

Your Ref: DM/24/3077

13th February 2025

FAO: Susan Dubberley
Mid Sussex District Council
Planning Department
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Dear Sue,

DM/24/3077 – SUSSEX HOUSE, PERRYMOUNT ROAD, HAYWARDS HEATH, RH16 1DN

FULL PLANNING APPLICATION CONSULTATION RESPONSE

On behalf of our client, Aldi Stores Limited (the applicant) Avison Young submitted a full planning application to Mid Sussex District Council (MSDC) on 17th December 2024 for the following description of development:

“Demolition of the existing buildings and construction of a new food store (Use Class E(a)), with access, car and cycle parking, landscaping and associated works.”

Following submission, there has been various comments provided by local residents as part of a comprehensive consultation process. This letter provides a summary of these comments, the applicant's response and the additional information provided in support.

This response is structured as follows:

1. Comments Received
2. Summary of Responses to Comments

1. Comments Received

Detailed comments have been received during the consultation process from local residents, with a total of 182 comments received so far as of 5th February 2025. Of the 185 public comments, there have been 148 (81%) letters supporting the proposed development registered so far and 34 (19%) objections. We are aware of an additional 80 supportive representations that have been submitted in recent days that have not yet appeared on the planning register. Therefore, the current total number of comments in support is 228.

The most frequent reasons for supporting the scheme are centred around investment into the local economy, the provision of affordable produce, reduced travel times to reach a discount foodstore, and new jobs being provided for local residents.

The main reasons for objecting to this scheme relate to an increase in traffic, the potential impact the proposed store will have on local businesses, the over provision of supermarkets in Haywards Heath and the under development of the Site.

In addition to the public comments, the Haywards Heath Town Council have provided their support for the planning application. The Town Council acknowledges that the proposal complies with the Haywards Heath Neighbourhood Plan, which promotes the best use of brown field sites in the Town Council's designated Town Centre, for economic restoration.

The Haywards Heath Town Council also raised the following comments:

- Concern regarding traffic generation.
- Safety concern regarding the Cricket Club and concern of the loss of green buffer.
- Uncertainty about the S106 Contributions made to the Town Council and community.
- Concern with the loss of the Post Office

2. Summary of Responses to Comments

This section provides further detail on local resident comments received in relation to the application and summarises the detailed responses provided.

Highways

The main highways concerns raised have been about access to the Site from Perrymount Road (B2028), perceived insufficient parking, delivery movements and concerns relating to an increased risk of collisions and traffic on Perrymount Road. These matters were all addressed in the submitted Transport Assessment prepared by Connect Consultants. This has subsequently been confirmed in the response received by the West Sussex County Council (WSSCC) Highways Authority. Notwithstanding, for completeness we have provided a further summary of this below.

The Transport Assessment confirms that the Site has a good level of accessibility by all relevant transport modes, and there is no evidence of a highway safety problem.

Following detailed discussions with MSDC and WSSCC, the vehicular access to Site will remain in the same location as is present on Perrymount Road. The access point will be widened on the north side to ensure that the positioning for drivers relative to the signal crossing is maintained as existing. Swept path analysis has been undertaken and submitted in the Transport Assessment which demonstrates that the access arrangements and layout of the Proposed Development are suitable for the largest vehicles that are expected to use the Site. The site layout has been designed so that service vehicles will enter and leave the site in forward gear.

WSSCC confirm that the access vision splays, including the 22m splay when a bus is using the bus stop to the north of the access, are considered appropriate for the Aldi access based on the surveyed speeds and findings of the Stage 1 Road Safety Audit.

In terms of vehicle parking, the proposed Aldi food store will provide a total of 97 car parking spaces. The Transport Assessment provided a TRICS assessment to justify the parking allocation

which shows that the accumulation peaks at 51 vehicles on weekdays and 52 vehicles on Saturdays. Therefore, the proposed provision of 97 car parking spaces will sufficiently accommodate the average demand expected and has significant spare capacity for peak demand.

