

Report to	<b>Planning Committee</b>
Date	<b>9 Feb 2023</b>
By	<b>Director of Planning</b>
Title of Report	<b>Lewes Brooks Road, Planning Brief</b>
Purpose of Report	<b>To approve the post-consultation Planning Brief for publication and, its use for development management purposes</b>

### **Decision**

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**Recommendation: The Committee is recommended to:**

- I. Approve the post consultation Planning Brief for publication, and its use for development management purposes, subject to any comments of the Planning Committee being addressed (the wording of which is delegated to the Director of Planning in consultation with the Chair of the Planning Committee).**
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### **Executive Summary**

- A Planning Brief has been prepared for the Brooks Road area of Lewes to set out a coordinated approach to redevelopment in the area and guidance on key relevant issues, specifically; land use, design, climate change and movement and connectivity.
- The Planning Brief does not set new policy or allocate sites for development and should be read in conjunction with the adopted Development Plan for the area which comprises the South Downs Local Plan, the East Sussex Minerals & Waste Plan and the Lewes Neighbourhood Development Plan (NDP).
- The Planning Brief was subject to public consultation for 6 weeks from 20 October to the 01 December 2022. Feedback was received from a range of stakeholders including landowners, statutory consultees and local interest groups. The comments received have been considered by officers and minor changes made to the Planning Brief accordingly. The post consultation Planning Brief is presented to Planning Committee for approval and once published, will be a material consideration in making planning decisions relating to the Brooks Road area.

### **I. Background**

- I.1** In October 2022, Planning Committee approved for consultation, a draft Planning Brief for the Brooks Road area, in Lewes (**Appendix I – Map of Brooks Road Area**). The draft Planning Brief had been prepared in recognition that a greater level of change is happening in the area that would benefit from some clearer management. The Planning Brief sets out the approach to redevelopment and guidance on key relevant issues. This is a proactive way that the Local Planning Authority can influence development within the area and, once published, will be a key material consideration in the determination of planning applications.

- I.2 Much of the Brooks Road area is protected as a principal employment site under Policy SD35 of the South Downs Local Plan and identified on the Policies Map. This is the highest level of protection provided by the Local Plan for existing employment sites and requires the maximum period of marketing of eighteen months to support a change of use application. The supporting text to the policy states that ‘There are a small number of principal employment sites in Petersfield, Midhurst and Lewes, which are large-scale, good-quality employment sites providing jobs and services across a wide area. The National Park Authority supports the continued use of these sites for B Class employment and will resist development proposals for alternative commercial uses and housing.’ Furthermore, Policy HC4 of the Lewes NDP protects all employment uses and premises in the town.
- I.3 In recent years there have been several planning applications and enquiries for redevelopment within the area, including for mixed-use development. The Planning Brief sets out the following key development principles in line within the existing adopted policy framework:
- i. Enhanced employment provision
  - ii. A liveable environment compatible with surrounding uses, including residential that does not undermine employment uses and activity
  - iii. Incorporate and restore a network of naturally functioning watercourses and drainage ditches
  - iv. Retention of historic buildings and enhancement of their setting
  - v. Improved permeability and an appropriate walking and cycling environment
  - vi. Introduction of characteristic and multifunctional open spaces and vegetation in the public realm

## **2. Consultation on the draft Planning Brief**

- 2.1 Consultation on the draft Planning Brief ran from 20 October to 01 December 2022. The consultation was publicised on the SDNPA website and via social media. Hard copies of the draft Planning Brief were made available at Lewes Town Council offices and at the library in Lewes. Statutory consultees and local stakeholders, including landowners known to be progressing development proposals in the area, were notified by email. 19 responses were received, from a range of stakeholders including landowners, statutory consultees and local interest groups.
- 2.2 The key response themes are summarised as follows:

### **Lewes Town Council, Lewes District Council and East Sussex County Council**

- Welcome the Planning Brief and Lewes NDP featuring clearly within
- Strong support for retaining employment focus of the area
- Emphasise the importance of safe and connected pedestrian and cycle infrastructure
- Consider the relationship and impact of nearby developments e.g. Old Malling Farm
- Support for a 20mph speed limit in the area with appropriate traffic calming measures

### **Historic England, Environment Agency, Southern Water**

- When assessing potential impact on heritage assets (HA), assessment should include; all HA (designated & other assets), implications for setting of HA, potential archaeological interest, historic landscape character & historic settlement pattern
- Support for use of suitable Sustainable Urban Drainage and sustainable flood management
- Historical industrial uses and presence of source protection zone mean risks of pollution of groundwater will need to be carefully assessed before works proceed

- Support for green roofs, rainwater harvesting and trees for water management, as well as measures to harvest rainwater and/or recycle greywater where possible

#### **Local organisations and residents**

- Planning Brief welcome although concerns raised over prospect of more residential use in the area
- Any housing development should be focused on addressing affordable housing need
- A diversity of employment space is needed to support continued economic activity
- Local flood risk and need to ensure development is resilient to flooding
- Need to improve the pedestrian environment and area should have 20mph speed limit
- Clarification sought on permitted development rights

#### **Landowners and developers**

- Much of the Planning Brief is welcome and support for the aspirations of the Brief
- Objection to the proposal to retain the Malthouse building on Davey's Lane, which is in a poor state of repair and retains little of the original structure
- Challenge of renovating old industrial buildings to modern requirements and meet energy efficiency standards

2.3 The owner of the Malthouse on Davey's Lane and nearby site owners challenged the proposal to retain the building, asserting the building does not merit retention and impedes redevelopment of the site. The SDNPA Conservation Officer has been consulted on the Planning Brief and considers that the Malthouse, together with the grade II listed Old Brewery, characterise the historic brewery and industrial uses of the Brooks Road area, much of which has been lost. Whilst the physical fabric of the Malthouse has been altered over time (by the nature of its changing use), the building remains identifiable as an historic industrial building associated with brewing for over 150 years and makes a positive contribution to the Brooks Road area. The Conservation Officer considers the Malthouse to have local interest and as such, should be considered as a non-designated heritage asset (undesignated heritage asset) as defined in the South Downs Local Plan. Further details on the heritage value of the Malthouse have been included in the Planning Brief accordingly.

2.4 Following the public consultation, a revised Planning Brief has been prepared. The following changes have been made:

- Highlight the need to retain diverse employment activity in the area, through the provision of suitable floorspace
- Clarification that residential proposals should not undermine employment activity
- Support for co-ordination between landowners to deliver green / blue infrastructure, movement connections and place-making
- Additional information on approach to heritage assets
- Support for lower speed limit
- Support for tree planting, green roofs and rainwater harvesting for water management

The planning history has been updated along with factual corrections and some clarifications have been made to the illustrations contained within the Planning Brief.

2.5 A number of sites within the Planning Brief area have active planning enquiries. Landowners at these sites have been invited to a presentation from officers on the 01 February to provide an update on the Planning Brief, to explain its role and answer questions.

### 3. Next steps

- 3.1 Following approval by Planning Committee, the Planning Brief will be published. It will then be an important material consideration in making planning decisions relating to the Brooks Road area. The Planning Brief will be published on the SDNPA website and development management officers (including host authority officers) will notified of its publication.

### 4. Other implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	No
Does the proposal raise any Resource implications?	No – any work associated with the Planning Brief will be carried out internally.
How does this decision contribute to the Authority's climate change objectives	The Planning Brief identifies area-wide measures to adapt to climate change by improving the green and blue infrastructure and mitigation measures by improving walking and cycling provision to reduce car-trips.
Have you taken regard of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Yes - the Planning Brief supports improvements to the built environment to improve access for all. This will be considered further should planning applications come forward.
Are there any Human Rights implications arising from the proposal?	None
Are there any Crime & Disorder implications arising from the proposal?	The Planning Brief supports the orientation and layout of buildings to increase natural surveillance of public areas, in line with the principles of 'designing out crime'.
Are there any Health & Safety implications arising from the proposal?	None
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy?	The Planning Brief supports and encourages sustainable design, helping us to live within environmental limits.

## 5. Risks Associated with the Proposed Decision

### 5.1

Risk	Likelihood	Impact	Mitigation
The Planning Brief is seen as too prescriptive and stalls development	Low	Medium	The Planning Brief does not impose substantial additional requirements on developers but rather makes it clear what the Authority expects to see in the development of the area, using the adopted Local Plan as the starting point. Setting this out at an early stage gives clarity to developers and should make the planning application process (including pre-application discussions) more efficient.
The Planning Brief is interpreted as a weakening of Local Plan policy protecting employment use in the area	Medium	High	The Planning Brief does not set new policy and is clear that it needs to be read in conjunction with the adopted Development Plan. Key relevant policies in the South Downs Local Plan and Lewes NDP are highlighted.

