

Consultation response:

Haywards Heath Town Centre Masterplan SPD

Mid Sussex Labour Party welcomes the opportunity to comment on the recently published Haywards Heath Master Plan. In offering these comments the Party recognises the need for such a plan to pass the test of whether it is right for the future of the community of Haywards Heath.

In our view the current draft fails to pass that test. It is a plan that lacks vision and appears rooted in the past. It does not propose a viable, supportive and exciting framework for residents and investors. As a result of that failure we strongly urge a return to the "Drawing Board". Haywards Heath people need a Master Plan that is ambitious and involves the foresight to shape the future of our town centre.

We recommend that the plan is designed to provide Haywards Heath people with a clear sense of purpose based on the community and preferably around distinctive focal points.

The main headline features of a revised plan we would like to see are explored in detail in the body of this submission, but for ease of reference they are highlighted here:

- ✓ An imperative for more engagement with Haywards Heath people. Only through more wide-ranging consultation can decision – makers understand what the community needs and wants. The current position of "unheard voices" must be

addressed. Recent public reaction to the closure of the Clair Hall facility demonstrates that clearly.

- ✓ Much more thought is required to “future proof” proposals. We face massive environmental issues that need local authorities to play their part in addressing. It is vital for all our futures that Councillors in Mid Sussex ensure this plan reflects the longer-term impacts of reducing our carbon footprint with better public transport and more friendly public spaces for cyclists and pedestrians. It is unsatisfactory, if not negligent, to simply re-jig town centre car parking facilities.
- ✓ It is increasingly obvious that current models for thriving high streets are redundant. There is growing appreciation that town centres need revival in different ways, through encouraging increased town centre affordable housing provision, more local independent retailers, and community- based leisure and sports activities at given focal points in Haywards Heath.
- ✓ The latest, December 2020, data from the Office of National Statistics identifies how Haywards Heath has changed in the last 10 years. Whereas population grew by 16% employment levels fell by 6%. The impact of these changes must be reflected in the plan, particularly increased local housing supply with the associated changes to volumes and patterns of traffic flows

The unheard voice

Page 13 (2.3 Study Process) identifies that Mid Sussex District Council (MSDC) believes the stakeholders in the Plan are “Town Council and officers” and “landownersto learn from their knowledge and agree the Vision and Objectives for Haywards Heath Town Centre” Only as an afterthought will the plan be “.... updated to reflect any comments received during the public consultation period”.

This shows contempt for the residents of Haywards Heath and their institutions of clubs and societies all with a stake in the fabric of the town’s life and a keen interest in its future, and a disregard of both individual expertise and corporate cultural responsibility. The Local Government Association’s Code of Practice on Resident Consultations recommends that to do so will help “..to create advocates across your organisation (and beyond) who can promote the opportunities for residents to have their say, it will also help you organisation to establish a culture of using data and insight and of involving residents in decision-making, as well as reducing the chance of duplication, managing risk, and helping to make sure that the council is coordinating its activities in a strategic way.”

Failing to involve residents in developing the plan has already achieved a noticeable and spectacular own goal for MSDC in the case of Clair Hall, where decisions to discontinue use of the existing building prior to any discussion on the future use either of current site and facilities or of alternative and improved location has already resulted in a massive and negative public response. The salutary reference to Clair Hall on page 74 indeed suggests that there was never a serious intention to continue with the current premises, and whilst it lists a series of alternative criteria these could have been explored and developed in direct

consultation with current users and other residents to establish the principles of a flagship resource for a new town centre.