The TRICS assessment also forecasts potential traffic attraction. WSCC's response states that the calculation of the net traffic effect shows that the proposed development could attract up to 26 and 91 additional traffic movements during the weekday AM and PM peak hours respectively, and 205 traffic movements during the Saturday peak hour. The PICADY9 computer program has been used to assess the operation of the Perrymount Road / Site access junction. The PICADY results show the proposed access will operate within capacity in with the proposed food store in place.

Another concern raised relates to the servicing arrangements of the new Aldi food store. Aldi operate a closely managed servicing arrangement for each of its stores. The store will receive an average of three large HGV deliveries per day and one medium goods delivery per day. Daily deliveries of milk, bread and morning fresh produce are received prior to, or as early as possible after, the store opening in the morning.

Stores are constructed with a delivery ramp, sheltered canopy and dock leveller system which allows the deliveries to be unloaded away from the car park and main pedestrian areas. Where required, a trained Pedestrian Marshal is utilised by the store to guide pedestrians in a safe manner whilst a service vehicle is manoeuvring. A Workplace Transport Risk Assessment has been prepared and submitted to support the planning application.

Impact on the Cricket Club and loss of green buffer

The Site is separated from the Haywards Heath Cricket Club, located within Clair Park, to the east by a number of mature trees located adjacent to the Site's boundary. As part of the proposed development, the trees located along the eastern Site boundary are to be retained and a total of 31 additional trees will be planted, including a number of new trees along the eastern boundary. Therefore, the green buffer between the Site and Clair Park will be enhanced and strengthened.

In terms of potential impact on the operation of the Club, Aldi are working with the Haywards Heath Cricket Club and the Council to explore the best practical solution to minimise the risk of stray cricket balls landing in the Aldi car park.

Uncertainty about the S106 Contributions made to the Town Council and community

The draft heads of terms and the Section 106 Agreement are being explored with Mid Sussex District Council as part of the determination of the planning application.

Currently, MSDC does not have an existing CIL Charging Schedule, and no timeline has been decided on implementing one in the future.

Retail Impact

Concerns were raised by the public comments for the over provision of supermarkets in Haywards Heath, especially in this part of the town where there are already existing Waitrose and Sainsburys food retailers.

Aldi has a very different approach to food retailing than other food retailers based on simplicity and maximum efficiency at every stage of the business, meaning that it is seen as a 'deep discount' retailer, also known as a Limited Assortment Discounter (LAD).

The proposed Aldi store will provide a LAD at a location where there are no LADs within the local context. This will provide local benefits to residents, in addition to the creation of new jobs, by providing additional choice of high quality, low-cost food produce during the cost-of-living crisis. The aim is for goods to be sold with discounts of between 20–30% for a full shopping trolley. This reflects a shift towards meeting community needs while balancing economic growth and maintaining the vitality of town centres. Therefore, there are a number of public benefits resulting from the Proposed Development.

As part of the emerging District Plan, the Council's evidence base has been updated and a new Mid Sussex District Council Retail Study (2022) has been prepared. The Study concludes that there is immediate capacity for additional convenience floorspace within the district, equivalent to between 3,300 and 5,700 sqm net in 2021, rising over the plan period to between 6,000 and 9,900 sqm net by 2038.

The Retail Assessment undertaken as part of the planning application identifies that there are no sequentially preferable sites in a town centre or edge of centre location for the proposed development. The convenience food quantitative impact on Haywards Heath town centre in 2026 is 0.40%. Coupled with the health check that has been undertaken for the centre, this is not considered to comprise a significant adverse impact. Therefore, the proposed development is in accordance with paragraph 95 of the NPPF.

Loss of the Community Use

There have also been comments regarding the loss of Post Office in the Budgens currently located on the Site.

The Proposed Development would result in the demolition of the existing Budgens store which includes an internal Post Office counter. The loss of the existing Post Office counter will be offset by the numerous duplicate facilities in the local area. There are several branches in the area, including the following:

- Haywards Heath Delivery Office, located at Royal Mail, Delivery Office, Mill Green Road, Haywards Heath, RH16 1AA – located 100m to the north of the Site.
- Haywards Heath Post Office, located at 65 South Road, Haywards Heath, RH16 4LQ – located 1km to the south of the Site.
- Lindfield Post Office, located at 81 High St, Lindfield, Haywards Heath, RH16 2HL – located 1.65km to the north east of the Site.
- Cuckfield Post Office, located at Queens Hall, High St, Cuckfield, Haywards Heath, RH17 5EL – located 2.78km from the Site.