### TIM SLANEY

#### Director of Planning

#### South Downs National Park Authority

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Appendices

1. Map of Brooks Road area boundary
2. Post Consultation Brooks Road Planning Brief

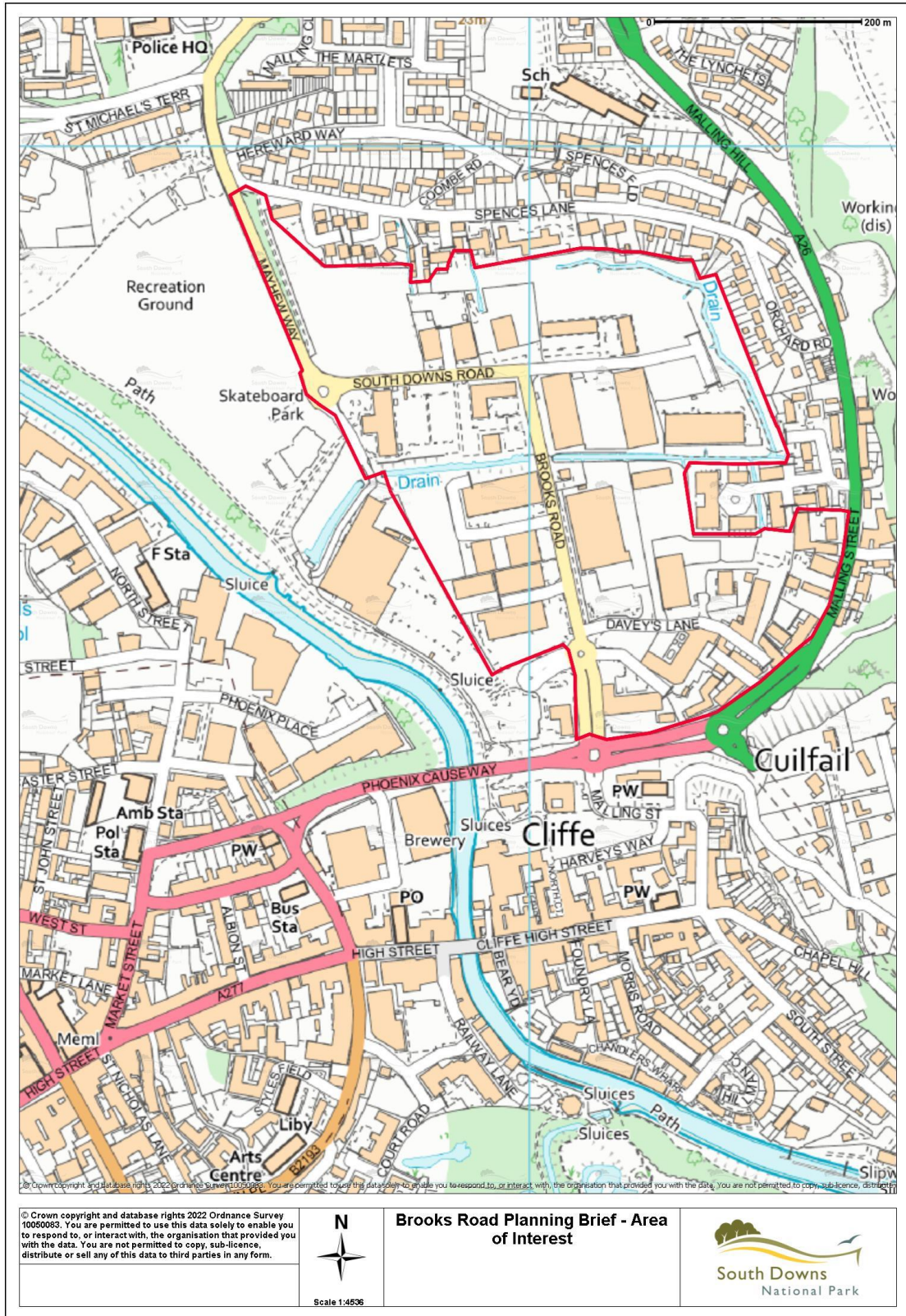
SDNPA Consultees Director of Planning; Monitoring Officer; Legal Services,

External Consultees None

Background Documents [Report to Planning Committee October 2022: Lewes Brooks Road Planning Brief](#)  
[Lewes Neighbourhood Development Plan 2015-2033](#)



Map of Brooks Road area boundary



Created by Amy Tyler-Jones on 22 March 2022





# BROOKS ROAD, LEWES

PLANNING BRIEF  
SOUTH DOWNS NATIONAL PARK

FEBRUARY 2023

South Downs National Park Authority  
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Midhurst  
West Sussex  
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# CONTENTS

<b>PART 1: EXECUTIVE SUMMARY .....</b>	<b>2</b>	<b>PART 6: LANDSCAPE CONTEXT .....</b>	<b>10</b>
1.01 ABOUT THIS PLANNING BRIEF .....	2	<b>PART 7: APPROACH TO REDEVELOPMENT.....</b>	<b>12</b>
1.02 PLANNING BRIEF VISION.....	3	6.01 LAND USE.....	13
1.03 KEY DEVELOPMENT PRINCIPLES .....	3	6.02 DESIGN PRINCIPLES.....	15
<b>PART 2: INTRODUCING THE BROOKS ROAD AREA .....</b>	<b>4</b>	6.03 CLIMATE CHANGE.....	18
2.01 AREA HISTORY.....	4	6.04 MOVEMENT AND CONNECTIVITY .....	20
2.02 AREA LAND USES & OWNERSHIP .....	4	<b>DEVELOPER CONTRIBUTIONS .....</b>	<b>22</b>
<b>PART 3: POLICY FRAMEWORK .....</b>	<b>5</b>	<b>CONCLUSION .....</b>	<b>23</b>
3.01 SOUTH DOWNS LOCAL PLAN .....	5	<b>APPENDICES</b>	
3.02 LEWES NEIGHBOURHOOD DEVELOPMENT PLAN.....	6	APPENDIX 1: KEY VIEWS .....	25
<b>PART 4: PERMITTED DEVELOPMENT RIGHTS.....</b>	<b>7</b>	APPENDIX 2: ILLUSTRATIVE LAYOUT .....	27
<b>PART 5: RELEVANT PLANNING HISTORY .....</b>	<b>8</b>	APPENDIX 3: GLOSSARY .....	28

# 1 EXECUTIVE SUMMARY



## 1.01 ABOUT THIS PLANNING BRIEF

The Brooks Road area, is part of the Central area of Lewes, which is protected as a principal employment site under Policy SD35 of the South Downs Local Plan and identified on the Policies Map. This is the highest level of protection provided by the Local Plan for existing employment sites and requires the maximum period of marketing of eighteen months to support a change of use application. The supporting text to the policy states that ‘There are a small number of principal employment sites in Petersfield, Midhurst and Lewes, which are large-scale, good-quality employment sites providing jobs and services across a wide area. The National Park Authority supports the continued use of these sites for B Class employment and will resist development proposals for alternative commercial

uses and housing.’ Furthermore, Policy HC4 of the Lewes Neighbourhood Development Plan (NDP) protects all employment uses and premises in the town.

In recent years there have been several planning applications and enquiries for sites within the Brooks Road area for redevelopment, including mixed-use development. In response, the SDNPA have prepared this Planning Brief in recognition that a level of change 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

The planning brief does not set new policy or allocate sites for development. It should be read in conjunction with the adopted Development Plan for the area which comprises the South Downs Local Plan, the East Sussex Minerals & Waste Plan and the Lewes Neighbourhood Development Plan. The Planning Brief has been prepared following an analysis of evidence, site visits and a stakeholder workshop to gather views and aspirations for the Brooks Road area.

The Planning Brief was subject to 6 weeks public consultation and post consultation changes were agreed by SDNPA Planning Committee on the 09 February 2023. The Planning Brief is a key material consideration in making planning decisions relating to the Brooks Road area.

## 1.02 PLANNING BRIEF VISION

Brooks Road will be an area that retains its role as a functioning and thriving employment centre with buildings and spaces between that are flexible, functional and of high environmental standards. Buildings will be fit for future needs and efficient in their use of resources and energy. Spaces between buildings will become an environment substantially enhanced for all, providing multiple benefits for climate change resilience, biodiversity, connectivity and public amenity. The Brooks Road area will also contribute towards thriving, prosperous and resilient communities in Lewes, and will be well integrated within and connected to the surrounding town.

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

‘There is strong support for Lewes to maintain its distinctive identity and for the town to avoid becoming a clone of many other historic towns across the nation without a manufacturing base. 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.’

## 1.03 KEY DEVELOPMENT PRINCIPLES

- Enhanced employment provision that better serves local needs
- A liveable environment compatible with existing immediate employment uses, i.e. residential use that does not reduce or compromise employment land uses and activity
- Incorporate and restore a network of naturally functioning watercourses and drainage ditches
- Retention of historic buildings and enhancement of their setting
- Improved permeability and an appropriate walking and cycling environment
- Introduction of characteristic and multifunctional open spaces and vegetation in the public realm.

# 2 INTRODUCING THE BROOKS ROAD AREA



The Brooks Road area is a large mixed employment area close to Lewes Town Centre, with residential areas to the north and east. To the west of the area are Tesco and Aldi supermarkets and Malling recreation ground which is adjacent to the River Ouse. Most of the area is a principal employment site safeguarded under Policy SD35 of the Local Plan. Brooks Road area is the second largest employment site in the National Park and one of only four protected principal employment sites providing large scale and good quality employment buildings benefitting, crucially, from infrastructure, both digital and road, that support jobs and services across a wide area. The existing green and blue infrastructure of the area, which is currently under-valued, has the potential to support natural processes and help adapt to climate change.

## 2.01 AREA HISTORY

Historically the Brooks area was the natural flood plain of the River Ouse, an area of wet grassland intersected by a series of drainage ditches, some of which are still apparent today. The South East corner of the area was the historical focus of the brewing industry in Lewes with the Southdown brewery on Thomas Street and the Malthouse on Davey's Lane. The area today consists of modern warehouses, retail units and office development, which largely date from the 1970's.

## 2.02 AREA LAND USES & OWNERSHIP

The area comprises the following land uses:

- Employment – comprising warehouse, storage & distribution e.g. Harvey's depot
- Trade counters – plumbing merchants & hardware stores
- Offices e.g. Sackville House & Caburn House
- Large format retail warehouses e.g. Majestic Wine, Homebase
- Royal Mail sorting office
- NHS fleet management & maintenance centre
- Recent residential permissions e.g. 41 dwellings at 6-8 Brooks Road, 79 dwellings at South Downs Road and four Passive House standard homes at land off Davey's Lane
- Brewery & taproom (Davey's Lane)
- Assembly & leisure (Kings Church, Brooks Road)

There is some public sector land ownership in the area (East Sussex County Council (ESCC), Lewes District Council (LDC) and NHS).

