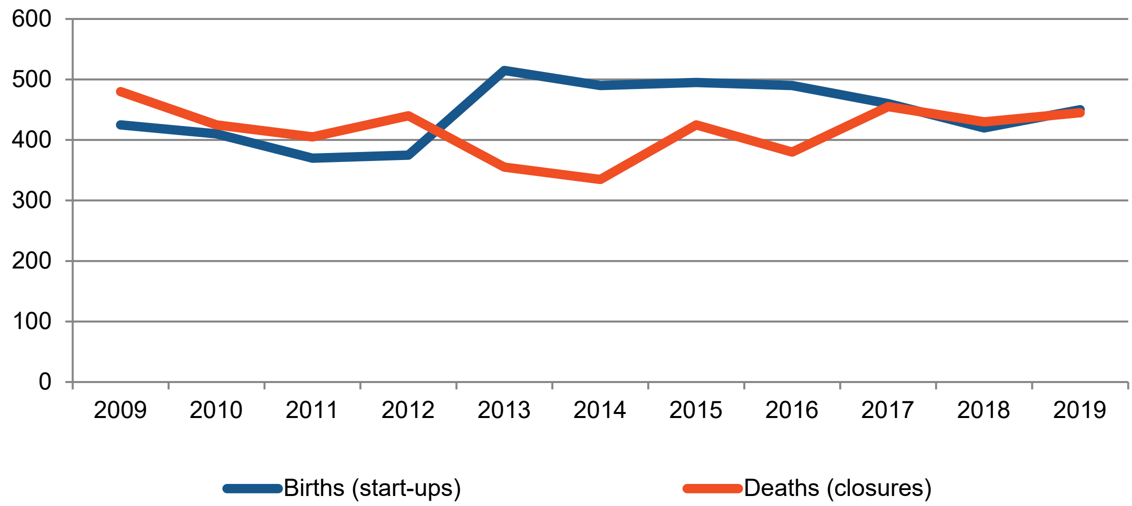


Figure 2 - Business Start-ups and Closures

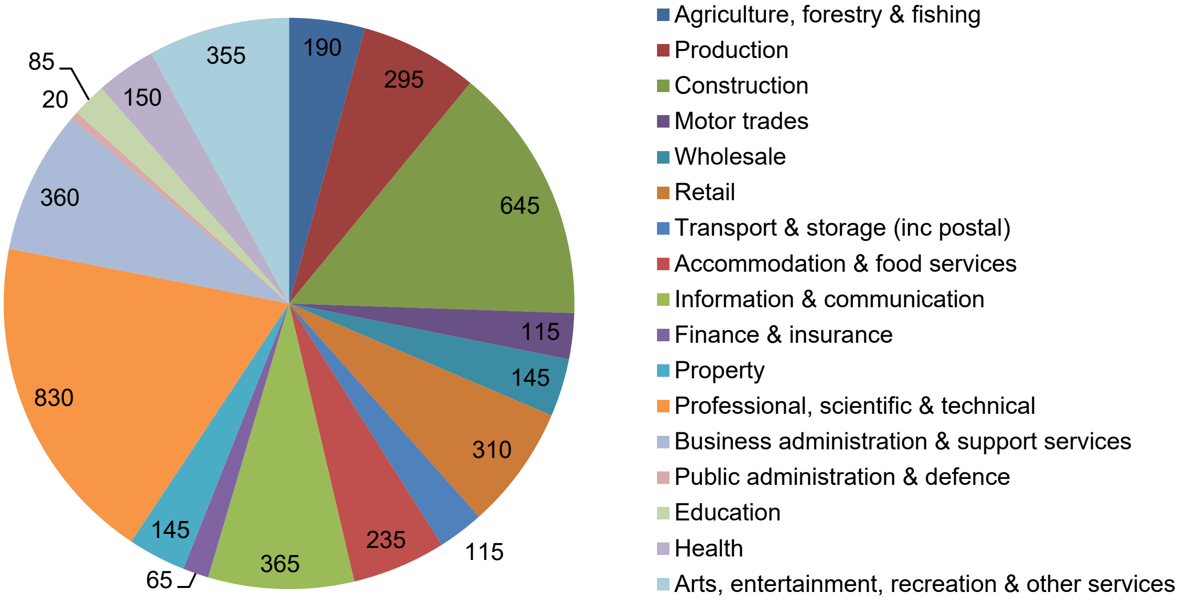


6.2 Businesses operating in the 'Professional, scientific and technical' sector are the most common in Lewes District, although the 'Construction' sector is also well represented[2]. The majority of businesses in Lewes District are small, with 90% employing less than 10 people. There are 15 large businesses in the district that employ more than 250 people, which as a percentage of all businesses in the area is above average for East Sussex[3].

