**Memorandum from CPRE Sussex (Representee No: 1189028) re Matter 3, Issue 2 (Spatial strategy soundness) at Stage 1 of the public examination of Mid Sussex DC's District Plan 2021 - 2039.**

**Matter 3: Vision, Objectives and Spatial Strategy.**
***Issue 2: Whether the Spatial Strategy is justified, positively prepared, effective, and consistent with national policy? Questions 33-43.***

1. In its Regulation 19 representations, CPRE Sussex challenged the soundness of the draft District Plan's spatial strategy, in particular its unjustified over-reliance on the allocation of large rural sites for housing rather than focussing more development in and around the District's existing larger towns which is what NPPF para 125 calls for. The Council's spatial strategy fails to promote the most effective use of the District's land, which is a cornerstone NPPF policy expectation – see NPPF para 119 (September 2023 version).

2. Density considerations and density standards required by para 125 are not addressed in the draft Plan. The opportunities for greater in-town and around-town housing growth rather than allocating 7 significant rural sites are inadequately explored.

3. The Plan's spatial strategy is not supported by the SA. Even without allowing for the distortions resulting from its flawed methodology, the SA's summary table 1 graph (p.60) that compares the SA's fourteen sustainability objectives as between the five appraised options, demonstrates that option 3 (Creating a new sustainable settlement with associated facilities) is easily the least sustainable of the five, and that option 4 (Focus development in the three towns utilising existing facilities and transport links) and option 5 (Prioritise development on brownfield land) are considerably more sustainable overall.

4. The Plan's heavy reliance on rural locations does not make efficient use of the district's limited unconstrained land or existing town-centre oriented infrastructure. It does not even pay lip service to the desirability of maintaining the Low Weald's prevailing character and setting around Sayers Common. As such it is incompatible with NPPF para 124.

5. Rural development necessarily involves relatively low density development, it involves very inefficient use of land for significant developments, the need to create from scratch new infrastructure and connectivities which would otherwise be available in existing communities.

6. An alternative special strategy of concentrating more development within and around existing larger settlements and brownfield sites (SA options 4 and 5), and avoiding large isolated rural sites, is the only effective and justified strategy that is consistent with the conclusions of the SA. There is scant evidence in support of the Council's claim that these preferable options, in combination, are not a viable strategy.

7. Take as an example the Martlets Centre in the centre of Burgess Hill. It is not even mentioned in the District Plan despite it being the largest brownfield site in the district, and a key part of Burgess Hill's town centre, an area that is in real, real need of regeneration, where the development of a carefully thought-out 20 minute community could provide a substantial planning solution. What is MSDC's justification for limiting its ambitions for the housing

component of the redevelopment of this key location to 172 privately rented flats without a single affordable home or even a £'s worth of infrastructure contribution? Where is the ambition? Where is the imagination? Where is the policy? There is not even a density standard against which to judge it.

8. We have been particularly concerned about the proposed allocation of the 5 sites at Sayers Common (DPSC3 -DPSC7) which are key allocations in terms of the Plan's spatial strategy.

9. The Plan's assumption that the 5 individual Sayers Common allocations (all in different ownerships) can be welded together into a sustainable 20 minute neighbourhood community, and the Plan's heavy reliance for its spatial strategy objectives on this being achieved, is totally unrealistic for evidence-supported reasons explained in detail in our Regulation 19 representations. No successful self-sustaining 20 minute neighbourhood has ever been established in a rural location anywhere to the best of our knowledge. The most authoritative UK study of 20 minute neighbourhoods, undertaken by the Town & Country Planning Association (https://www.tcpa.org.uk/collection/the-20-minute-neighbourhood/) offers no support for the concept in a rural context. MSDC has no developed masterplan as to how they would achieve their ambition, and have made no attempt to engage the local community in their proposed project. The Council's unrealistic challenge is made all the greater by the fact that the 5 sites involved do not form a coherent whole and are in different ownerships. These allocations do not support or further Plan objectives 2, 9, 10 or 12.

10. The representations made National Highways (Respondent Ref: 1191183) as to both the increased traffic flow impacts on the A23, and potentially key junctions onto the A23, and the ineffectiveness of sustainable transport mitigation proposals involving these allocations add further weight to our own concerns, and contradict from an authoritative source the SA's claim vis a vis these allocations that "*It is therefore considered that this [i.e. minor wording changes to the policy since Reg 18] would have a minor positive impact on climate change and transport* …." (SA p.B-75).

11. CPRE Sussex considers the proposed allocation of the sites DPSC3 – DPSC7 at Sayers Common, which the Council claims would create a sustainable 20 minute neighbourhood, is unsound. The Council has produced no robust evidence as to how they will achieve this objective, an objective fundamental to its new housing strategy. Allocation policies DPSC3 – DPSC7 in particular are neither consistent with the NPPF nor justified by the evidence in the SA or other robust evidence; and, on multiple other grounds, represent unsustainable, undeliverable, unjustifiable policy proposals pursuant to a flawed special strategy that is over-reliant on the allocation of large rural sites whilst giving no weight to environmental and infrastructure constraints.

12. We are unsure how far the Inspector will wish to address the soundness of the proposed DPSC3 – DPSC7 allocations at Stage 1. CPRE Sussex would seek the opportunity at an appropriate time to amplify our detailed Regulation 19 representations re these policies.

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**on behalf of CPRE Sussex, the Sussex countryside charity (Representee Ref No: 1189028)**
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