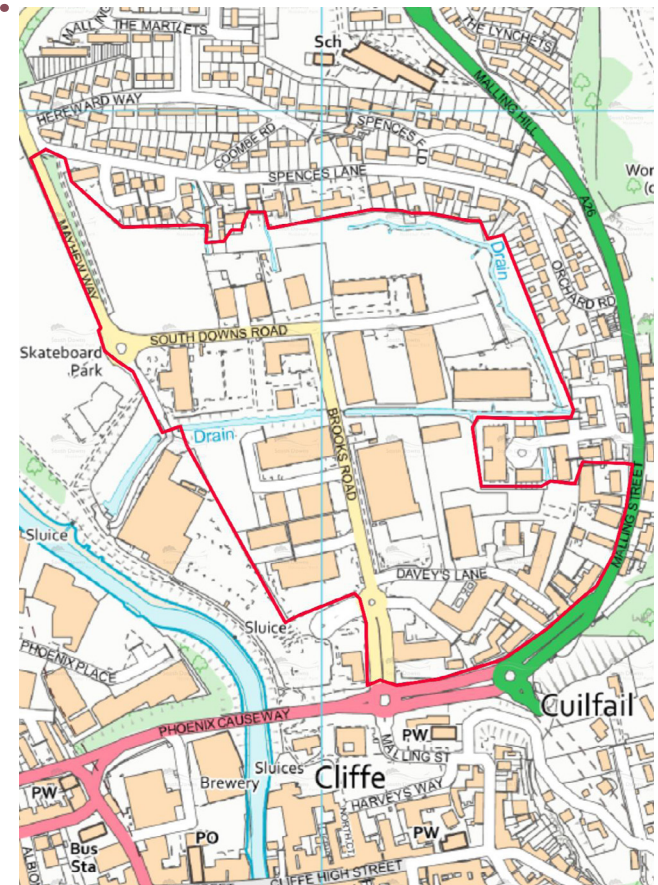


Figure 1: Brooks Road Planning Brief Area.

# 3 POLICY FRAMEWORK

The following documents provide the policy framework for the Brooks Road area, any development proposal coming forward will need to demonstrate how it complies with this policy. Whilst these documents should be read as a whole, key policies and allocations relevant to the area are highlighted below:

## 3.01 SOUTH DOWNS LOCAL PLAN

- Core of area is safeguarded principal employment site (Policy SD35)
- Malling Brooks employment site allocation (Policy SD77)
- Conservation and enhancement of the historic environment (Policy SD12)
- East of the area is Lewes Downs Site of Special Scientific Interest (Policy SD9)
- West of the area is North Street Quarter and Adjacent Eastgate Area strategic development sites allocated for a mixed use redevelopment (Policy SD57)
- South West of area is the Town Centre boundary (Policy SD36/SD37)
- South of the area is the Lewes Conservation Area (Policy SD15)

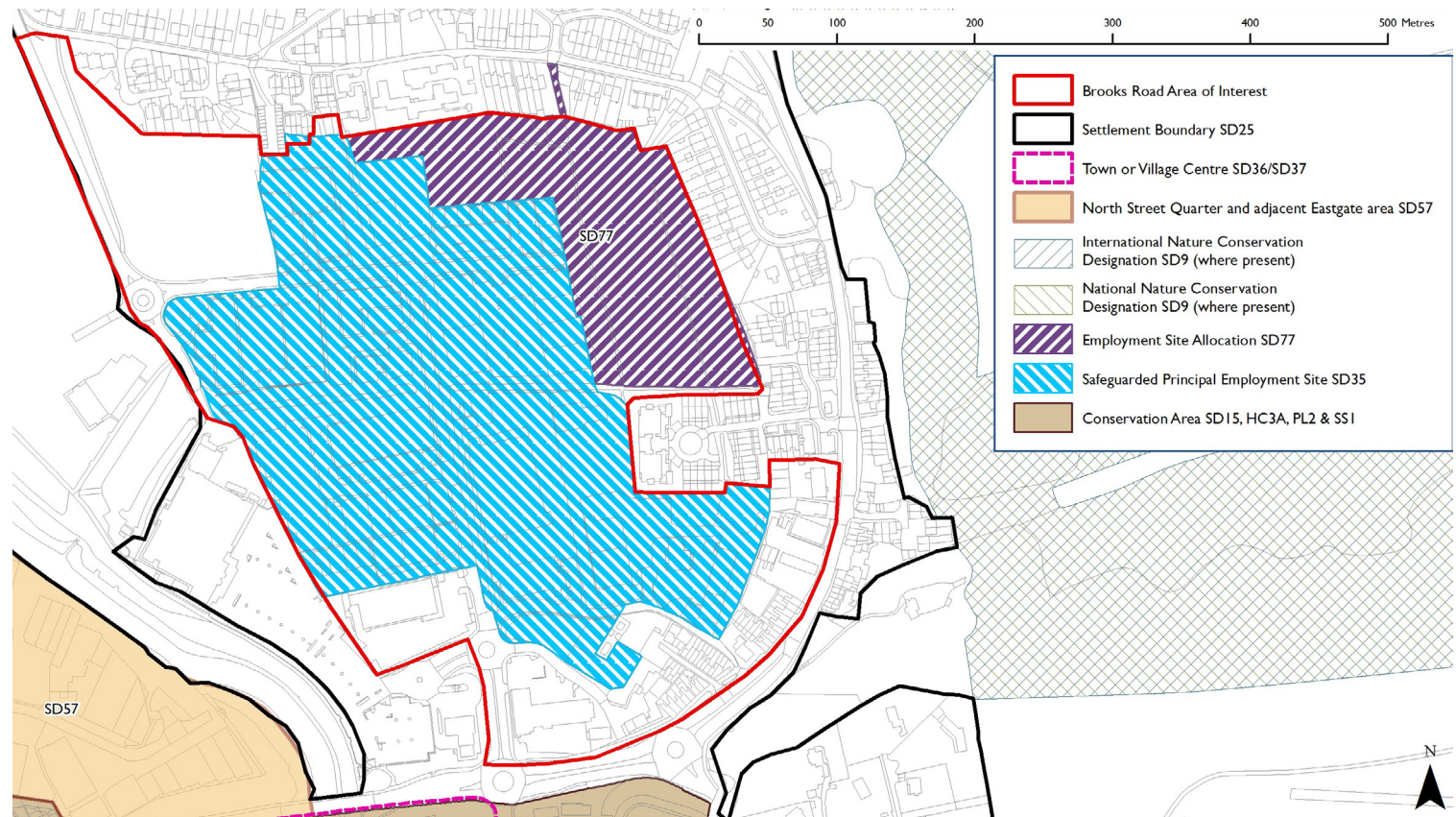


Figure 2: Policies Map, South Downs Local Plan 2014-2033.

### 3.02 LEWES NEIGHBOURHOOD DEVELOPMENT PLAN

- Policy HC4 The Working Town
- Existing cycle network along Brooks Road, South Downs Road & Mayhew Way (Policy SS1/SS2)
- Proposed enhanced green link from Malling Street to Phoenix Causeway (Policy SS1/SS2)
- Historic core of Lewes – southern section of Malling Street & Phoenix Causeway (Policy HC3a)
- Housing and office allocation at South Downs Road (PL1B26)
- To the east – Countryside Gateway (Policy SS1/SS2), Arrival Street (Policy SS1/SS2) and Locally Important Viewpoint (Policy HC3a)
- To the west – River Corridor Strategy (Policy SS4), Malling Recreation Ground – Local Green Space & Waterloo Bonfire site, Wetlands behind Tesco – Local Green Space (Policy SS3), Cycle Route (Policy SS1/SS2),
- To the south – locally important viewpoint to Harvey’s Brewery (Policy HC3a)

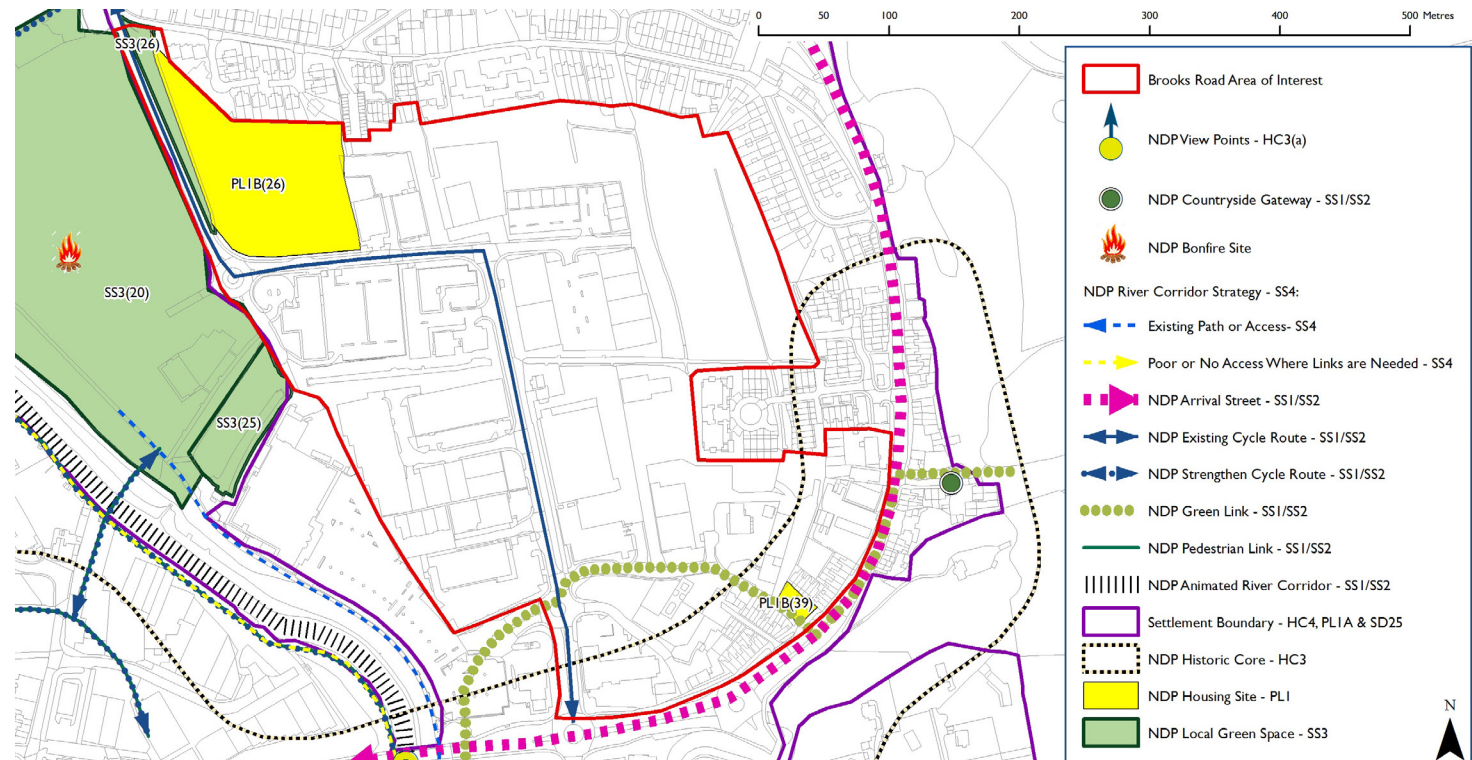


Figure 3: Policies Map, Lewes Neighbourhood Development Plan (2015-2033)