[2] Business enterprises by industrial group (Office for National Statistics (ONS)/Inter Departmental Business Register (IDBR)) via East Sussex in Figures.

[3] Business enterprises by size of business (Office for National Statistics (ONS)/Inter Departmental Business Register (IDBR)) via East Sussex in Figures.

Figure 3 - Business enterprises by industrial group (2020)



Business units and floorspace

6.3 The Inter Departmental Business Register (IDBR) indicates that Lewes District contains 5,030 local business units (an individual site that is part of an enterprise situated in a geographically identified place). This data is consistent with data on business enterprises, and suggests that on average, business enterprises occupy 1.14 units each. The number of business units has increased by around 10% over the previous 10 years, a similar rate of growth as with the total number of active businesses. 17% of local business units are occupied by businesses within the 'Professional, scientific and technical' sector.

6.4 According to the Valuation Office Agency[4], Lewes District has a total of 3,670 commercial hereditaments, providing 650,000 sqm of floorspace. This includes:

- 760 hereditaments in Retail use, amounting to 112,000 sqm of floorspace
- 680 hereditaments in Office use, amounting to 61,000 sqm of floorspace
- 1,230 hereditaments in Industrial use, amounting to 357,000 sqm of floorspace

6.5 The total number of commercial hereditaments increased by 710 over the ten years to 2020, although the number has remained consistent over the past three years. The greatest growth has been in Industrial hereditaments, which have increased by 260 over ten years.

6.6 Of the total number of commercial hereditaments in the district, 45% are located within the coastal towns. However, this rises to 56% of all retail hereditaments. 44% of Industrial hereditaments are in the coastal towns, whilst just 29% of office hereditaments are located in the southern part of the district.

[4] Business floorspace and rateable value (Valuation Office Agency (VOA)) via East Sussex in Figures

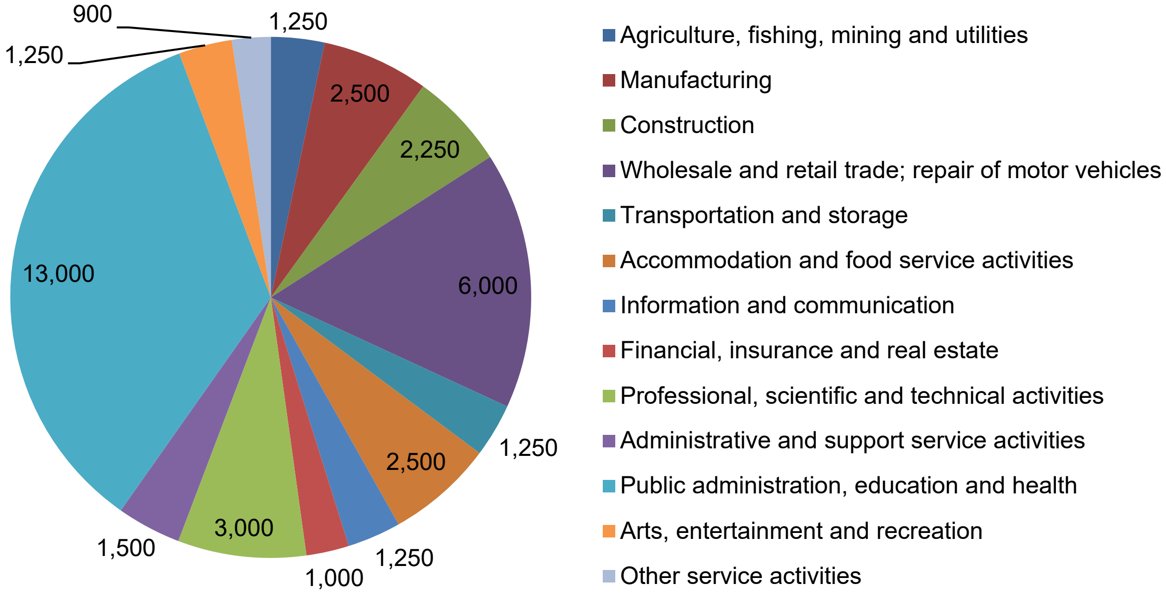
6.7 In 2019/20, there was a net gain of 4,618 sqm in employment land developed in the plan area[5]. This included an increase of over 6,100 sqm of light industrial floorspace, which was off-set by a loss of over 1,700 sqm of warehouse space. There was also a net increase in employment land developed in 2018/19 of 2,486 sqm.