Thus we have a plan developed by planners, council officers, and property owners, with no direct input, no focus groups of residents. To compound the lack of respect for proper consultation processes this plan is then released for comments in a narrow window just before Christmas at a time of national crisis, without opportunity to display or explain. Again the LGA's comments on consultation appear to have been disregarded "Best practice suggests:

- ✓ You should plan for up to six to 12 weeks for a consultation exercise
- ✓ You should also be aware of the legal requirements for your specific consultation topic (statutory consultation has specific rules)
- ✓ If you are embarking on a major consultation, you should plan this well in advance of when a decision is needed. Stakeholders who meet infrequently might need more time to discuss their reply
- ✓ You may need to allow extra time to publicise and promote your consultation to raise awareness
- ✓ Consultations can take longer than expected, so make sure you build in sufficient time"

Given the as yet unquantified effects of the pandemic on social and business flows it is wrong to commit future planning decisions to a model formed imperfectly and without properly understanding current and potential needs of residents. Consultation should be extended over a longer period, widened in its reach of the community and made accessible

to all e.g. Equalities Impact Analysis does not properly account for effects of excluding digitally-excluded people, usually assessed as between 10% and 20%.

Lots of geography, little history

Section 3.1 of the Masterplan seeks to define Haywards Heath within the context of the surrounding area, of its topography and history. Correctly it identifies that development within the town is significantly constrained by topography, the railway line, the ribbon development, exacerbated by recent even more elongating developments of new estates. Development has taken place in phases, each one moving further away from the central hub of the town and has had the effect of elongating the built up area from the 19th century developments radiating out from the railway station, through years of social change to the latest mixed-use developments pushing out the town boundaries on Rocky Lane and off Hurstwood Lane.

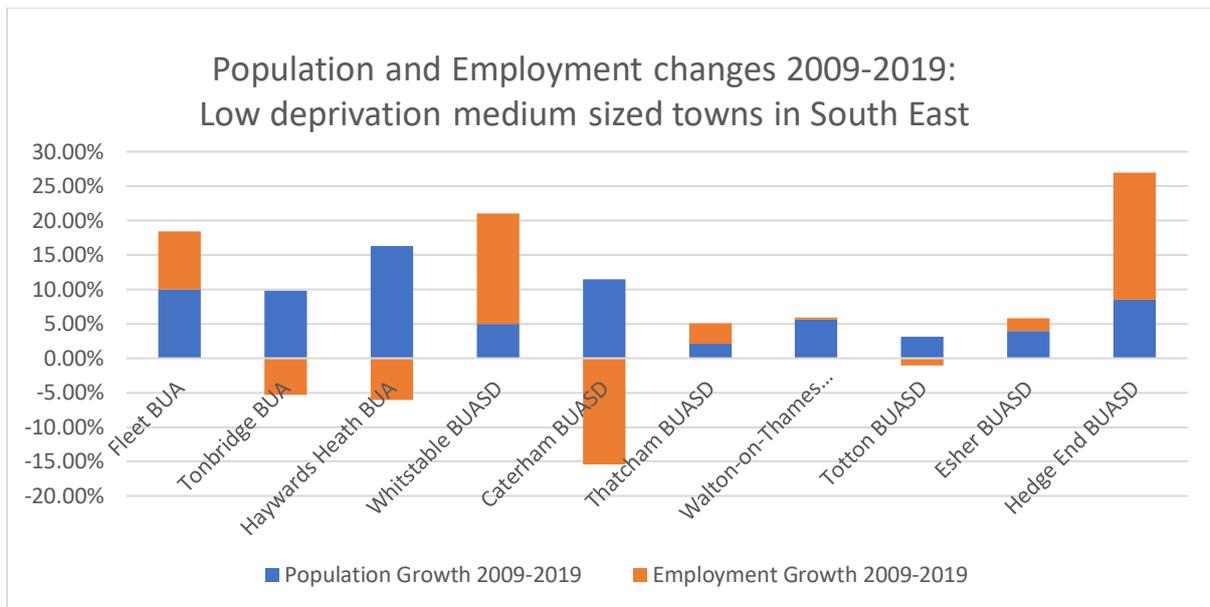
As these developments increased the fringes of the town the central neighbourhoods around the three hubs of the railway station, the Broadway and South Road all pursued different options. Boltro Road lost its shops and its pubs as the market closed and the station car park was redeveloped to meet further increases in commuting traffic. The Broadway changed character completely, losing almost all its thriving retail shops and re-invented itself, very successfully, as a centre for hospitality, by day and by night. Meanwhile South Road failed to respond to the challenges set to retail in the 1980s and 1990s. The sole new development, the Orchards complex, was much smaller than the malls of Crawley or Horsham and found difficulty in attracting keystone stores apart from Marks and Spencer. With choice limited to smaller outlets for chains and a relative absence of big names many shoppers have viewed South Road as a place to make specific purposes rather than to browse, and this has in turn discouraged independent outlets who would benefit from