In addition, there are several Neighbourhood area-wide policies which will be pertinent to proposals in the Brooks Road area, these include but are not limited to:

- Policy PL1 A General Housing Strategy – including maximising the provision of Lewes Low Cost Housing and resisting the loss of identified employment land and premises in active employment use
- Policy AM1 Active Travel Networks
- Policy HC3 A Heritage Protection of Landscape and Townscape
- Policy LE1 Natural Capital
- Policy PL2 Architecture & Design - including use of flat roofs as green roofs and/or for solar power generation
- Policy PL3 Flood Resilience
- Policy PL4 Renewable Energy and the resource and energy efficiency of new buildings



## 4 PERMITTED DEVELOPMENT RIGHTS

Permitted development refers to types of work or change of use which can be undertaken without needing to apply for planning permission. Permitted development rights (PDR) which allow for a change of use from Class E (including offices and light industry) or Class B8 (storage and distribution) to residential do not apply in National Parks. PDR which related specifically to a change of use from office to residential use no longer apply, although some pre-2021 permissions have yet to be implemented. Change of use rights which allow for changes within Class E with up to 2 flats subject to prior approval, do apply in National Parks.



Figure 3a: Historic photo of the area from the Downs, showing historic brewery industry buildings.

## 5 RELEVANT PLANNING HISTORY



A number of sites have been the subject of planning decisions that have a bearing on future development in the Brooks Road area. There are also several applications in progress and a number of pre-application enquiries:

Address	Description	Reference	Status
Land at South Downs Road	79 dwellings and office space	SDNP/17/00387/FUL	Under construction
Malling Brooks	7,040sqm employment floor space with long stay car park	LW/12/0342	Part implemented
Malling Brooks	Construction of three commercial buildings for light industrial or warehouse/trade counter use (Class E or B8).	SDNP/22/03451	Planning application in progress
Land at Units 6-8 Brooks Road	41 dwellings and office / light industrial floorspace across 13 ground floor business units	SDNP/17/03100/FUL	Permission – under construction
Aldi House, Brooks Road	Replacement supermarket and reconfigured car park	SDNP/18/05206/FUL	Permission
Land off Davey's Lane	4 dwelling houses	SDNP/18/01235/FUL	Permission – under construction
Lewes Working Mens Club	Change of use from club to 2 dwellings	SDNP/20/04725/FUL	Planning application in progress
The Mallings Business Centre	Amendments to the facade of Block A and B of the Mallings Business Centre, including new cladding, windows, roof covering and the creation of a new enclosed staircase to Block A	SDNP/22/03189/FUL	Permission
Caffyns, Brooks Road	Proposal for assisted living and retirement living apartments	SDNP/17/03431/PRE	Pre-application enquiry
Land adjacent to Davey's Road	McDonalds restaurant and drive-through lane	SDNP/19/03583/PRE	Pre-application enquiry
The Malthouse, Davey's Lane	Mixed-use redevelopment with commercial space and 61 dwellings	SDNP/21/05639/PRE	Pre-application enquiry
Sig Roofing, Davey's Lane	Demolition of existing building and construction of three mixed-use buildings with 685m2 of commercial floorspace at ground floor level and 30 self-contained flats	SDNP/22/03867/PRE	Pre-application enquiry
Sig Roofing, Davey's Lane	42 dwellings and office space	SDNP/18/05183/PRE	Pre-application enquiry
Storage area, Sig Roofing, Daveys Lane	15 dwellings and ground floor commercial unit	SDNP/19/02642/PRE	Pre-application enquiry
The Malling Business Centre, Malling Street	Proposed changes of use of existing office space to provide dwellings	SDNP/21/03967/PA30 SDNP/21/03899/PA30	Pre-application enquiry

Storage Area, Davey's Lane	Construction of mixed-use development comprising 3 new commercial units (Use Class E), 4 self-contained flats and a single family house (C3). Proposals include private amenity space for all residential units together with natural landscaping and communal green space for use by employees and residents. Secure cycle parking, car parking and refuse/recycling storage to be integrated throughout the site.	SDNP/22/04721/FUL	Planning application in progress
The Malthouse, Davey's Lane	Outline application for the demolition of existing buildings and construction of mixed-use development comprising 12 new commercial units (Use Class E) and 48 self-contained residential units (C3). Proposals include private amenity space for all residential units together with communal green space and natural landscaping. Secure cycle parking, car parking and refuse/recycling storage to be integrated throughout the site.	SDNP/22/04692/OUT	Planning application withdrawn

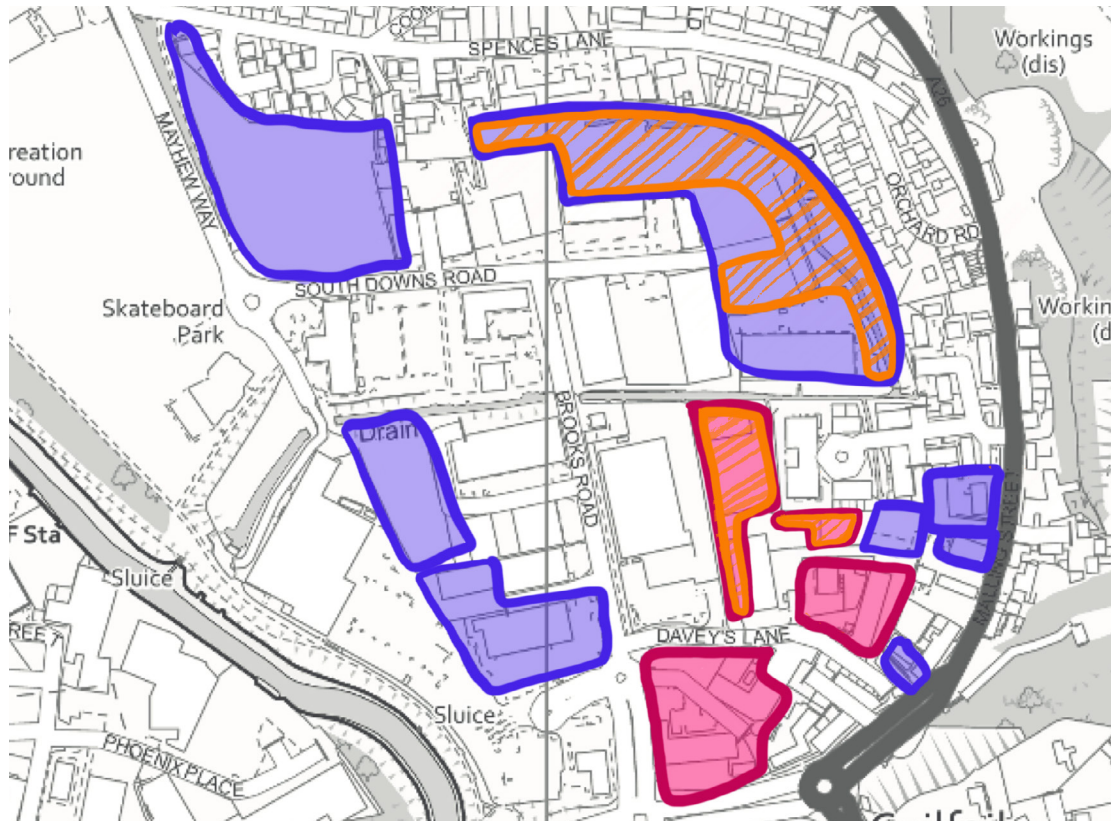


Figure 4: Map showing recent relevant planning history of the Brooks Road Planning Brief Area.  
 Legend: Blue (Planning permissions), Pink (Pre-application enquiries, Orange (Ongoing planning applications/enquiries)

## 6 LANDSCAPE CONTEXT



All development within the National Park is expected to conserve and enhance the landscape character in the National Park. This applies equally to the rural and built-up areas of the National Park. To achieve this, development is required to take a landscape-led approach to design, which means taking an evidence-based understanding of landscape (including buildings) to inform the design, scale and layout of proposals.

This Planning Brief provides an initial high level assessment of the landscape considerations for redevelopment within the Brooks Road area. Individual development proposals will be expected to undertake their own detailed evidence gathering and analysis to support any development scheme.

### LOCATION

Area is located at the eastern edge of Lewes on the River Ouse floodplain and at the edge of Mount

Caburn open downland (**See SDNP Landscape Character Assessment**)

### GEOLOGY AND SOILS

- Ouse Floodplain landscape character area
- Underlying river alluvium

### TOPOGRAPHY AND WATER

- The area forms part of the floodplain of the river Ouse.
- The area's context is formed by the river Ouse and the downland.
- The area itself is largely flat river plain with slightly higher ground within the west of the Planning Brief area
- Central watercourse bisecting area and smaller drainage ditches to north and south

### LANDSCAPE ELEMENTS

- Settlement & Buildings: Due to the area being flood plain, it has historically never been 'settled'. The land has in recent history been used for commercial development, large-scale low-rise buildings of poor quality, which bear little relationship to other elements of landscape.
- The pattern of (historic) routes, bear a strong relationship to the contours, running between the flood plain and the Downs. No routes ever existed within this site, but today routes have largely been imposed on the landscape with little acknowledgement of the landscape and the functions it performs.
- The fieldscape remains in part, perceptible at this site. Fields are marked by 'wet fences' - and ditches remain within this landscape in varied degrees of condition and acknowledgement from existing development.