Jobs and Employment

6.8 Lewes District's job density (ratio of the number of jobs in an area to the resident working-age population) is 0.83 – the highest in East Sussex[6]. 85% of the district's population is considered to be economically active, which is also the highest in East Sussex and greater than the regional and national average[7].

6.9 35.1% of working people in the district are employed in 'Public administration, education and health' sector, and the 'Wholesale and retail trade' sector also employs a significant number of people[8]. An above average proportion of people are employed within creative industries (5.1%), particularly the 'IT, software and computer services' sector.

Figure 4 - Employment by industry (2019)



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[5] Lewes Authority Monitoring Report 2019

[6] Jobs Density (Nomis/Office for National Statistics) via East Sussex in Figures

[7] Economically active and inactive population (Annual Population Survey/Labour Force Survey, NOMIS/ONS) via East Sussex in Figures

[8] Employment by industry UK SIC(2007) (Business Register and Employment Survey (BRES), ONS/Nomis) via East Sussex in Figures

6.10 Between 2015 and 2019, there was an increase in the proportion of employees in the public sector in Lewes District to 22.3%, which is not consistent with elsewhere in East Sussex where the proportion has generally remained at the same level[9].

6.11 Around 4% of the 37,000 people in Lewes District in employment in 2019 were working proprietors of businesses (including self-employed). Of the employees, 63% were employed on a full-time basis, and 37% on a part-time basis[10].

6.12 The unemployment rate for the district was estimated to be 3.6% between July 2019 and June 2020. Unsurprisingly, the number of people in the district claiming Jobseeker's Allowance or Universal Credit because they are out of work has risen significantly from 1,330 in January 2020 to 3,190 in January 2021, with the largest increases seen in the coastal towns. The claimant rate is particularly high in the 18-24 age group, where 22.3% are claimants[11].

6.13 Data from 2011 census suggested that nearly 20,000 people commute out of Lewes District for work, with the majority of those going to Brighton and Hove. Just over 14,000 people travel into the district, mainly from Brighton & Hove, Wealden, Mid Sussex and Eastbourne, which means that overall, 5,514 more people commute out of Lewes District than in. 21,339 people live and work in the district[12].

6.14 Current projections indicate that the workforce in Lewes District[13] will increase from 49,091 in 2018 to 51,269 by 2033. The economic activity rate (proportion of those aged 16+ who are engaged in or seeking gainful employment) is expected to fall from 67.2 in 2018 to 66.2 in 2033, reflecting an ageing population.

Wealth and Earnings

6.15 Gross value added (GVA) is a measure of the increase in the value of the economy due to the production of goods and services. In 2018, GVA per head was £17,802 in 2018; an increase from £15,107 in 2008. Although this is the highest in East Sussex, it is still significantly below the regional and national average. The 'Real Estate Activities' sector contributed the highest proportion to the district's GVA, although 'Public Administration and Defence' also made a significant contribution[14].

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[9] Employees in the public and private sector (Business Register and Employment Survey (BRES), Office for National Statistics (ONS)) via East Sussex in Figures

[10] Employment status (Business Register and Employment Survey (BRES), ONS/Nomis) via East Sussex in Figures

[11] Claimant Count including JSA and Universal Credit (Office for National Statistics/NOMIS.) via East Sussex in Figures

[12] Location of usual residence and place of work (Census 2011) via NOMIS

[13] Workforce projections by age group (East Sussex County Council) via East Sussex in Figures

[14] Gross Value Added (Office for National Statistics) via East Sussex in Figures

6.16 In 2018, tourism contributed £180.8 million to the district's economy; an increase of £6 million on 2017. This increase was a result of growth in overnight trips from both domestic and overseas visitors, although this was partially offset by a fall in day trips[15].

6.17 Lewes District has the highest average gross annual earnings by residence in East Sussex at £26,228[16]. However, the average gross annual earnings by workplaces in Lewes is less at £22,939, which suggests that locally based jobs are more likely to be lower waged jobs, and the highest earners are more likely to travel outside of the district for work. Average household income estimates are higher in the northern part of the district compared to the coastal towns[17].