steady opportunistic footfall. The process of decline has been completed in recent years by the rapid growth of online sales and the collapse of familiar names.

All these things contribute to the sense of Haywards Heath as a place with no common architectural heritage. Absence of coordinated planning and design models have led to a welter of styles and a failure to have either residential or retail buildings that make a statement about the place of the town and its purpose. There is nothing in this plan that suggests a coherent statement of “This is what living in Haywards Heath is all about” by drawing on needs and aspirations to define the character of the town, nor are the proposals in Section 4 convincing that they will link the various locations that makes up the centre. This could be a role for a Clair Hall successor building, or even more than one building meeting multiple artistic and civic purposes and perhaps identified by common design characteristics.

A measure of the lost opportunity comes from the recent (December 2020) ONS data on population and employment growth for the period between 2009 and 2019, which shows that Haywards Heath’s population grew by 16.3% in this period, more than twice as much the other main towns in Mid Sussex, Burgess Hill and East Grinstead. However, whilst Burgess Hill has seen massive employment growth of 12%, employment in Haywards Heath has declined by 6.1%. This is a community with many incomers whose needs are not provided for by local employment and who will tend to spend money elsewhere if their needs are not met within the town. Unlike Burgess Hill and East Grinstead there is no natural centre to concentrate both shops and leisure needs. The town is dying from suffocation.

In fact the chart below shows that of the 10 comparably sized towns in the South East of England that were recorded as being of low deprivation during this period, Haywards Heath had the highest growth in population by far more than twice the national average, and only Caterham had a greater decline in employment.



Pretty pictures on an empty box

Landscaping, public realm, consistent road surfacing and signage are all good qualities but lack the context of harmonising with what the town is all about. Planners should take account of the way retail has adapted to the online age, and the way communities develop despite big supermarkets at the station end of town note how convenience stores have developed to meet resident's needs. Examples very close to the town centre and clearly serving defined neighbourhoods include LOCO on Sussex Road, NISA recently in South Road, Tesco Express adjacent to Orchards flats and Hazelgrove Road, Budgens in Perrymount Road serving Jireh Court and Newton Court flats. Slightly further afield the Coop on Franklynn Road and the Sainsburys Local in Wivelsfield Road serve further groups of housing along the stretch of Franklands Ward.

Section 5.3 purports to address the redevelopment of the Orchards Shopping Centre and associated land. It is acknowledged that this “.. is the largest building parcel of MSDC-owned land (3.7 ha / 9.2 acres) within the town centre” and that it represents an opportunity for “alternative uses”. Vague reference is made to a possibility that there might be a leisure facility (presumably taking up at least some of the functions previously fulfilled within Clair Hall) and, much more strongly, to use part of this land for a 4-story car park which will “enhance town centre parking”. We wish to comment separately about these two issues.

The closure of Clair Hall has deprived the town of an indifferent building that nevertheless fulfilled the vital functions of providing leisure opportunities for a range of age groups and interests, being used as a polling station, hosting reasonably large-scale meetings and it offered cinema club and live entertainment opportunities. Ironically it has now a post-

mortem life as a centre for COVID vaccinations, grudgingly acknowledged by MSDC, since there is no other large building fit for this necessary purpose. It had a niche role in combining civic duties with commercial entertainment. Not to replace it with a modern, purpose-built facility that expands on these functions and is located close to the main retail area of town represents a failure of ambition. Haywards Heath is more than a dormitory for commuters. It is, or should be, the centre for retail and leisure opportunities not just for the more than 30, 000 people living in the town itself, but for all the residents of the villages, from Lindfield and Cuckfield, even from Staplehurst and Horsted Keynes. We believe that a prime objective of this consultation should be to identify what residents want, how many of them would use it, and to develop a business case for providing it.

