



The countryside charity
Sussex

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Planning Policy Dept.,
Mid Sussex District Council
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27th November 2020

Sent by e-mail to: PolicyConsultation@midsussex.gov.uk

Dear Sirs,

Haywards Heath draft Town Centre Masterplan SPD

I am writing on behalf of CPRE Sussex, the Sussex countryside charity, to comment on the consultation draft Masterplan for Haywards Heath town centre.

We welcome all the proposals within the proposed Masterplan that seek to pull together the three main corners of the town (Orchard Centre, Broadway and station), and applaud the intent to improve walking and cycling connections and signage between them. We do not in this submission comment on those individual positive proposals.

Our overriding concern with this proposed plan is its failure to take this opportunity to develop a forward thinking, transformative strategic Masterplan whose driving purpose is to encourage and lead the required change towards a zero carbon, healthy, safer and environmentally friendly town centre. Those objectives are all entirely compatible with maintaining its economic vitality – indeed making Haywards Heath a more pleasurable, healthy town to live and work in can only operate to its economic betterment.

We note with dismay that neither the draft Masterplan nor its accompanying Strategic Environmental Assessment Screening Report makes a single reference to planning for climate change or transport decarbonisation, or to reducing greenhouse gas emissions or air pollution or noise. These are all fundamental to creating a better place over the next decade for people to live and work in, and to visit. A plan that does not have those as core stated objectives, with policies to give effect to them, does not pass muster. And what value is an EIA that completely ignores them?

The Government rightly sees town centre planning as a key part of its ambitions to achieve its zero carbon, public health and 25 year Environmental Plan goals. A different car/life balance is inevitable to make this happen. As the Transport Secretary, Grant Shapps MP, said on 13th November 2020:

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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“The government therefore expects local authorities to make significant changes to their road layouts to give more space to cyclists and pedestrians. Such changes will help embed altered behaviours and demonstrate the positive effects of active travel.”¹

We are therefore disappointed to read in the draft Masterplan that *“Whilst opportunities to increase levels of walking and cycling to the town centre will be facilitated and encouraged through potential public realm and infrastructure improvements set out within this Masterplan, **the success of the town centre will still be reliant on provision of adequate car parking capacity to meet current as well as future predicted need. Provision of adequate parking capacity is a driver for economic vitality.**”*

This assumption of continuing, indeed growing, car dependency flies in the face of the imperative need, fully recognised by Government, for a fundamental, plan-led, shift in transport use, especially in and around town and city centres. For example, the Dept of Transport 2020 Report “Decarbonising Transport – Setting the Challenge”² says:

“Transport has a huge role to play in the economy reaching net zero. The scale of the challenge demands a step change in both the breadth and scale of ambition and we have a duty to act quickly and decisively to reduce emissions. The associated benefits of bold and ambitious action to tackle transport emissions are also significant. We can improve people's health, create better places to live and travel in, and drive clean economic growth. The faster we act, the greater the benefits.

Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network. ... From motorcycles to HGVs, all road vehicles will be zero emission. Our goods will be delivered through an integrated, efficient and sustainable delivery system.

We want public transport and active travel to be the natural first choice for our daily activities. An important aspect of reducing emissions from transport will be to use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network. For those able to do so, we would like cycling and walking to be the easy and obvious choice for short journeys. Future demand for transporting goods, in response to changing consumer behaviours, is an important consideration. A huge opportunity exists to transform ‘last mile’ deliveries, ensuring an integrated, clean and sustainable delivery system. Reducing emissions for last mile deliveries, particularly in urban areas, as well as potential improvements in logistics efficiency have a key role to play.”

CPRE Sussex therefore urges your Council to put the current draft plan on hold until you have had time to address positively the opportunity to use this Masterplan to create policies that will achieve the following objectives, none of which appear to have been considered to date:

¹ <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19>

² **Dept of Transport 2020 Report “Decarbonising Transport – Setting the Challenge”**, Ministerial Foreword and p.60. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