In the absence of roads and buildings (historically) this landscape is strongly characterised by the patterns of this surviving field system.

- The floodplain is typically not characterised by significant tree cover, but often trees as linear groups mark the break in contour between the floodplain and valley sides. Here trees have grown up incidentally, as land has fallen out of use, so whilst not strictly characteristic of this landscape they are likely to be important for other benefits.
- The perceptual qualities of the floodplain stem from the other elements - simple topography, open spaces and lack of significant vegetation

and the simplicity which results from it, affording views and sense of space, and relationship to the river via views and characteristic vegetation. Clearly this has all been significantly undermined here. The visual connection with the downland setting is also critical to sense of place across Lewes and particularly here, which is interrupted today by some taller buildings. The downland is also within a relatively short walking distance.

### HABITATS

- Woodland and chalk grassland to the East at Lewes Downs Site of Special Scientific Interest
- Nearby areas of woodland

- Network of ditches provide wet and dry habitat
- Area is identified as habitat network enhancement zone 2 where the delivery of suitable green infrastructure can help counter the effects of habitat fragmentation.
- Lewes Railway Land Local Nature Reserve to the south is an example of floodplain habitat

### PEOPLE AND WILDLIFE

- Malling Brooks area of scrubland and ditches
- Limited public access to watercourse currently
- Nearby access to Lewes Downs



Figure 5: OS 25 Inch 1841-1952, reproduced by permission of CC-BY-NC-SA overlaid aerial photography.

Figure 6: Old photograph of the flood plain and the Malthouse.

# 7 APPROACH TO REDEVELOPMENT



The following sections of the planning brief address four key issues important to development proposals in the Brooks Road area. These are land use, design, climate change and movement and connectivity. These issues have been identified as important to the area through a review of policy and local evidence and through stakeholder engagement. For each key issue, challenges and opportunities are listed as well as a way forward in the form of key development principles.



Figure 6a: Illustrative sketch layout of the redevelopment of the area (See appendix 2).

## 6.01 LAND USE

Maintaining Lewes as a working town is highly important locally and for the wider National Park. The town has a rich history of both manufacturing and creative industry and there continues to be strong demand for industrial and creative employment space in Lewes. Most of the Brooks Road area is safeguarded for employment uses and retaining and making best use of areas like Brooks Road is critical as there is little scope to create new employment areas in the National Park given the landscape constraints.

There is also an acute affordable housing need in Lewes, and with limited opportunities to expand the town beyond the existing built-up area, it is imperative to make best use of land within the town. Redevelopment in the Brooks Road area could potentially repurpose the employment provision for future needs with residential development, which could create a sensitive mix of a living and working environment.

### CHALLENGES

- Neglected drainage infrastructure and flood risk
- Loss of jobs
- Reduction in job density to such an extent that the area is no longer the working core of the town
- Compatibility or otherwise of industrial / commercial activity with residential use
- Poor public realm designed around vehicle movement and little provision for walking or cycling

### OPPORTUNITIES

- Central location and close proximity to Lewes High Street and the River Ouse corridor
- Good transport links both by rail (railway station within walking / cycle distance), bus and road (Malling St. heading north and A27 to south of town)
- Underutilised land (large storage and car parking areas) as well as some vacant sites
- Manufacturing tradition of Lewes with some surviving references to the brewing heritage still present in the area
- Links to nearby universities and inward investment from Brighton economic area
- Shift since the pandemic to more local working and reduction in commuting
- Some increase in density could offer opportunity for vertical mix of uses



Figures 7 and 8:  
 Left: Workshop in Uckermark - Thomas Kröger Architekten  
 Right: Joinery near Freising - Deppisch Architekten

## WAY FORWARD AND KEY LAND USE PRINCIPLES

**6.1.1** Redevelopment which provides enhanced employment floorspace and retains diversity of employment uses will be supported. New employment floorspace should meet the needs of the town; with the following uses encouraged (identified through engagement with Lewes District Council and Lewes Town Council);

- Space for manufacturing, production and light industry
- Affordable workspace & space for start-ups
- Modern, flexible and energy efficient industrial warehouse
- Creative studios or craft workshops
- High-tech business space
- Enhanced heritage assets with flexible employment space

**6.1.2** Given the Lewes NDP emphasis on retaining a manufacturing base, and the tradition of craft and production

in the town, the expansion of retail, storage or distribution uses are not generally supported. Parking or other ancillary space will not be counted as employment space.

**6.1.3** Any proposed net loss in employment space will need to provide robust evidence that the existing building is no longer fit-for-purpose, complying with the requirements of SDLP Policy SD35 and Appendix 3 and Policy HC4 of the Lewes NDP;

**6.1.4** Where residential use is included as part of a proposal, redevelopment will need to create a comfortable living environment, avoid conflicts with surrounding uses and amenities and maximise the provision of affordable homes including Lewes Low Cost Housing.

**6.1.5** The SDNPA supports employment uses that do not lead to high traffic and generates many vehicle movements.

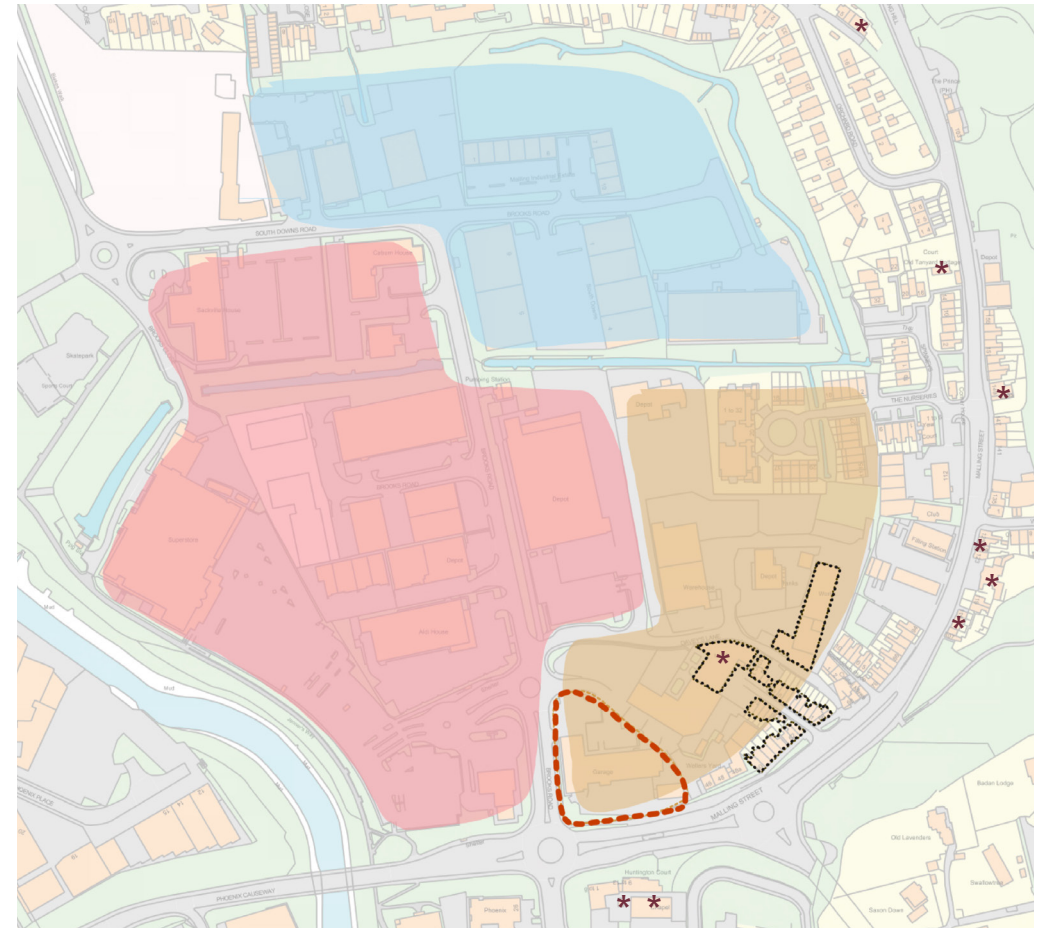


Figure 9: Map illustrating uses, gateway and historic buildings. Legend: Blue (Core employment area) Pink (Mixed employment area including retail & distribution) Light brown (Mixed employment / residential) Black dash (historic core) Orange dash (gateway / opportunity site) Brown star (listed buildings)



## 6.02 DESIGN PRINCIPLES

The Brooks Road area has been developed for industrial and commercial uses, with infrastructure and highways organised around the needs of these activities. The legacy of this is an area with a poor and hostile public realm dominated by vehicles and neglected Green (includes blue) Infrastructure. This section considers the key design challenges and opportunities for the area and sets out guiding principles in regards to layout, scale & form, materials, heritage assets and the public realm.

A series of key views of the area and the surrounding downland have been identified as relevant in any visual impact assessment and must inform development proposals. **Appendix 1** identifies some key views of the area, but these are non-exhaustive.

### CHALLENGES

- Water management
- Poor quality public realm for people
- Poor architectural quality, with some exceptions such as the eastern end of Daveys Lane
- Lack of trees and vegetation
- Extensive areas of hard surfaces
- Lack of open spaces
- Relationship with and integration to existing development, in particular historic routes and buildings
- Limited space and narrow lanes
- Historic buildings (can also be an opportunity)
- Potential archaeology
- Potential land contamination

### OPPORTUNITIES

- There is scope for a more efficient use of land and compact development in this sustainable location
- Car free or low levels of parking provision if active travel and non-motorised user connections to the town centre are improved
- Enhance existing and design new views of the Downs and landmarks that contribute to a sense of place
- Contemporary architectural design
- Buildings and spaces that adapt to a variety of uses and activities
- Improved sense of safety through natural surveillance
- Increase street trees for microclimate regulation, amenity, biodiversity, water management and cleaner air
- Reuse and recycle existing buildings and hardstanding materials (e.g. concrete and metal sheets)
- Subdivide large plots and create finer urban grain better reflecting the character of the Brooks and town
- Create attractive streets and open spaces. Lively streets that are safe and support people interaction.
- Repurposing water infrastructure for other benefits whilst restoring character and contributing to a positive, landscape-related sense of place.
- Maximising the use of roof space for either non-reflective solar panels or as green roofs providing water management, biodiversity and landscape amenity benefits.

