

Draft South East Plan: Comments Form

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Respondent No:

Comment No:

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Acknowledged:

If you wish to comment on the Draft South East Regional Spatial Strategy (RSS), please:

- Complete all relevant details in Section A – this need only be done once irrespective of how many parts of the RSS you wish to comment on.
- Complete a separate page 2 of the form for each part of the RSS you wish to comment on. Ensure you insert your organisation name (or surname if responding as an individual) on each page 2 and complete Sections B, C & D. You may make copies of this form.
- Type or print clearly in black ink.
- Note that all comment forms will be made available for the public to read – they cannot be treated as confidential.
- E-mail or post (please do not send duplicates) the completed forms to be **received by the Panel Secretary before 5.00pm on Friday 23rd June 2006**. E-mail responses will be acknowledged immediately. Do not return your forms to the Regional Assembly.

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Section A

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To ensure your comments are taken into account this form must be completed and received in the Panel Secretariat's Office by 5.00pm on Friday 23rd June 2006.

Signature.....

Date.....21st June 2006.....

Would you like to be notified of the publication of the Government's proposed changes and the final South East Plan?

Yes

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	
Paragraph No. ; or	Text in paragraphs 2.1 & 2.2 of the Core Document "Issues and Challenges" (page 7)
Chapter No.	

Section C

Oppose the statistic used in paragraph 2.1 that 90% of the region's land mass remains undeveloped. Furthermore paragraph 2.2 oversimplifies the issues.

Section D1

Even if the figure of 90% of the South East being undeveloped, which is questionable, it is far from helpful as any form of guide to what development may be appropriate in the future. A far more realistic guide would be the ecological footprint of the development that is on that suggested 10% of the land. SEERA's own document "Taking Stock" is useful here. Although probably an underestimate, at least it uses a standard methodology to estimate the environmental impact of activity in the South East. In this case it is 29 times the physical area of the region.

Section D2

Wording should be included in paragraph 2.21 to stress the size of the problem that spatial planning will have to address in the next 20 years, perhaps along the following lines:

Whilst the physical area of developed land might only be 10% of its land surface, the environmental impact of activity in the South East is 29 times the physical size of the Region. This underlines the size of the changes that are necessary, in terms of reduced resource use, reduced pollution and waste, and the level of environmental enhancement needed, in order to build a region that is truly sustainable for the next 20 years.

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support and Oppose
Policy No. ; or	CC1 Sustainable Development
Paragraph No. ; or	
Chapter No.	

Section C

The leading emphasis on sustainable development is welcomed. However the SEEDA document "Taking Stock" indicated that the ecological footprint of the south East was 29 times larger than the physical area of the region. Thus our current behavior is well outside the limits of sustainability but the scale and urgency of action needed to redress this does not come through in the Plan.

Re-wording of the policy would place it more in line with national definitions.

Section D1

We believe that the policy will be strengthened significantly by ...

- Modifying the order of the list to more accurately reflect the shared UK principles of sustainable development which sets the high level objectives "... to live within environmental limits and achieve a just society ... by means of sustainable economy, good governance and sound science."
- Adding specific reference to the priority actions agreed at national level.

Section D2

The policy would benefit from the following changes:

First paragraph:

... The strategy and policies of the Plan promote measures that contribute to:

- Living within environmental limits; and
- Ensuring a strong, healthy and just society;

with particular emphasis on

- Achieving a sustainable economy;
- Using sound science responsibly; and
- Promoting good governance.

Second paragraph:

" All public authorities shall ensure that their actions contribute to meeting the objectives set out in the (IRF). **As a priority, public authorities will focus on actions related to:**

- **Sustainable consumption and production;**
- **Natural resources protection and environmental enhancement;**
- **Building sustainable communities (from local to global levels);**
- **Climate change and energy.**

In addition, public authorities will promote actions and measures that encourage changes in individual, societal and corporate behavior that underpin sustainable development."

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support and Oppose
Policy No. ; or	CC2 Climate Change
Paragraph No. ; or	
Chapter No.	

Section C

The strong policy on climate change is welcomed. The Plan recognizes that climate change will have an impact on spatial planning beyond the lifetime of the Plan. It is therefore recommended that a long term target of at least a 60% reduction in greenhouse gases by 2060 should be incorporated.

The policy is, however, light on adaptation to climate change. There needs to be a target towards creating a more ecologically viable region that is better able to adapt, environmentally, to climate change. This should be linked to requirements in PPS9 and principles in MRM4 of this plan

Section D1

The region is committed to a certain level of climate change even if greenhouse gas emissions stopped tomorrow. A key element in the plan should therefore be towards the construction of an environment that is better able to adapt. This should include several elements. Large ecologically viable ecosystems should be developed, throughout the region, that are able to function naturally within a changing environment. These, along with a range of other important wildlife sites, should form nodes within a wider ecological network extending across the region and linking with similar networks in adjacent regions. In addition, the wider landscape, in both rural and urban areas, should be subject to low intensity, ecologically sensitive management. Our current landscape, though not devastated, is fragmented and contains environmental assets that are ecologically isolated. In a changing environment these will have limited ability to adapt and are bound to degrade. This will have major environmental repercussions and, through a reduction in the ability of the environment to deliver ecosystem services (prevention of flooding, nutrient cycling, soil conservation, clear air etc), will have subsequent social and economic repercussions.

