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FOA Mr Stephen Ashdown

Date 12 January 2016
Our ref 14782/JF/AY/10485052v2
Your ref DM/15/3858

Dear Mr Ashdown,

**Planning Application Reference: DM/15/3858 – The Martlets Shopping Centre
Burgess Hill West Sussex**

We write in respect of the above planning application on behalf of our client LaSalle Investment Management (LSIM). LSIM is a leading real estate investment management company that owns and operates a number of town centre assets across the UK.

LSIM manages the Market Place Shopping Centre in Burgess Hill on behalf of NILGOSC (Northern Ireland Local Government Officers Superannuation Committee). Market Place is situated immediately adjacent to the application site at The Martlets (including some encroachment into land under the ownership of LSIM). Currently, the two shopping centres form a significant portion of Burgess Hill's primary shopping area.

LSIM is therefore a key stakeholder in the town centre with a keen interest in the future of the town centre as a whole. LSIM is aware of the Council's long held aspiration for redevelopment within Burgess Hill Town Centre, included in adopted and emerging planning policy, and has historically been party to high level discussions with the applicant. LSIM supports the principle of development which will help to maintain and enhance vitality and viability of Burgess Hill town centre. LSIM however has substantial concerns with the current scheme, which in its present form it fears falls short of what is needed to deliver a beneficial scheme for the Town Centre as a whole. These fundamental concerns are outlined in turn below.

1. General Layout and Loss of Retail Route

LSIM is deeply concerned that the proposals give little consideration to movement between the scheme and the rest of the town centre, including Market Place. This should have been one of the key design considerations and has not been afforded the appropriate weight.



Of particular concern is the scheme's south eastern interface with Market Place. This is one of the main routes in the town centres retail circuit and it is therefore very important for the future function of the town centre. As shown on the masterplan and layout plans, the existing access is to be blocked and pedestrian flows would be directed to through the existing, but minor, south westerly access at Market Place. This would result in an awkward and inefficient arrangement, reducing legibility and risks causing a pedestrian bottleneck. The design quite clearly seeks to maximise the floorplate of development to the detriment of pedestrian movement within the town centre and at loss to a defined retail route.

This approach is contrary to the Burgess Hill Town Centre Masterplan Supplementary Planning Document (2006) which outlines proposals for the redevelopment of the town centre. The SPD seeks to develop an accessible, legible and welcoming town centre (Objective 2) and to create a high quality retail circuit (objective 5).

We note this matter has also been raised by the Mid Sussex District Council Urban Designer and the Mid Sussex Design Review Panel (DRP). The scheme designer has provided a response to the DPR (dated 12 October 2015) which we have reviewed and consider wholly inadequate. The response focuses on the design being driven by a desire to create outward looking retail units with a new link along the south side of the proposals, connecting to Market Place. The result is a scheme that creates a standalone destination, turning its back on the rest of the town centre, contrary to the SPD objectives. It is evident that commercial drivers have been prioritised in this part of the scheme, creating a sub-standard design response that if not addressed risks undermining the potential of the proposals for the rest of the town centre.

Further consideration to a design solution which achieves both the applicant's objectives alongside those of the Town Centre Masterplan (i.e. to retain an accessible, legible retail circuit) is therefore essential. An alternative design solution might readily involve reworking the south eastern corner of the cinema block to better integrate with the Market Place and retain the primary shopping area route.

As a key stakeholder it is disappointing that LSIM has not been consulted on this arrangement to date, LSIM would be happy to discuss this matter with the applicant and the Council in more detail to try to arrive at an acceptable solution.

2. Design of Interface with Market Place

Due to the lack of an appropriate plan provided within the application submission, Nathaniel Lichfield & Partners requested an elevation demonstrating the interface between the proposed scheme and Market Place. The subsequently provided plan (drawing No. 356 rev 0) confirmed that the interface will involve blocking up the existing route between the centres with a featureless façade. As noted above this means the proposed scheme essentially turns its back on the remainder of the primary shopping area. The facing wall is a poor quality design solution and risks creating low level of design amenity for this important town centre scheme, which would be detrimental to both Market Place shopping centre but also the wider town centre.

The unwelcoming wall on the Market Place is contrary to policy in the SPD which seeks to create an accessible, legible and welcoming town centre (Objective 2). In addition, SPD development guidance is not adhered to, which states *"new development should seek to provide high quality, contemporary design that could help forge a new physical identity"* (page 67). This compounds the



need for an alternative design solution as suggested in the point above and proves that the scheme is not acceptable in this regard.

3. Transport Issues

Transport issues are particularly important for the ongoing success of the town centre. Transport matters have been reviewed by LSIM's transport consultants Glanville and a technical note has been appended to this letter (Appendix 1).

In summary, Glanville Consultants take considerable issue with the proposed development introducing reduced parking provision within Burgess Hill town centre, the application's Transport Assessment under-estimating the future increase in traffic and the lack of mitigation measures to render the scheme acceptable in transport terms.

The technical note indicates that scheme is contrary to the objectives set out in transport and parking policies in saved Local Plan Policies T4 and 5 and emerging District Plan Policy DP19.

Concluding Comments

We hope the enclosed comments are useful in the Council's consideration of the scheme. As set out in this letter whilst LSIM supports the principle of investment in Burgess Hill it has significant concerns with the scheme in its current form. At present the scheme is contrary to planning policies relating to the redevelopment of Burgess Hill and transport matters.

The issues outlined in this letter must be addressed in order for Burgess Hill to benefit from the proposals. LSIM would welcome discussion with the applicant to seek to work through these important issues.

If you have any questions in relation to this letter, in the meantime, please do not hesitate to get in contact.

