Memorandum from CPRE Sussex (Representee No: 1189028) re the Sustainability Appraisal questions 6 – 8 raised by the Inspector for Stage 1 of the public examination of Mid Sussex DC's District Plan 2021 - 2039.

Q6. *Is the non- technical summary suitably concise? Has the SA followed the correct processes in terms of content and consultation? In particular, is the scoring methodology within the SA consistent, coherent and accurate?*
Q7. *Have all reasonable alternatives been considered in terms of spatial strategy, policies, and sites including increases in density or housing numbers?*
Q8. *Have these reasonable alternatives, been considered on a like for like basis? Is the evidence on which the scenarios are predicated consistent and available from the Examination website? What is the significance if any, to the robustness of the SA, of the publication of additional evidence, such as transport and flood risk evidence after the Plan was submitted? Are there any policies, or strategies, where there were no reasonable alternative options to consider? If so, what is the justification?*

1 CPRESx has argued in its Regulation 19 submission that

(i) The methodology used in the Sustainability Appraisal (SA) has material flaws that result in its conclusions being inappropriately skewed in favour of development locations that cannot be evidenced as sustainable;
(ii) Despite these methodological flaws, the draft Plan's spatial strategy for new housing development is not supported by its SA, which concludes that the optimal sustainable strategy involves concentrating development on brownfield sites (where available) and within, and as extensions to, the District's main towns SA options 4 and 5). The creation of new rural settlements is shown in the SA (option 3) to be by far the least sustainable of the 5 new development options that it appraises.
(iii) the proposed allocation of the Strategic Sites at Sayers Common (DPSC3 – DPSC7) – a crucial feature of the Plan's special strategy - cannot create a sustainable "20 minute neighbourhood community". It is not supported by the SA; and is in any case not a justified policy.

2. As to methodological flaws, CPRESx's has a number of material issues with the SA of the housing policies in chapters 14 – 16 of the draft Plan Review on which your Council relies:

(i) We challenge the SA's reliance on its assumption (p.38) that an increase of 100 dwellings or more would necessarily be likely to have a major positive impact on the local housing provision. As a statement of fact, a large development must get one closer to achieving one's housing target. But as a metric for assessing sustainability of its impact, to assume in all cases a major positive outcome in advance, as the SA does, is pejorative. It assumes the answer that the SA is there to assess, and ignores the implications of the development: It isn't a positive impact for society if the large housing increase produces an unsustainable community outcome. Each case needs to be assessed separately.

(ii) Whilst it is true that negative biodiversity/geodiversity impacts would be expected where the following ecological designations may be harmed or lost because of proposals (p45),

it does not follow that negative impacts will not result from development on undesignated land, or that undesignated sites will be necessarily be more sustainable. The SA makes an unjustified assumption, particularly in its assessment of sites DPSC 1- DPSC7.

(iii) The impacts of development proposals on the natural capital assets and resources of allocated sites, and the potential loss of their economic value, is not part of the sustainability assessment. That is a material omission in respect of significant sites. The consequence of ignoring the economic loss from harm to natural capital assets and resources is to overstate - potentially significantly - the economic benefits of rural development. The principal result is that option 3, and to a lesser extent options 1 and 2, paint an overly positive picture for the natural resources, biodiversity, landscape and climate change metrics within the SA site analyses.

(iv) The unreliability of the subjective judgements made in the SA as to the degree to which given sustainability objectives are positively or negatively impacted by a given policy is exemplified by the disparity between the SA's assessment of the transport impacts of policies DPSC 3 – DPSC7 as all "minor positive" (SA p.B-75) whereas statutory consultee, National Highways, considers these policies to be unsound because of (a) there severe impact on the A23 peak flow traffic volumes and key A23 junctions and (b) the minimal likely impact of any sustainable transport mitigation given the remoteness of the sites' location from necessary facilities. We suggest that the opinion of National Highways on transport and traffic sustainability issues is to be preferred.

(v) The danger of relying on an overly simplistic SA assessment of individual metrics, demonstrated by the SA's ignoring the potentially show-stopping strategic road network impacts highlighted by National Highways, applies also to the biodiversity and landscape metrics whose individual policy evaluations are, as the SA authors point out, not informed by any separate ecological or landscape survey evidence; and whose reliability as evidence is therefore seriously questionable.

(vi) We challenge a number of the features of the analysis of sustainability of Option 2 listed on pages A16 - A22 of the SA.

3. The SA is unjustly skewed in favour of the sustainability of Plan Review housing policies and site allocations as a result of these material shortcomings. These flaws, and the way that they have been misused to support their appraisal of key sites, significantly undermine the SA's general credibility.

4. The practical impact of these shortcomings in the SA methodology on the Plan's overall spatial strategy, leading to the Plan's over-reliance on the allocation of large rural sites for new housing rather than in-and around-town expansion, is something that we hope to have the opportunity of addressing when the hearings deal with the Plan's spatial strategy (Matter 3 Issue 2). We are submitting a separate short memorandum on that issue in anticipation of that hearing.

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