1. stopping through traffic along South Road, and substantially pedestrianizing it by converting it to a low traffic zone along its length, and explore the possibility of Government funding towards the cost of its implementation³.
2. develop new ways in which last mile deliveries to local retail establishments can be effected in a way that is compatible with a low traffic zone and greenhouse gas emission reductions;
3. increase active monitoring of air quality (including micro-particulate matter with a diameter of PM0.1 as well as NO²) along all main gateway routes entering the town, as well as South Road, based on toughened transparent measurement criteria appropriate for the setting of a town centre that is aiming to become a clean air beacon;
4. install infrastructure early for enough fast electric charging points to meet need as at the end of the Plan period in the context of the Government's faster roll-out requirement for electric vehicles, and identify where charging points will be available;
5. initiate workplace parking charges to encourage the use of sustainable modes of transport to work, especially where office forecourts are to be made available for parking;
6. commit that all pedestrian areas, pavements and road crossings⁴ will be made suitable for use by those who are disabled or find it difficult to walk longer distances, including people dependent on mobility scooters or wheelchairs, and those who are visually or audially impaired; and commit to enforce pavement parking restrictions, especially where parking inhibits access or progress of vulnerable pavement users; and
7. increase the amount of tree and plant material within the town for its carbon and noise absorbency, and its aesthetic benefits.

A temporary pause in the Masterplan development to address these points would also give your Council time to be able better to evaluate the implications of behavioural impacts of the coronavirus pandemic on longer term office and retail requirements in the town, as this is at present very uncertain and could significantly affect the town's strategic planning. The balance between commercial requirements and new residential opportunities within the town centre is an obvious example.

³ <https://www.gov.uk/government/news/175-million-more-for-cycling-and-walking-as-research-shows-public-support>

⁴ This should apply not only in the centre of the town but along all pavements and routeways that connect the centre with Haywards Heath town's care homes and old age residential accommodation etc.

The significance of the potential helpful impact of a low traffic zone within the town centre on local greenhouse gas emissions is highlighted by the findings of the Government's Committee on Climate Change which has identified short vehicular shopping trips as the most frequent use of cars.⁵

We recognise that the introduction of a low traffic zone along South Road could be controversial, as any policy that requires behavioural change is, and that full consultation with those affected would be required. That should not deter your Council from action. There are obvious extensive benefits:

- no through traffic, diverted onto by-pass;
- lower greenhouse gas emissions;
- improved air quality;
- reduced noise pollution;
- pedestrian friendly high street;
- healthier environment;
- safer streets;
- supports walking and cycling strategy;
- encourages increased footfall;
- fosters sense of community.

There are successful local traffic neighbourhood models to learn from⁶; and the multiple social, environmental and long-term economic benefits, benefits make LTNs surprisingly popular with the public, as has been shown in a number of surveys. For example, an October 2020 survey undertaken by Kantar Media and quoted by the Government, reveals that 65% of people across England support reallocating road space to cycling and walking in their local area, and that 78% support measures to reduce road traffic in their neighbourhood.⁷

The need for all public authorities to take substantial steps now to reduce greenhouse gas emissions is imperative so as to enable the country to achieve its promised net zero target – indeed councils have a legal duty to do so under the Planning & Compulsory Purchase Act 2004.⁸ Inaction would be negligent. The introduction of a carefully planned low traffic zone along South Road seems to us to be the most positive and beneficial single step that your Council could take in the context of the Haywards Heath Masterplan to improve the quality of life for all in the town without harm - indeed offering benefit - to the local economy, coupled with the other Plan improvements that we are suggesting in this letter.

We are concerned that the new Masterplan has been developed to this advanced stage with such narrow prior consultation, and without any apparent input as to the wide-ranging climate change impacts and

⁵ **Committee on Climate Change report: UK Housing – Fit for the Future?** Chapter 3.4 (Sustainable Transport) (February 2019) <https://www.theccc.org.uk/wp-content/uploads/2019/02/UK-housing-Fit-for-the-future-CCC-2019.pdf>.

⁶ **Living Streets/Sustrans: Low Traffic Neighbourhoods – an Introduction for Policy Makers**, and **A guide to Low Traffic Neighbourhoods**: <https://www.livingstreets.org.uk/media/3843/lcc021-low-traffic-neighbourhoods-intro-v8.pdf> and <https://www.livingstreets.org.uk/media/3844/lcc021-low-traffic-neighbourhoods-detail-v9.pdf>

⁷ See <https://www.gov.uk/government/publications/public-attitudes-towards-traffic-and-road-use> . There is also a YouGov poll which indicated that 57% of those polled were strongly or broadly in favour of them, with 16% against, and 27% neutral or didn't know.

⁸ S19(1A) of the 2004 Act requires that “*Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change*”.

opportunities that its introduction presents. We can only urge you, even at this stage, to be prepared to step back and re-think the Masterplan more ambitiously in that context.

If we can offer any further information or assistance, please feel free to contact us.

Yours faithfully,

Michael A Brown

On behalf of CPRE Sussex, the Sussex countryside charity