Given the number of Post Office facilities in the local area, it is considered that there are sufficient duplicate facilities providing sufficient choice to serve the area without detrimentally impacting

residents. The Post Office use is ancillary to the existing Budgens store and could halt service and vacate the premise at any time.

Proposed Use of the Site

Comments have been received regarding the proposed use of the Site as an Aldi food store in this location.

At the heart of the draft NPPF is a 'presumption in favour of sustainable development'. The NPPF paragraph 125 includes a requirement to proactively drive and support sustainable economic development to deliver homes, businesses and infrastructure and thriving places that the country needs; encourage the effective use of land by reusing land that has been previously developed (brownfield land); promote mixed use developments and encourage multiple benefits from the use of land in urban areas; and focus significant development in locations which are or can be made sustainable.

The Site comprises previously developed (brownfield), under-utilised land with an existing retail use situated on the Site. The existing buildings on Site have low sustainability credentials and no architectural merit. All policies at national, strategic and local level support the sustainable redevelopment and intensification of the Site to ensure the most efficient use of land, and provision of new jobs.

The Haywards Heath Town Centre Masterplan SPD (2021) indicates heights of between 2 to 3.5 storeys for this location.

The proposed development has been carefully designed to respond to the Site's constraints, address the existing site levels and consider the surrounding area. The proposed maximum height of the food store is 6.2m from finished floor level to the apex of the mono-pitch roof. This has been designed to improve the setting of The Heath Conservation Area, and to reduce the impact on the residential amenity of the surrounding 2 storey residential dwellings.

As set out within the submitted Heritage Statement, the proposed scheme would not detract from the character of The Heath Conservation Area and has the opportunity to enhance the setting of the conservation area with a lower built form. Further intensification of the Site to provide residential uses above the proposed store would likely have adverse impacts on the Conservation Area and the setting of the Grade II Listed Church of St Richard, located on Sydney Road. Therefore, the proposed development has been designed in accordance with the NPPF, Local and Neighbourhood planning policies.

In terms of the proposed retail use and as set out above, the proposed development satisfies the retail sequential site assessment and will address the immediate capacity for additional convenience floorspace in the local area. The proposed development would continue to comprise an employment generating use, supporting approximately 40 full time jobs and will contribute significantly to the local economy and provides an employment function.

In accordance with NPPF para 125, the proposed development will comprise a significant number of benefits including:

- Making better use of an under-utilised and partially vacant brownfield site: the existing old and under-utilised buildings would be replaced by high quality, visually attractive buildings which incorporate sustainability features.
- The construction of the new store will create employment opportunities, working with their chosen contractor Aldi are often able to identify individuals that are seeking work placements and may be able to accommodate these during the project.
- The Aldi food store would support in the region of 40 FTE jobs, providing employment for local people and offering flexible employment opportunities within entry level positions. The jobs will be suitable for elderly and part-time workers.
- The provision of an anchor low-cost food store, which will provide residents an alternative option for food shopping which will serve the local and wider population and support linked trips.
- The sustainability credentials of the proposals demonstrate environmental benefits through the inclusion of photovoltaic panels; 24 electrical vehicle charging parking spaces (6 active and 20 passive for future provision); designed to achieve BREEAM very good.
- The Proposed Development will incorporate cycle stands, electrical vehicle charging facilities and encourages use of public transport.
- Improvement to the visual appearance of the Site and to The Heath Conservation Area.
- A comprehensive landscaping plan which improves the BNG of the site by a 928.39% biodiversity net gain (BNG) for habitat units and 1,544.44% biodiversity net gain for hedgerow units, far exceeding the local and national policy.
- The retention of the majority of trees on the Site with substantial additional planting of 30 trees.

Therefore, the proposed development is consistent with the NPPF and local/neighbourhood planning policies and should be granted planning permission.

We trust that the above information provides sufficient clarification in response to the local resident comments received so far.

Yours sincerely,



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Graduate Planner
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For and on behalf of Avison Young (UK) Limited