## WAY FORWARD AND KEY DESIGN PRINCIPLES

The delivery of suitable employment space, building layouts, Green and Blue Infrastructure, movement networks, continuous active streets and places in general depends on the coordination of land-owners. The SDNPA expect that landowners work together to deliver good quality coordinated schemes that result in benefits to the wider area.

### LAYOUT

**6.2.1** Layout design should positively respond to the historic ditch/brooks network as a key historic and landscape element in the landscape-led approach to design. These should influence the future layout of the area and be incorporated into the Landscape Strategy and ultimately into the public realm.

**6.2.2** In the historic core, layouts should positively respond and integrate with the locally characteristic pattern of the settlement/grain.

**6.2.3** Development proposals shall conserve and enhance existing views and vistas, including views of the Downs and sequence of views along routes (e.g. Davey’s Lane). See **Appendix 1**.

**6.2.4** Compact forms of development are welcome. Layouts should be efficient and avoid spaces without clear function.

### SCALE AND FORM

**6.2.5** In some areas there may be scope to increase density, taking into account changes in topography across the area. Nevertheless, the maximum height of buildings shall be restricted by views and sympathetic relationship with neighbouring buildings and spaces, both in

terms of amenity and townscape character. Particular consideration shall be given to the views in **Appendix 1**.

**6.2.6** Proposals for buildings that are adaptable to changing needs and technologies, including alternative uses, are welcome and all development will need to be adaptable to climate change impacts including flooding, extreme rainfall events and overheating.

**6.2.7** The scale and mass of building will be constrained by existing views and sequence of views along routes. Therefore, new buildings and spaces between buildings shall be designed to retain views and vistas of the Downs and key town landmarks. Opportunities to create new framed views through development shall be explored and maximised where possible which may include new landmark buildings and spaces. Particular attention should also be given to roof form and materials to conserve views into the area.

### ARCHITECTURAL APPEARANCE AND MATERIALS

**6.2.8** Contemporary and traditional designs are supported, when complementing the existing town character and contributing to the special qualities of the area. Regardless of contemporary or traditional, designs should enhance local character and standard building types and mediocre imitations/replications will not be supported.

**6.2.9** Use of high quality traditional materials found in Lewes (flint, clay tiles, red bricks, etc.) is supported.

**6.2.10** Contemporary materials are supported when they integrate well in the area and have a high sustainability credential (e.g. Timber as structural and cladding material).



Figures 10, 11 and 12:  
Top: Garage and vehicle workshop in Andelfingen - Lüchinger + Meyer Bauingenieure AG. Middle: Workshop Building in Mechelen - dmva. Bottom: Accordia, Cambridge - Mole Architects

## HERITAGE

**6.2.11** Thomas Street and Davey’s Lane are sensitive areas in heritage terms. The grade II listed Old Brewery Building (Aka Registered Offices of EO Culverwell) and the non-designated heritage assets: Malthouse (Davey’s Lane) and the Thomas Street terraces, make a positive contribution to the industrial character and history of the area and therefore shall be retained. Re-use and adaptation of existing buildings will be supported when enhancing and better revealing their significance.

**6.2.12** The setting of Listed Buildings needs enhancement.

**6.2.13** There is evidence suggesting potential World War II Allotments associated with the Dig for Victory campaign. If development takes place within the Planning Brief Area, this matter should be investigated and considered as a historic element in the landscape-led approach to design.

## PUBLIC REALM

**6.2.14** High quality public realm\* and open spaces shall be provided in support to all uses and should be guided by these principles:

- a) Contribute to a diversity of open spaces that support a variety of activities and a memorable sense of place.
- b) Support a variety of uses (business, homes) and people (workers, residents and visitors) in the vicinity.
- c) Improve water management (water quality and quantity), and being part of the Blue Infrastructure network.
- d) Contribute to cleaner air and tranquillity, mitigating air and noise pollution from roads and existing uses.
- e) Contribute to rich and varied biodiversity and integrate into the Green Infrastructure network.
- f) Open spaces should be resilient to climate change, avoiding spaces that overheat.
- g) Spaces should be safe without the need for additional security measures.
- h) Spaces should be inclusive, accessible, fit for purpose, multifunctional (e.g. providing opportunities for food growing) and encourage social interaction.

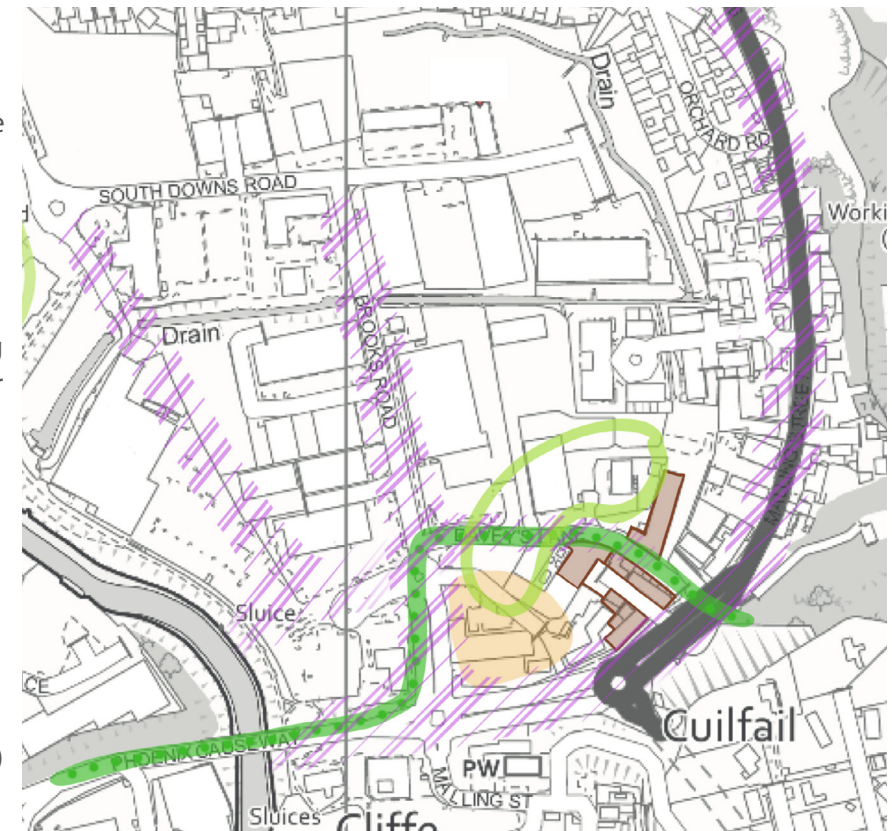


Figure 13: Map illustrating some key design principles. Legend: Dark green (green corridor/link NDP), Light green (opportunity to enhance/create open spaces), Purple trident (key routes that would benefit from placemaking and overall public realm improvements), Light brown (gateway/key site area), Dark brown (heritage assets).

\*Public realm is outside spaces in private and public ownership, including car parks, turning areas, services and utility areas and spaces supporting play, recreation, sport, movement (motorised or not). The above principles should be read together with sections C.7 Public Realm and C.8 Parking & Services of the adopted Design Guide SPD (2022).

## 6.03 CLIMATE CHANGE

Most of the Planning Brief area falls within Flood Risk Zones 2 and 3, where there is a risk of river flooding. There are also areas of localised surface water flood risk, especially to the west of Brooks Road. The area is not currently well adapted for climate change impacts (flooding & overheating) but there are opportunities to improve resilience to climate change by enhancing the local green infrastructure, primarily the network of drainage ditches and other measures including sustainable urban drainage, tree planting and green roofs. These measures will also create improvements for biodiversity as well as a more liveable and attractive environment for people working or living in the area.

The following challenges and opportunities in regards to climate change for the area have been identified:

### CHALLENGES

- The area is subdivided into plots that range in size and ownership, which to date has precluded a strategically connected network of Green and Blue Infrastructure.
- Existing watercourses are not well integrated within adjacent developments.
- Watercourses are underperforming with regards to water flow and water quality management.
- There is an excessive presence of hard surfaced areas and an absence of vegetation. There are few trees or shade available.
- Dependency on car use.

### OPPORTUNITIES

- Enhance the existing central watercourse, to maximise its function to reduce flood risk, to create a green corridor opening it up to the public and provide appropriate tree planting (e.g. willow & alder).
- New Green Infrastructure (GI) joined-up with the existing GI feature along the central watercourse.
- Incorporation of green roofs and walls to complement GI networks where on-ground solutions are not possible.
- Improve GI connectivity to Malling Down area, local green spaces and the River Ouse.
- Adequately maintain and manage existing watercourse and ditch network for the multiple functions it needs to provide.
- Design drainage systems that contribute to clean surface water that discharges into the River Ouse from urban areas, including industrial sites.
- Improve connectivity for active travel and reduce car use
- Opportunity to contribute to lower carbon emissions and deliver zero carbon developments e.g. onsite renewable energy generation.
- Create spaces that can function as climate shelters and mitigate the effects of excessive heat on people.
- The Environment Agency's pump on the watercourse could play a significant role on flood management. Collaboration with the Environment Agency may be necessary.

## WAY FORWARD AND KEY PRINCIPLES

**6.3.1** Ground floor uses compatible with the level of flood risk with consideration also given to safe access and egress to the site during a flood event. More vulnerable uses such as dwellings are not permitted in flood zone 3a unless the Exception Test is passed. **NPPF Annex 3** sets out flood risk vulnerability classification and should be read in conjunction with Planning Practice Guidance **Table 2:** Flood risk vulnerability and flood zone ‘incompatibility’ (Paragraph: 079 Reference ID: 7-079-20220825).

**6.3.2** Development proposals should incorporate and restore existing watercourses and ditches within the Planning Brief Area. This would include to reinstate ditches to surface and maximise biodiversity and landscape amenity benefits.