Answering those questions would then help with understanding the volume of traffic attracted into South Road which would in turn open discussion about the number and location of car parking spaces required. It is another failure of this Masterplan that it rushes to create “development opportunities” from the existing car parks without identifying how many are needed now and in the future.

In 5.5 the Masterplan offers “opportunities” for development of the three existing town centre car parks owned by MSDC. This begs the question of where the cars displaced from these sites will be accommodated. Currently all HH Town Centre car parks provide 642 spaces in all council owned car parks all through the week. According to the Atkins 2015 study, there are 323 on-street parking spaces. Effectively today half of all parking is on the road. The masterplan quotes 1768 spaces in total but this figure includes the station car park which makes no effective contribution for the purposes of the plan. The private car parks in Sainsburys and Waitrose are not included. It is unclear how many spaces will be

available after the consolidation down from 10 sites to 2 multi story car parks, other than there will be an increase. Surely some sort of calculated planning target is appropriate. Is there a separate target for on street parking? There should be. The car parks have 80% occupancy during retail hours.

There are numerous other questions posed by the suggested multi-story car park, including the environmental effects of funnelling traffic into and out of a single central location, where the traffic will go during construction, and of course the fundamental environmental and accessibility issues posed by such a structure. Since MSDC have not put forward any developed arguments or costings it has the appearance of being simply a straw man to deflect attention from the convenient sale of land in the existing car parks.

Where does the traffic come from (and go to)?

The Masterplan assumes that the relief road is underused and that traffic bottlenecks through South Road and on Muster Green gyratory especially at rush hours are misdirected through traffic and goes on to suggest measures needed to redirect. But these plans are still based on the HH Traffic study commissioned by West Sussex County Council (WSCC) and completed by the Atkins consultancy. There is uncertainty as to where traffic is flowing from and to, including at peak periods (Pg26).

It was clear in 2015 that the Muster Green Gyratory was a key pinch point. All the proposals reviewed in 2015 'costed in' for all the improvements except for the Muster Green gyratory plan (similar to that contained in the HH masterplan) which, under the UK Government methods for traffic analysis placed a cost penalty on delays to traffic through the revised gyratory layout. It is unclear whether there is sufficient analysis in these proposals to make the important change to the Muster Green Gyratory work. There is a distinct chance that it won't if other, related measures to reduce the flow of traffic along the B2272 are not strengthened. The goals for the traffic 'discouragement' at Butler Green are vague. Why not state a goal to ensure that journey times through the centre of two will be longer than when using the relief road by means of speed limits, repositioning of traffic lights, etc.

The issue seems plain, traffic flows toward the Muster Green Gyratory in the morning and away from it in the afternoon. The report states plainly that MSDC are uncertain where the traffic is going to and coming from. The inescapable conclusion is that MSDC needs to work with West Sussex County Council on a new and scientific traffic survey designed to show the

full extent and implications of traffic flow, including start and destination points, by whom, for what purpose in what type of vehicle, etc. Only this would fulfil the stated purpose of the Masterplan to “.. provide a framework for prioritising investment in transport infrastructure in [and] around the town centre”

Is our town future-proof?

The Executive Summary of the Masterplan states that it “... covers the plan period to 2031 and sets a framework for projects both short-term and long-term within this period. This is particularly important given the changing role of town centres in light of the Covid-19 pandemic...”, and it goes on to say that it “... will provide a framework for future planning decisions as well as investment.”