Covid-19 economic vulnerability

6.18 The Covid-19 economic vulnerability index, which measures the number and percentage of jobs and employees which are at risk as a result of the Coronavirus crisis, suggests that Lewes District is the least vulnerable part of East Sussex, although the rate for Lewes District is similar to the regional and national average. It identifies that 25.4% of jobs and 24.8% of employees are at risk due to the pandemic. However, there are differences across the district, with greater vulnerability in the coastal towns than the north part of the district[18].

6.19 On 31st January 2021, there were 10,800 people on Government employment support schemes (Coronavirus Job Retention Scheme/Furlough or Self-employment Income Support Scheme). This represents 18.3% of the working age population of the district.

Deprivation

6.20 The Indices of Deprivation 2019 ranked Lewes District at the 194th most overall deprived local authority area out of 317 in the country. Lewes District did not have any areas that were in the most deprived 10% nationally[19]. The biggest relative issue for deprivation relates to Barriers to housing and services, for which Lewes District is the 89th most deprived local authority area out of 317 in the country.

6.21 However, some parts of the District experience greater levels of deprivation that others. Generally, deprivation is a greater issue in the coastal towns than the

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[15] Lewes Authority Monitoring Report 2019

[16] Average (median) earnings (Annual Survey of Hours and Earnings (ASHE), Office for National Statistics) via East Sussex in Figures

[17] Small area household income estimates (Office for National Statistics (ONS)) via East Sussex in Figures

[18] Covid-19 economic vulnerability index (Oxford Consultants for Social Inclusions (OCSI)/Office for National Statistics(ONS)/Census 2011 (using methodology developed by RSA)) via East Sussex in Figures

[19] Indices of Deprivation (Ministry of Housing, Communities and Local Government (MHCLG)) via east Sussex in Figures

northern part of the district, particularly in relation to Employment; Income; and Education, skills and training.

Future Economic Development Needs and Forecasts

6.22 The Local Plan Part 1 was informed by the Lewes District Employment and Economic Land Assessment (EELA) 2010, and the partial update published in 2012. New evidence on economic development needs taking into account more recent economic growth forecasts, particularly in light of Covid-19, will be required to identify the amount and type of employment space required to be provided by the new Local Plan.

7. Key Issues

7.1 There are a number of challenges for the new Local Plan relating to the promotion of prosperous economy:

- Embedding community wealth building in the Local Plan to capture the maximum wealth produced through construction and use values, supporting business start-ups and increasing local employment opportunities to redirect wealth back into the local economy
- The main focus of economic activity, the coastal belt, has a 180 degree hinterland, which mean reduced access to markets and creates greater difficulties in attracting investment and remaining competitive.
- Parts of the coastal belt contain pockets of socio-economic deprivation and imbalance, which is exacerbated by low average wages and an ageing population.
- High levels of out-commuting which is unsustainable and undermines the local economy.
- The provision of good quality modern business premises of all sizes in order to support the incubation, growth and retention of local businesses and the district's ability to attract inward investment.
- Enhancing relevant employment skills, training and support to meet the needs and aspirations of existing and potential companies and the local workforce
- The redevelopment and regeneration of vacant, underused or poor quality employment sites that often come up against issues of financial viability
- Unknown impacts on the economy of recent changes such as the Covid-19 pandemic and Brexit.
- The impact of Covid-19 pandemic on working practices, particular increasing need for access to good quality and high speed electronic/IT communications.
- Less ability to control and protect certain types of employment and commercial uses within particular areas.

Type and Amount of Employment Space Provision

7.2 The new Local Plan will be required to identify the amounts and types of employment space required over the plan period, and changes to the economy as a result of the Covid-19 pandemic are likely to have a significant impact on the types of jobs and the types of floorspace required in the future.

7.3 The economic impacts of the Covid-19 pandemic are likely to include a rises in unemployment levels, reduced business revenues, and increased home-based working, and may accelerate some pre-existing trends such as an increase in on-line shopping. The Local Plan will need to take account of this uncertainty and be flexible to deal with the issues arising from this. It should also seek to take advantage of any shift towards home and local working as a result of the pandemic, to help reduce the number of people commuting, encourage business to make provision closer to their workforce, and help keep wealth generated within the local area.