**6.3.3** SuDS systems should: a) be designed in consideration of

groundwater flood risk, and b) maximise opportunities for improving water quality.

**6.3.4** Sustainable flood management that is compatible with character of the floodplain and the historic ditch network.

**6.3.5** Wildlife connectivity should be ensured through the avoidance of fencing that would stop the permeability of Green Infrastructure and other structural corridors (green and blue).

**6.3.6** Buildings and spaces in between should be designed to adapt well to a changing climate (e.g. extreme rain events, extreme heat, etc.), through passive design and nature-based solutions. The use of trees, green roofs, grey water recycling, rainwater harvesting for water management are welcomed.



Figure 14: Map showing Green and Blue Infrastructure strategy. Legend: Dark Green (green corridor/NDP link) Light Green (existing green infrastructure to be enhance and proposed new green infrastructure) Blue dash (new blue infrastructure)

Figures 15 and 16:  
Left: Camley Street Natural Park, London - Argent  
Right: Development poorly integrated with watercourse.



## 6.04 MOVEMENT AND CONNECTIVITY

The area is bisected by Brooks Road, where the speed is limited to 30mph and runs north to south connecting Mayhew Way, South Downs Road and the residential areas to the north with the Phoenix Causeway. The other main route is Mallings Street, which is a busy primary and long-distance route managed by Highways England, forming the eastern boundary of the Planning Brief Area. Brooks Road functions as the main route for HGVs and other vehicles in and out the industrial estate. This route is also used by buses and emergency services (e.g. Sussex Police, Church Lane). Most industrial and commercial units have an adjacent car park within private ownership.

The following challenges and opportunities in regards to movement and connectivity for the area have been identified:

### CHALLENGES

- Lack of permeability within the Planning Brief Area and through the East-West axis.
- Brooks Road and Mallings Street are busy roads: traffic includes HGVs, buses and emergency vehicles. This results in air and noise pollution.
- Need to take into account nearby development (e.g. Old Mallings Farm)
- Large vehicles manoeuvring and parking space requirements.
- Existing uses currently generate high parking requirements.
- Missing pedestrian route on east side of Brooks Road.
- Numerous barriers on existing pedestrian routes: steps, kerbs, crossings, vehicular accesses, etc. Pavement not adequate for push chairs, wheelchairs, etc.
- Brooks Road speed limit is 30mph, whilst most of the town is 20mph.
- Car-centric public realm and excessive presence of car parks in private ownership.
- Poor on-street parking over pavements.
- No crossings for pedestrians where there are clear desire lines.
- Existing roundabout layout which present navigation challenges for pedestrians, cyclists and vehicles.

### OPPORTUNITIES

- Lower speed limits to 20mph.
- Traffic-calming opportunities at Mallings Street, Brooks Road and Phoenix Causeway to reduce environmental and amenity impacts from traffic.
- Increase west-east and town centre non-motorised connections.
- Improve pedestrian and cycle movement along Brooks Road.
- Improve junctions and roundabouts at Tesco, Brooks Road and Phoenix Causeway, facilitating navigation and pedestrian and cycle movement.
- Remove barriers and improve accessibility for all.
- Reduce car dominance of public realm and remove on-pavement parking.
- Ringmer to Southease cycle route skirts the edge of area along Mayhew Way and the riverside path.
- Make cycle and pedestrian routes continuous and connected with the wider network.
- Facilitate active travel with safe and convenient infrastructure and facilities.
- Facilitate quick and easy access to HGVs.

## WAY FORWARD AND KEY PRINCIPLES

- 6.4.1** Create a joined-up network of pedestrian routes that connect the area within the red line as well as with the surrounding town with links to the town centre, open spaces and links to nearby residential areas.
- 6.4.2** Create cycle and pedestrian network segregated from routes of heavy traffic (e.g. Brooks Road).
- 6.4.3** Provide adequate vehicular infrastructure for businesses' logistics (movement and parking for loading, deliveries...) that is fit for purpose and compatible with the pedestrian environment.
- 6.4.4** Active travel facilities integrated in all developments (e.g. secure cycle storage, showers, changing room, etc.). Travel Plans should support design proposals, as a means to mitigate traffic impacts on large scale developments.
- 6.4.5** Design highways for low speeds, increasing frontage development, changing the road design and layout and creating a sense of place.
- 6.4.6** Provide pedestrian crossings or shared surfaces where appropriate.
- 6.4.7** There is support to low/zero parking provision, where feasible transport alternatives are demonstrated. Developments should be accessible for all and facilitate active travel.

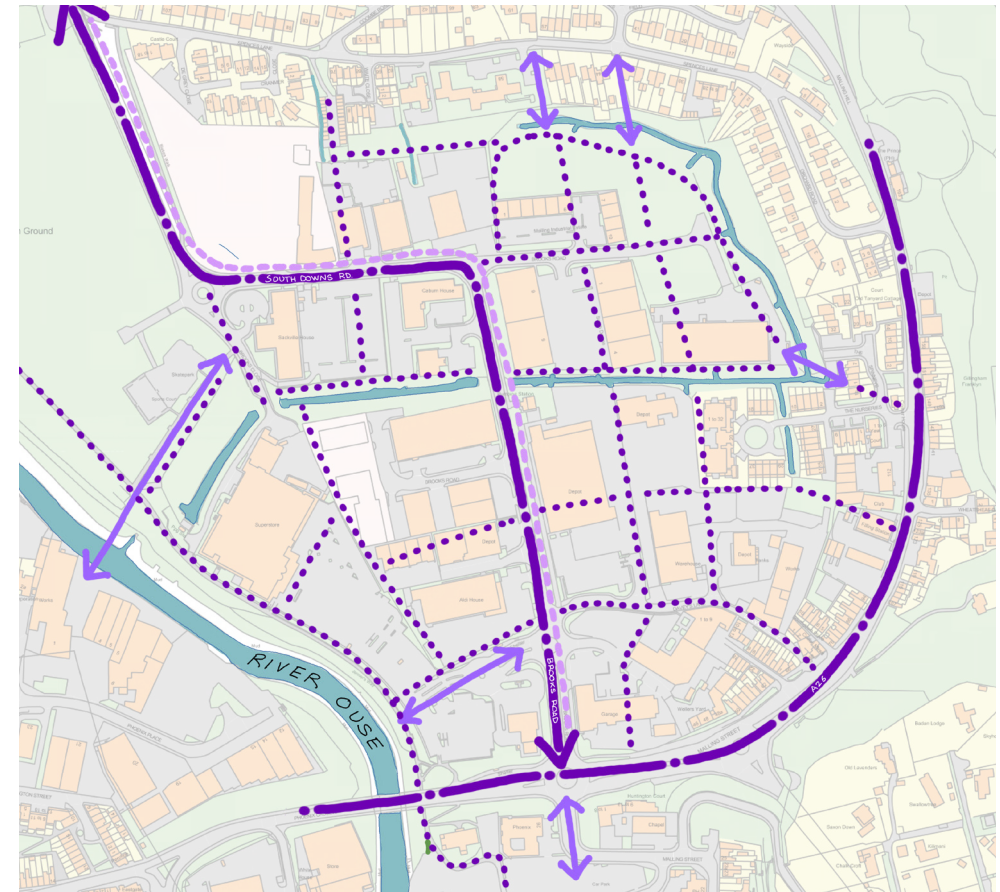


Figure 19: Map showing movement and permeability strategy. Legend: Dark purple: main spine N-S route (including for cycle and pedestrians), medium light purple arrows: opportunities for improved connectivity/permeability to surroundings. Purple dash: secondary routes to create a permeable grid along Green and Blue Infrastructure.

Figures 17 and 18:

Left, top: Street parking on pavement

Left, bottom: Pedestrian routes with obstacles



# DEVELOPER CONTRIBUTIONS



Developer contributions will be prioritised towards the following improvements:

- Cycle lane along Mayhew Way – South Downs Road - Brooks Road route and improvements to associated roundabouts.
- Pathway and accessibility improvement along Brooks Road.
- Traffic calming schemes and improvements to the pedestrian environment on Brooks Road, Malling Street and Phoenix Causeway.
- Open space, public realm and green link contributions



# CONCLUSION



The South Downs National Park Authority (SDNPA) has produced this planning brief to set out the Authority's expectations for development proposals in the Brooks Road area, Lewes. It is intended to provide guidance to potential developers and to give increased certainty to the local community and all relevant stakeholders. The Brief contains a series of development principles which should be incorporated into the earliest stages of the design process.