There are massively important issues here which demand that the plan be scrutinised to ensure that it meets the needs of residents over the next 10 years. The COVID-19 pandemic is mentioned almost in passing, but it has already had massive effects on the way people work and has hastened massive changes to our shopping habits. A town that has grown largely because of its convenience for commuting has to confront the prospect that many of the service industry jobs that provided employment have been shown to be perfectly adapted to working from home and even if the pandemic is finally rolled back it will be economically attractive for many employers to continue with remote working, saving on overheads for business rates and rents. High property costs in Haywards Heath may make it much less attractive to live here and there will be increasing pressure for high quality local leisure facilities as lifestyles change and more time is available to people.

Online shopping had already ravaged traditional retail sales and forced redundancies and closures for many popular chains even before the effects of the lockdowns. The major supermarkets have tripled the volume of online sales during this year and the change in habits is likely to be permanent. Even before the pandemic the Mayor of London’s High Streets and Town Centres Adaptive Strategies was recommending “Treat the high street as a business incubator. Plan for adequate workspace to support diversity within the future

vision, and carefully consider retention of existing building to support viability and continuity of local businesses. For example, this could be the promotion of new models of collaboration between local authorities, local communities and businesses.” An effective plan for Haywards Heath must identify how we can bring about these changes and select the opportunities that work locally.

The other vitally important challenge is to adapt effectively to a greener future. It is not sufficient to introduce cycling lanes and to cut down the hedge on the frontage of Victoria Park. We believe this plan should confront the dilemma that has been created by recent developments. The large new estates on the north side of Rocky Lane and adjacent to Hurstwood Lane are predicated on car ownership. Public transport is skeletal, particularly during evenings and on Sundays and the local environment offers almost no facilities, from shops to schools and medical centres. We believe that MSDC should investigate, using traffic consultants, what the public transports requirements are for the whole of the town, and pledge to work with the bus operators to provide that service, providing subsidies or using Section 106 moneys where necessary.

The Labour Party’s environment manifesto of 2019, A Plan for Nature, set new criteria to be answered when assessing the environmental sustainability of new plans. These included

“Does the proposal:

- disturb protected habitats or threaten protected species?
- impact significantly on air, water or soil quality?
- contribute net biodiversity gains?
- take account of predictable effects of climate change?

- involve material change to the appearance of the landscape or townscape?
- affect the number of people exposed to noise or the levels to which they are exposed?
- lead to a change in environmental or health impacts of waste management?
- change the degree of water pollution, water abstraction or exposure to floods?
- achieve carbon neutrality or contribute to carbon sequestration?

We don't see in this Masterplan an attempt to ask or find serious answers to a number of these questions. In particular the heavy emphasis of the plan on road traffic movement and parking seems entirely regressive in nature, with no recognition of the existing market switch to electric transport and no provision to set up a grid of charging points, surely an essential for a plan extending into the 2030s.

Conclusions and Recommendations

Mid Sussex Labour Party believes that a new planning approach must be taken to rebuild our town centres at this time of rapid social and economic change. Throughout Mid Sussex the effects of the pandemic and other global market changes will redraw the map of our civic life. Employment loss at Gatwick, a new emphasis on home-working, the urgent demands of climate change will all contribute to reshaping how people live in towns and what they want from them. It is not sufficient to tinker at the edges of existing configurations and movement flows. We must be bold and prepared to listen to all stakeholders – residents as individuals and in communities of common interest, experts in planning, economists, traditional retailers, and new entrepreneurs – and then be imaginative in our response to this evidence.

We recommend that this draft should be withdrawn and instead a new, wide-ranging consultation should take place that involves all of the stakeholders through a variety of means, from personal interviews and focus groups when safe and appropriate, to online seminars and questionnaires. We believe this process should ensure that it is accessible to all residents, especially the elderly and disadvantaged who may be lacking in digital access and the skills to use it. We think there is a value here in using community groups to reach out and gather this evidence and we would certainly be prepared to offer our services in this cause.

In our response we have identified other activities which we believe are essential to take place in parallel with this consultation:

- A further and more detailed assessment of current and projected traffic flows from developments within the last 5 years and from new developments approved
- A review of leisure facilities and civic requirements to replace Clair Hall
- An environmental focus not just on beautification but on the sustainability of proposals for development