7.4 In terms of employment space, current market intelligence suggests that the industrial market in East Sussex is still very strong but is seriously hampered by lack of empty premises ready for companies to move into. The growing importance of on-line retailing has meant there is high demand for storage and distribution space, particularly near to population centres as customers have become used to receiving goods quickly. Such uses generally involve low job densities and low wage employment, and also often road orientated and require large sites with good access to the highway network, of which there are unlikely to be many available.

7.5 However, the ambition to build community wealth and help the micro-businesses, which dominate the business demographic of the district, will require different types of provision of employment space to be made. The provision of a range of suitable, small, flexibly managed units, including move-on space for small businesses that wish to expand, would help supporting local start-ups and the expansion of small indigenous firms, and help create and maintain wealth in the local community. It will be important for provision of such employment space to be made in the right places where it can be sustainability accessed and meet demand.

7.6 The Local Plan should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for employment development, whilst being flexible enough to accommodate needs not anticipated in the plan.

Type and amount of Retail and Town Centre uses

7.8 It is important that the changing nature of high streets and town centres are given consideration in the new Local Plan, with a focus on them being sustainable and wealth-generating community assets. ‘Place-making’ and good design will be an important part of this. Issues relating to design and beauty are address in the **Protecting and Enhancing the Quality of the Environment** Topic Paper.

7.9 The Covid-19 pandemic and changes to use classes and permitted development rights are likely to have a significant impact on town centres and retail provision, particularly in relation to the type and amount of new provision required. The new Local Plan will be required to identify need for future retail space in terms of types, sizes and locations over the plan period.

7.10 Despite lockdown restricting the opening of non-essential retail uses, market intelligence suggests that the secondary / tertiary (non-prime and out of centre) retail market in East Sussex is still relatively busy although rental levels dropped to generate interest. There are generally greater issues with prime retail and large units, although there is little of this type of retail in the plan area.

7.11 The Local Plan should provide a positive vision and strategies for town centres, including allocating a range of suitable sites in town centres to meet the scale and type of development likely to be needed.

Locations for Employment Space Provision

7.13 Newhaven is a significant economic driver for the area, and significant regeneration projects are taking place there. Newhaven Port is a key strategic asset both for the district and the wider region, and the continued growth of Newhaven is recognised as important in strategic economic plans and strategies. Development and job-creation opportunities related to the Port are considered vital to the regeneration of Newhaven and the surrounding coastal area and to improve the continental ‘gateway’ to the South Downs National Park. Newhaven also has the potential to provide employment possibilities close to areas with higher deprivation and build community wealth in the coastal belt.

7.14 Evidence supporting the Local Plan Part 1 suggested that there was not significant demand for employment sites in rural areas; however demand is being demonstrated through applications to create employment space in the area of the District to the north of the National Park. The Spithurst Hub, which is a rural business centre that provides co-working spaces for hire just north of Barcombe Cross, has proven to be successful since opening in 2017. It is anticipated that spaces such as this are likely to be popular going forward, and could have the potential to help with the Covid-19 recovery by providing workspace close to where people live. Additional employment provision in the Low Weald could assist settlements to become more self-contained and help reduce the need to travel. On the other hand, such locations are generally only accessible by car so anyone travelling from outside the immediate area would be less able to utilise sustainable travel methods.

7.15 The Local Plan should identify sites that recognise and address the specific locational requirements of different sectors and help create the conditions in which businesses can invest, expand and adapt.

Rural Economy

7.17 The rural economy is a vital aspect of the wider economy, as many jobs are provided in rural areas, often on smaller sites. The local plan can support the rural economy through increased flexibility to support the re-use and redevelopment of existing buildings and farm complexes which can bring redundant buildings back in to use which can enhance the appearance of the rural area.

7.18 The provision of communications infrastructure is important so that businesses within rural areas have access to high speed broadband that could unlock growth opportunities. This issue is addressed in the **Creating Healthy Sustainable Communities with Infrastructure** Topic Paper.

7.19 In order to support a growing population and retain wealth generated in the local area, as well as reducing the number of miles that food travels, the Local Plan should support agricultural and land-based rural businesses to diversify to help sustain the rural economy and ensure that agricultural businesses remain viable. The continuing functioning of farm businesses could be supported by providing flexibility for farmers to diversify through actions such as converting redundant agricultural buildings to other uses such as shops, leisure uses and offices, and through enabling new and replacement farm buildings where the old ones are unsuitable to support the continuing function of the farm business

7.20 Supporting the protection of best and most versatile agricultural land is also important for the food production industry, and therefore it would be appropriate for the new Local Plan to contain such a policy.