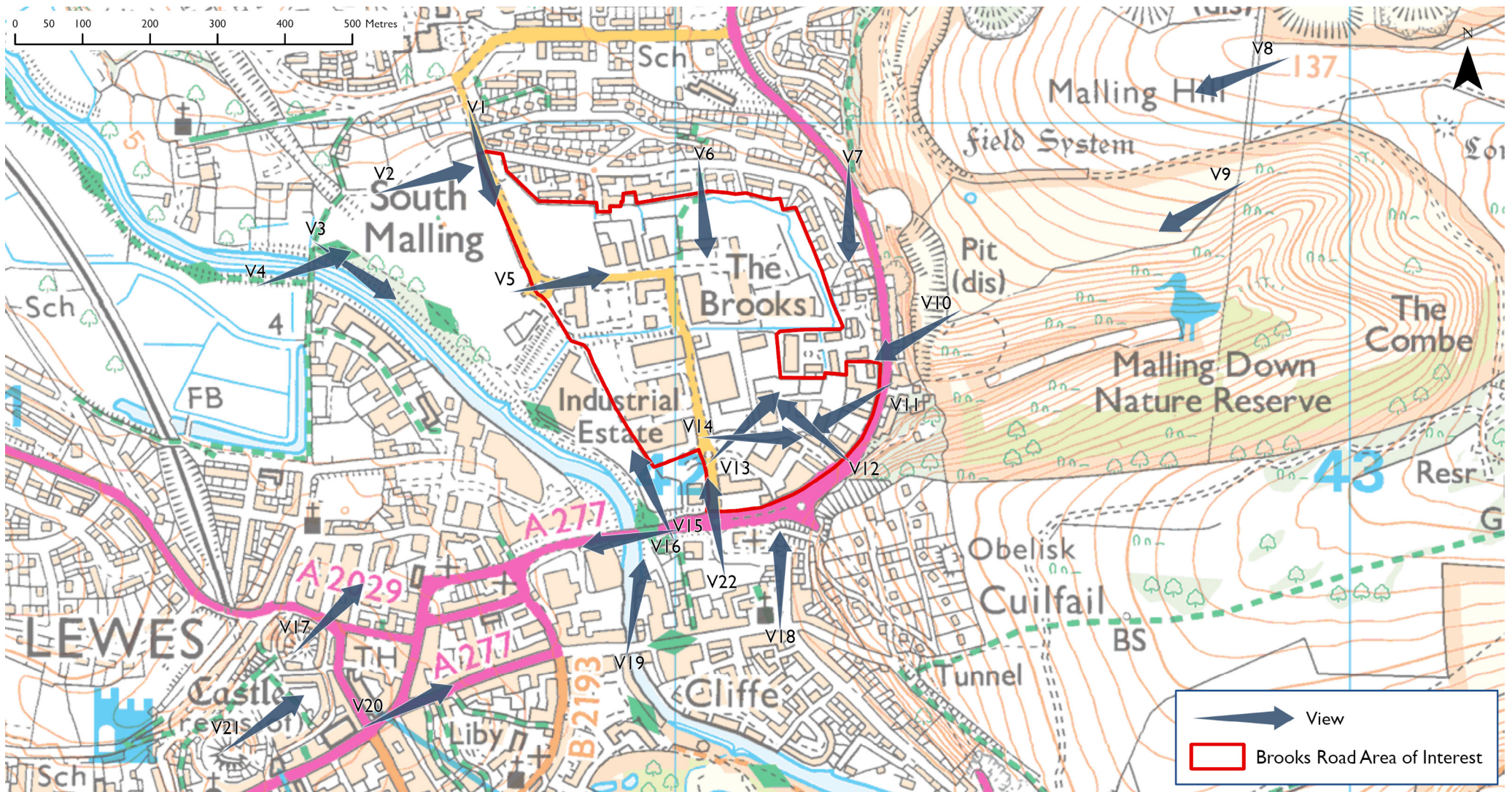
An illustrative sketch is provided in **Appendix 2**, providing an example of the key principles set out in this Brief and how they will shape the design process. This is not a final proposal, but an interpretation of how key principles in the Brief inform layout design. Additional evidence gathered at design stage would contribute to define layout and building design in a planning application.

In addition to using this document, applicants are encouraged to use the pre-application advice service from the SDNPA and undertake early engagement with key stakeholders in the area, including Lewes Town Council, Lewes District Council and East Sussex County Council.

If you have any questions about this Planning Brief please contact: [planningpolicy@southdowns.gov.uk](mailto:planningpolicy@southdowns.gov.uk)

# APPENDICES

## APPENDIX 1: KEY VIEWS



LEGEND: Non-exhaustive list of key views in and out of the Planning Brief Area. List of views on next page.

## APPENDIX 1: KEY VIEWS

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View V1 – Mayhew Road towards south

View V2 – From dismantled railway, Recreation Ground towards east

View V3 – River Ouse from north to south

View V4 – From North Street Quarter and River Ouse

View V5 – From Recreation Ground to east

View V6 – From Spences Lane and high ground north of the area

View V7 – From Malling Hill Road and footpath

View V8 – From Malling Hill

View V9 – From Malling Hill towards allotments

View V10 – From Malling Hill over chalk pit edge

View V11 – Malling Street

View V12 – From Davey’s Lane (east)

View V13 – From Davey’s Lane (west)

View V14 – From Brooks Road out to the downs

View V15 – Ouse River east banks

View V16 – Phoenix Causeway

View V17 – Castle Gate and surroundings

View V18 – Cliffe High Street towards north

View V19 – Cliffe High Street / Ouse River bridge to the north

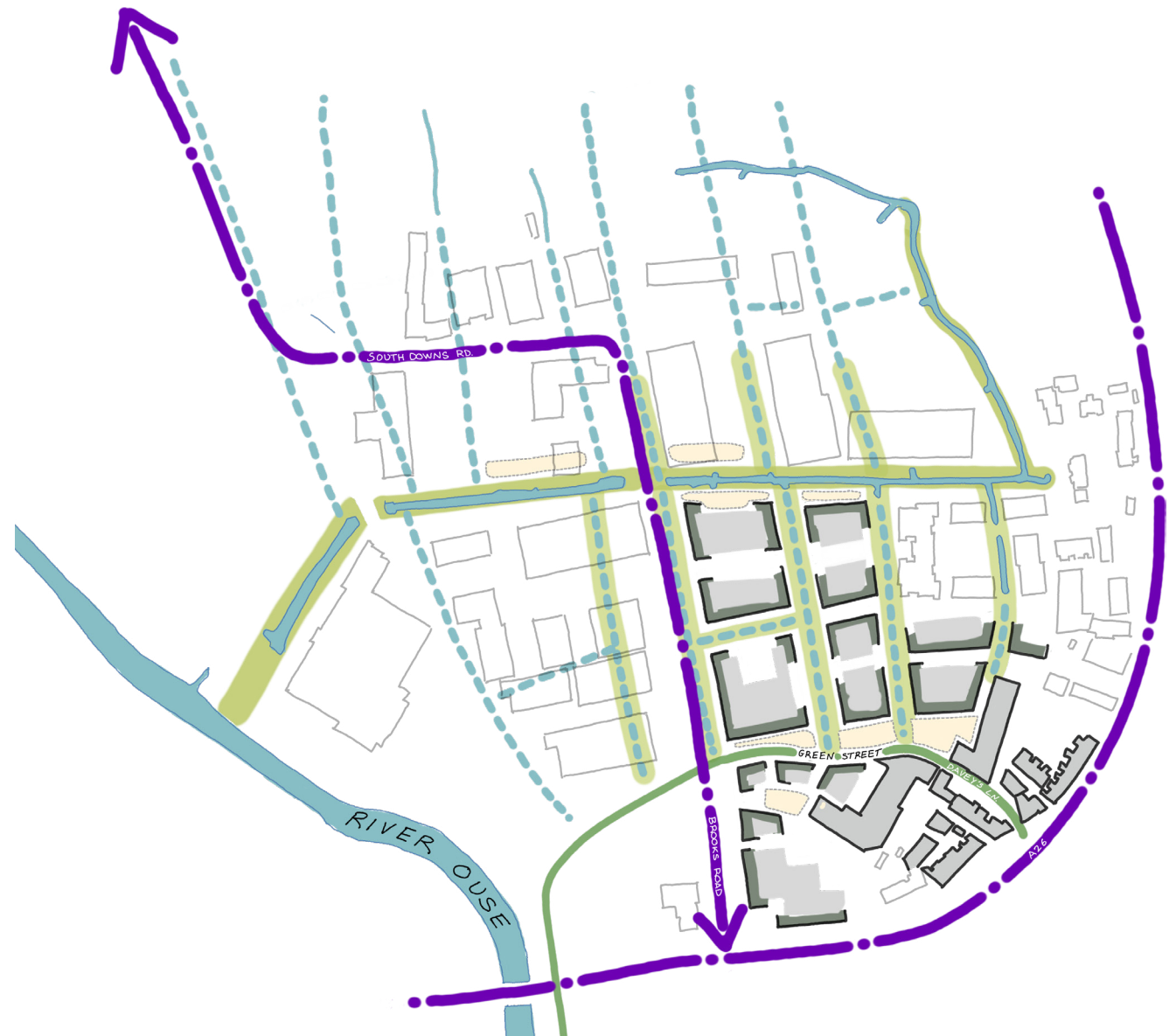
View V20 – High Street

View V21 – Lewes Castle

View V22 – From Phoenix Causeway and car park to the north

## APPENDIX 2: ILLUSTRATIVE LAYOUT

This sketch provides an example illustrating some of the key principles set out in this brief and how they will shape the design process. This is not a final proposal, but an interpretation of how key principles in the Brief inform layout design. Additional evidence gathered at design stage would contribute to define layout and building design in a planning application.



LEGEND: Purple arrows: Main vehicular routes.  
 Light green: Existing and new Green Infrastructure.  
 Dashed blue lines: Blue Infrastructure, a SuDS system connected to the ditch network. Dark green: Green street with vegetation as per the LNBP. Beige: areas with potential for public realm/open space. Dark grey: Built form with active frontages facing Green and Blue Infrastructure and public realm.

## APPENDIX 3: GLOSSARY

### **Blue Infrastructure**

Networks, or features within a network which relate to water, these include rivers, streams, ponds and lakes. These are typically considered, designed and managed within the definition of GI

### **Exception Test**

A requirement for development that is highly vulnerable and in flood zone 2 or essential infrastructure in flood zone 3a or 3b or more vulnerable in flood zone 3a. The exception test shows how flood risk will be managed in a proposed site.

### **Green Infrastructure (GI)**

A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

### **Heritage assets**

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Includes both designated and undesignated heritage assets.

### **Lewes Low Cost Housing**

Defined in the Lewes NDP as the maximum cost affordable on the average Lewes salary whether for sale or rent.

### **Passive House**

A very well insulated, virtually airtight building that is primarily heated by passive solar gains and internal heat gains from occupants

### **Public realm**

Outside spaces in private and public ownership, including car parks, turning areas, services and utility areas and spaces supporting play, recreation, sport, movement (motorised or not). This definition should be read together with sections C.7 Public Realm and C.8 Parking & Services of the adopted Design Guide SPD (2022).

### **Sustainable Drainage Systems (SuDS)**

Drainage systems designed to control surface water run off as close to where it falls and mimic natural drainage as closely as possible.

The above definitions shall be read in conjunction with the adopted Development Plan and the Design Guide SPD (2022).

BROOKS ROAD PLANNING BRIEF

OCTOBER 2022

South Downs National Park Authority

South Downs Centre

North Street

Midhurst

West Sussex

GU29 9DH

01730 814810

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