Yours sincerely



Alison Bembenek
Senior Planner

Cc

Ben Notley - LSIM



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

Appendix 1 – Transport and Highways Technical Note

**BURGESS HILL TOWN CENTRE
THE MARTLETS SHOPPING CENTRE REDEVELOPMENT
TRANSPORT AND HIGHWAYS**

Introduction

This technical note has been prepared for LaSalle Investment Management by Glanville Consultants to provide advice to assist with the consideration of the transport and highways impact on its Market Place Shopping Centre, Burgess Hill of a planning application (Ref: DM/15/3858) for the proposed redevelopment of The Martlets Shopping Centre, Burgess Hill which is adjacent. Together, The Martlets and Market Place form the primary retail offer within the town centre.

The following documents have been reviewed:

- Transport Assessment (September 2015) prepared by Connect Consultants
- Road Safety Audit Stage 1 (October 2015) prepared by TMS Consultancy
- Retail Travel Plan (September 2015) prepared by Connect Consultants
- Residential Travel Plan (September 2015) prepared by Connect Consultants
- Car Park Management Plan (September 2015) prepared by Connect Consultants
- Strategic Planning Consultation (November 2015) prepared by West Sussex County Council

Proposed Scheme

The proposal will involve redevelopment and intensification of the site and will include 6,530sqm additional retail space, new library, 63-bed hotel, 142 residential units and a 10-screen cinema. The existing 165-space multi-storey car park and 60 other spaces within The Martlets will be replaced by a 163-space extension further north of the existing surface Market Place car park, principally used by Waitrose customers, that adjoins the application site. Thus, overall, 283 parking spaces are proposed (excluding the Market Place car park), which is an increase of 58 over the existing. However, 120 will be for residential parking so there will be a net loss of 62 spaces for town centre uses.

Sole access to non-residential parking for both The Martlets and Market Place shopping centres will be left-only from Queen Elizabeth Avenue via the existing Market Place access and car park principally used by Waitrose customers, with sole egress shared with the corresponding existing left-only exit onto Civic Way. The residential car park will be accessed via a new arm on the Civic Way/Church Lane mini-roundabout junction.

Impact on Market Place

The Transport Assessment makes reference to car park accumulation surveys which showed the combined maximum occupancy of the multi-storey car park, Market Place car park and the other car parking areas within the application site to be 446 spaces. Assuming no change in parking demand post-development, this could be accommodated within the total proposed parking provision, including Market Place, of 457 spaces which represents 98% occupancy.

However, it would seem reasonable to expect duration of stay to increase significantly as a result of the increased retail and the other attractions on offer. Taking this into account as well as increased parking demand generated both by the development and by committed residential development in the wider Burgess Hill area that can reasonably be expected to result in increased use of the town centre, both with or without the development, it is clear that, regularly, on-site parking provision will be insufficient to cope with demand.

Although the other town centre car parks have been shown to be operating with ample spare capacity the on-site provision will be under most pressure, with Waitrose customers particularly disadvantaged in terms of difficulty in locating a space convenient for bulk food shopping. Traffic circulating to find vacant spaces will add to congestion within the car park as well as adding to congestion on the local highway network in the immediate vicinity as vehicles are forced to exit to seek to park elsewhere. No account has been taken in the Transport Assessment of the impact of these additional traffic movements on the town centre road network.

Impact on Local Highway Network

Whilst some attempt has been made in the Transport Assessment to take account of increased traffic as a result of committed residential development in the Burgess Hill area, increased foodstore traffic has been specifically omitted from the assessment which has resulted in under-assessment of increased traffic.

Under-assessment of increased traffic means that the junction capacity assessments cannot be relied upon and will need to be reworked, although it is expected that its effect on car park capacity will be of greater concern as the data would seem to suggest that, for the most part, the local highway network has spare capacity.

Impact on Walking, Cycling and Public Transport

There are no proposals for off-site improvements that would encourage or enhance journeys by walking, cycling or public transport or to accommodate better within the development the needs of pedestrians, cyclists and public transport users. Such users already form a significant proportion of those travelling to and from town centre facilities and there is clear potential, and, indeed, there is an expectation in the Travel Plan, for this to be increased.

Travel Plan

The framework Travel Plan envisages individual Travel Plans for each occupier, but not an overarching Travel Plan for the development as a whole. Whilst individual occupier Travel Plans are appropriate, a development-wide Travel Plan would ensure a consistent approach across the site and would offer economies of scale in terms of monitoring and implementation. In addition to co-ordinating the individual occupier Travel Plans with the Travel Plan for the residential element of the development, the overall Travel Co-ordinator should also establish contact and work with other Travel Plan Co-ordinators locally in the wider town centre area.

Summary and Conclusions

The proposed scheme intensifies use of the site but reduces the parking provision for town centre shoppers and limits vehicular access to entry and exit via the existing Market Place car park, principally used by Waitrose customers.

The existing surveyed maximum parking demand would result in 98% occupancy of the proposed car park. In our view, the Transport Assessment does not take sufficient account of longer average parking durations and increased traffic generated by the additional facilities, as well as increased traffic generated by committed residential development in the wider Burgess Hill area, which thus results in the proposed parking provision being insufficient. Consequently, the Transport Assessment does not take account of insufficient parking leading to congestion and delay within the car park and on the local highway network in the immediate vicinity.

It is also considered that the Transport Assessment under-estimates the future increase in traffic in the town centre, although we note that the base data would seem to suggest that the local highway network has spare capacity.

There are no proposals for on- or off-site measures to encourage or enhance journeys by walking, cycling or public transport which will not assist with realising the expectation in the Travel Plan for increased mode share of such journeys.

The framework Travel Plan does not envisage a development-wide Travel Plan that would offer the benefit of economy of scale in terms of monitoring and implementation.