



The countryside charity
Sussex

CPRE Sussex

www.cpresussex.org.uk

27th October 2021

Ms Charlotte Glancy, Banks Solutions by e-mail to: bankssolutionsuk@gmail.com

Dear Charlotte,

Mid Sussex DC Sites Allocation DPD - Post hearing action point 20 (re draft policy SA38)

The Inspector invites responses from interested parties to the post-hearing action point documents.

In response to a request from the Inspector, recoded as action point 20, CPRE Sussex provided suggestions for the kind of air quality policy that would meet the NPPF tests of soundness including the requirements that it must be positively prepared and must address the various minimum statutory requirements as well as those of the NPPF itself. Those suggestions appear in our representation document 0689-005 dated 21 June 2021. We have not claimed that they would necessarily be justified in their drafted form by evidence, as we do not have that evidence; but they aim to point to the kind of clear, comprehensive and compliant policy that is lacking in draft policy SA38.

The Council has responded to our suggestions in its document MSDC-18. CPRE Sussex considers that MSDC's wholesale dismissal of our good faith suggestions, even as a basis for further discussion, demonstrates disappointing complacency on an issue of public health and of considerable public concern. Their position that further revision of SA38 would require more work and more evidence (para 2.2 of MSDC-18) is no justification for acceptance of a policy that is unsound as it stands.

Perhaps more to the point MSDC's response fails to address the point that its own draft SADPD policy SA38 does not meet the minimum NPPF policy requirements, which we rehearse in CPRE's above 21 June submission document at para 7. Nor, as we have argued, is SA38 positively prepared or justified. Indeed, it is not even clear what the policy is.

We again call on the Inspector to require MSDC to modify its draft policy SA38 in such a way as to make it legally sound and comprehensive, preferably for incorporation into the adopted SADPD or, failing that, as part of its District Plan review.

Yours sincerely,

Michael A Brown
On behalf of CPRE Sussex, the Sussex countryside charity
www.cpresussex.org.uk

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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