Protecting existing employment spaces and town centres

7.21 Changes to the use classes order made in September 2020 have resulted in the incorporation of retail, financial services, restaurants, offices, light industry and some non-residential institution and assembly and leisure uses into one use class (Class E). This means that these uses can change within the same class without needing to apply to permission, which has significant implications on the ability of the Local Plan to seek to provide or protect particular uses in specific areas that may help maintain the integrity of a particular area as an employment location or protect the vitality and viability of a town centre.

7.22 This will be exacerbated by the potential introduction of permitted development rights to allow Class E uses to convert to residential use without needing to obtain planning permission, and tools such as Article 4 Directions to protect these commercial spaces are proposed to be restricted through changes to the NPPF. Employment space is going to come under increasing pressure from potential conversion to residential use due to the high housing need and relative land values.

7.23 The NPPF also requires local plans to define the extent of town centres and primary shopping areas, and make clear the range of permitted uses in such locations. The creation of Class E makes this very difficult to control changes of use, or potentially even large parts of these centres being residential and therefore dead frontage, which will impact vitality. This could have impacts relating to proximity of services and facilities to local people, resulting in an increased need to travel to access these services and facilities elsewhere.

7.24 Current policy indicates that an issue around employment space is one of quality rather than quantity. It would be appropriate to seek the regeneration of vacant, underused or poor quality sites and premises and improve accessibility before allocating new green field sites for business development, but viability considerations often influence the ability to intensify employment sites, as commercial returns are often not high enough to justify redevelopment costs.

7.25 The new Local Plan will need to seek an appropriate balance between the protection of existing provision where it is of good quality and provide encouragement and support for redeveloping existing employment spaces to higher quality provision, whilst also enabling the provision of new high quality employment space on sites that would make such development viable.

Local Labour Agreements

7.27 A local labour agreement is a commitment from a developer to offer employment, training and education opportunities (e.g. apprenticeships) and use local labour and suppliers as part of the construction phase of development, and to employ local people in the operation of commercial development once it is completed.

7.28 The use of local labour within the construction and operational stages of development could have significant benefits for local communities by providing opportunities for small and medium-sized businesses and creating employment for local people. It also provides opportunities for the improvement of the skills and educational attainment levels of the district’s labour supply; all of which helps to keep wealth generated within the local community.

7.29 Lewes District Council has recently started to seek local labour agreements for major development in Newhaven to require local employment and training measures as part of development proposals, with the objective of improving training and skills to support the local economy. This approach can facilitate increases in work placement for students and unemployed people, NVQ starts and apprenticeships, as well as the use of local contractors in development and the employment for local people as part of the operation of the final property.

7.30 The Local Plan should build the concept of local labour agreements to promote local employment and training as part of new development into policy for the plan area.

Visitor Economy

7.32 The visitor economy is likely to experience significant change in the future as a result of the Covid-19 pandemic, which as one of the strongest performing sectors of the local economy, could have significant impacts.

7.33 The South Downs National Park is a significant influence on the visitor economy, and this can play a significant role in terms of providing employment opportunities, attracting investment and creating wealth, and therefore the Local Plan should support opportunities, particularly in more rural areas to the north of the National Park. However, it does need to be recognised that tourism alone will not lead to a buoyant rural economy and that other sectors are equally as important.

7.34 The Local Plan should support the visitor economy and recognise and embrace the potential of tourism for the local economy. The main issues are therefore whether there is a need to protect the existing tourism uses and accommodation, to encourage an increase in the amount and quality of tourist accommodation and facilities (where appropriate), as well as balancing this need against the priority to protect the rural district and its heritage and landscape.

GLOSSARY

Article 4 Directions – a direction made under article 4 of the General Permitted Development Order which enables the Secretary of state of the Local Planning Authority to withdraw specified permitted development rights across a defined area.

Circular Economy - the circular economy is a model of production and consumption, which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products as long as possible as such that the life cycle of products is extended.

Land Availability Assessment (LAA) - an assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.

Local Plan - the plan for the future development of the local area, drawn up by the Local Planning Authority in consultation with the community.

National Planning Policy Framework - sets out the government's planning policies for England and the methods by which they are expected to be applied and adhered to.

Sequential Test – a principle that seeks to identify allocate or develop certain types or locations of land before others.