

CPRE Mid Sussex input to Mid Sussex District Council's draft District Plan (January 2012)

The Mid Sussex branch of the Campaign to Protect Rural England, which campaigns to protect Mid Sussex's countryside, submitted detailed comments to Mid Sussex District Council (MSDC) on its consultation draft District Plan 2013 - 2031. These are the key features of our submission:

1. We welcomed the Plan's strategic objective of promoting the District's self sufficiency, and made a number of suggestions as to how that aim could be achieved, including policies that would tie approval of new housing development to prioritisation of brownfield sites, the creation of new local job opportunities, and improved benchmarking of the Plan's performance against its strategic objectives.
2. Our wonderful local countryside needs better protection via a new natural environment policy. It is all too widely assumed that nature comes free, that there is no cost to us if it is lost and that there is no charge to restore it. So we strongly supported proposed Plan policies insofar as they would protect of the countryside from intrusive new development, whilst bolstering a thriving rural economy. However we were concerned that the Plan should reinforce the leadership role of the Council in ensuring that ours will become the first generation to leave our natural environment in a better state than we inherited it, climate change notwithstanding. The purpose of our proposals would be to ensure that the ecology, biodiversity and tranquility of the countryside as a whole are safeguarded and wherever possible enhanced over the life of the Plan, and that their benefits remain an integral part of all MSDC's future development approval decisions.
3. CPRE's role is not such that it commented on the specific proposals in the Plan on the location of new development. We did however offer suggestions as to how the evidence supporting MSDC's conclusion that 10,600 new homes should be built within the District should made more robust; and argued that the overall housing number should be expressed as a cap on the amount of new housing that is deemed sustainable over the life of the Plan in order to protect the District from further intrusive development.
4. As we did not consider that the current draft Plan (as at October 2011) catered for the possibility that MSDC could be required to deliver significantly more than 10,600 new homes, we invited MSDC to consider preparing a fall back plan to address that contingency, so as not to risk having to withdraw its current Plan at its public examination.
5. We expressed concern at the fact that the draft Plan had been prepared in advance of key evidence that should be shaping it, particularly regarding the District's infrastructure deficit, and what improvements would be needed to meet new development challenges. Local infrastructure must be capable of supporting the level and location of any new development under the Plan; but the Plan risked exacerbating already existing problems in some parts of the District of traffic-induced congestion, air pollution and water resource shortages. A development which does not lead to improved facilities and an enhanced local ecology is not a sustainable one.

6. We encouraged MSDC to be bolder in a number of its specific Plan policy proposals:

- we asked MSDC to strengthen its policy on shops in village communities by asking MSDC to work with parish councils involved to ensure the preservation and promotion of the village retail outlets, including a commitment to fight to maintain post office and banking facilities; their proposal simply to “define a network and hierarchy of village centres” was not good enough. We also wanted the introduction of faster broadband facilities in rural communities to be given higher priority;
- we were concerned that Plan policies would not avoid the progressive degradation and loss of community facilities;
- we flagged that insufficient weight was being given to the ecological and environmental implications of the development proposals around Burgess Hill;
- whilst we naturally supported proposals to prevent coalescence between urban communities, we considered that the specific policy proposed offered inadequate protection and contradicted other policies on the protection of the countryside;
- we argued that the proposed transport policy needed to be more assertive in requiring new commercial and housing development proposals to be tied to plans to reduce private car dependency;
- we asked that the policy on rights of way be extended specifically to protect ancient routeways and droveways, which are a particular feature of the Sussex countryside;
- MSDC’s responsibility to forge links between the countryside and people’s well-being needed highlighting;
- MSDC should set a timetable to draw up and publish proposals for the preservation and enhancement of all local conservation areas. There are 36 in Mid Sussex, but to date reviews have only been completed of 4 of them;
- whilst we were pleased that MSDC was responding to the threat of climate change with proposals on sustainable resources, renewable energy and flood protection we urged additions to, and monitoring of, these proposed policies to ensure that they would be effective;

7. The Plan lacked a policy on sustainable waste disposal and recycling. That should be rectified.

8. Two areas on Ashdown Forest are designated under European legislation as requiring special protection of rare local breeding birds (nightjars and Dartford warblers) and of their unusual habitat. MSDC is legally required to avoid development proposals which could have a significant impact on those protected sites, and to assess that impact before finalising its District Plan. An interim assessment identified that traffic pollution levels already exceed critical levels and that more visitors to the Forest could be detrimental to the protected birds. We were critical of the assessment process on a number of important grounds, which risked the Plan allowing a far greater level of development around those sites than it should, with potentially ineffective mitigation.

9. We questioned whether it was sensible for MSDC to try to finalise its District Plan as fit for public examination before most of the towns and parishes had developed or consulted locally on their neighbourhood plans, before a habitats regulation assessment based on defined development growth levels and the effectiveness of proposed mitigation measures could be completed, and whilst the detail of new national planning policy guidance remained so uncertain.

10. We invited MSDC to discuss our submission with us, and how our proposals could be best built into the District Plan.

CPRE Mid Sussex’s full submission to Mid Sussex District Council on its draft District Plan can be viewed on the CPRE Sussex website at www.cpresussex.org.uk.