



The countryside charity
Sussex

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Jonathan Ash Edwards,
Leader, Mid Sussex District Council,
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17th December 2022

By e-mail to: jonathan.ash-edwards@midsussex.gov.uk

Dear Mr Ash-Edwards,

2018 District Plan Review

I am writing to you on behalf of CPRE Sussex, the Sussex countryside charity.

We have today provided your Planning team with our views on the draft District Plan Review on which you have been consulting. I am attaching a copy of our submission for your information. As you would expect of the largest charity championing Sussex's wonderful countryside, one of our most valuable assets, we offer suggestions that we believe would improve the Plan. So we hope that you, your fellow Councillors and Officers will consider our proposals with an open mind.

Since that consultation exercise opened, the Department for Levelling Up, Housing and Communities has, as you will know, issued a Ministerial Statement as to its intentions to offer some relaxations to the inflexible and vexatious rules that dictate how an authority's housing needs are to be determined. CPRE has been working closely with Parliamentarians to secure these relaxations.

CPRE Sussex shares the view that you expressed to Mr Gove in the letter that you wrote to him on 22nd February that the standard method which your Council is required to use in calculating the District's housing need significantly exaggerates the housing shortfall through Sussex, and significantly over-estimates Mid Sussex's own new housing requirement. We also agree with your statement in that letter that there are insufficient sustainable sites within the District to deliver the arbitrarily exaggerated level of housing expected by virtue of that standard method.

Whilst the details of the relaxations remain to be clarified - and that may take some time - it seems clear to us that Mid Sussex is exactly the sort of authority that ought to be able to take advantage of them. It is, as you say, a rural district with very substantial constraints on its ability to deliver large scale development sites in sustainable locations (we say in our representations that the 20 minute community sites you propose in your draft plan are very definitely not sustainable locations). The current arbitrary standard methodology rules operate to dump far too much housing in this pressured part of the country at the expense of other areas where regeneration is much needed.

As it stands, your draft Plan Review, in seeking to follow the standard rules, proposes an impossible housing burden on the District, and seeks to solve their location problem by offering up far, far too

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much of our countryside on sites that don't pass the sustainability smell test. We anticipate that it won't pass the test of public acceptability either. And there is significant risk that the Planning Inspectorate will think that you haven't gone far enough to identify a sufficient number of homes or sites.

In these circumstances, may CPRE Sussex please urge you to follow the logic of your own February letter to Mr Gove by now withdrawing the draft Review Plan for reconsideration of its proposed housing and site allocation policies in the light of the 6th December LUHC Ministerial Statement. We note that some other councils have already taken this step. Please would you let us know whether you will be making an announcement to that effect.

If there is anything that you would like to discuss in this regard, please do get in touch.

Yours sincerely

Michael A Brown

On behalf of CPRE Sussex, the Sussex countryside charity