Section D2

The second section in CC2 should have a sub section stating that:

Improving the ability of the environment to adapt to climate change will be achieved through ensuring that opportunities are identified and promoted regarding the development of large scale ecologically viable ecosystems within an interconnected ecological network and in a landscape of low intensity, ecologically sensitive land management. The aim of this will be to deliver a region where species and habitats are able to move, migrate, change and adapt to change and so continue to support natural processes and deliver ecosystem services.

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support
Policy No. ; or	CC3 Resource use
Paragraph No. ; or	
Chapter No.	

Section C

This policy is strongly supported. Reduction in resource use at least as ambitious as those suggested here are essential for the long term sustainable development of the region.

We are concerned, however, that this will be undermined by a range of policies elsewhere in the plan. This is one of the areas where the detailed policies in the plan area at complete variance with a cross cutting policy that is supposed to guide the whole plan.

Section D1

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support and Oppose
Policy No. ; or	CC4 Sustainable Construction
Paragraph No. ; or	
Chapter No.	

Section C

We support the policy in general but consider that there should be a greater commitment in all development for high quality development. At present the EcoHomes Excellent and BREEAM standard are relevant but these should also be exceeded within the lifetime of the plan. Hence the proposed wording below.

A longer term commitment should be made towards delivering development that is carbon and water-use neutral, and produces zero waste

Section D1

Section D2

Delete sub-paragraph i and replace with:

At least adhering to and preferably exceeding EcoHomes Excellent standards or equivalent for residential developments and BREEAM standards for other developments

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	CC5
Paragraph No. ; or	
Chapter No.	

Section C

The Sustainable Communities plan, and other documents, have made clear the very great importance of the appropriate and timely provision of green infrastructure as part of any new development, from the points of view of biodiversity enhancement, ecosystem services (such as flood-risk management and climate amelioration) and quality of life.

Section D1

The nature of green infrastructure and its links to large scale viable ecosystems, ecological networks and low intensity environmentally sensitive management in the wider landscape should all be articulated in the supporting text.

The term "Infrastructure" is not defined in the Core Document although it is in the Implementation Plan. The Core Document itself should include a definition of Infrastructure. Policy CC5 is where such a definition should be found.

The definition could be improved by making it clear that the examples given are only examples. Green infrastructure also includes the entire functioning environment that provides all the ecosystem services that we require for existence as well as our sense of well-being.

Section D2

It should be made clear that all sub-sections in CC5 relate to the provision of green infrastructure alongside other traditional forms of infrastructure. Investment programs, Local Development documents, planning conditions and developer contributions should all refer to a requirement to deliver green infrastructure.

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support
Policy No. ; or	CC12
Paragraph No. ; or	
Chapter No.	

Section C

We welcome this policy

Section D1

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	H1, Housing
Paragraph No. ; or	
Chapter No.	

Section C

It is not possible to deliver this level of housing development whilst still complying with the over-riding policies CC1, CC2, CC3 and CC12, and there is little indication of cross-compliance with development standards in CC4

Section D1

We do not oppose all house building in the region, however, the huge housing allocation appears to be based on the principle of attracting a large amount of immigration to drive the economic growth of the region, and hence act as the economic hub for the rest of the UK. This results in a continuous physical growth agenda which is contradictory to sustainable development.

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	T9, Airports
Paragraph No. ; or	
Chapter No.	

Section C

Air travel is one of the greatest causes of increasing emissions of greenhouse gasses. Support for continuous growth of these airports, even within currently agreed levels of growth, is not consistent with policies CC2 or CC3.

Section D1

In addition to the severe climate change and resource use problems with air travel there is the long term problem of energy shortage within the life time of the plan. It is unlikely that increasing oil prices will allow air travel to remain an economic proposition over the next 20 years and (arguably) unlike other energy users, it is unlikely that there will be any alternative to oil as a fuel source for air travel. Hence a long term plan involving airport expansion is likely to be economically highly dubious as well as environmentally damaging.

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support and Oppose
Policy No. ; or	NRM1 Sustainable water resources
Paragraph No. ; or	
Chapter No.	

Section C

In a water stressed region, sub section iii should be firmer in requiring higher standards of development. This should not be limited to "development that would use significant quantities of water".

Section D1

Section D2

Recommended alternative wording for NRM1 iii:

Require all development to incorporate measures to achieve high levels of water efficiency, and achieve current best practice including BREEAM or EcoHomes "excellent" standards.....

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	NRM2, Strategic water resources
Paragraph No. ; or	
Chapter No.	

Section C

The environmental acceptability of water resource development should be assessed before the Plan makes a commitment to a level of water provision and this in turn should determine the amount of development that is environmentally sustainable.

Section D1

Current planning for water resource development is the opposite of sustainable development. The approach is entirely demand led, development levels being set and then water simply has to be provided. The environmental acceptability of any water resource development becomes a secondary issue as the commitment to water provision has already been made. This is the case for proposed resource development in Sussex. Bewl reservoir, Clay Hill reservoir, enlargement of Darwell and a new resource in north-west Sussex may all be environmentally unacceptable yet the plan seems committed to them before and environmental appraisal is completed.

The last paragraph and sub-sections of the policy is however, more acceptable in principle although the level of commitment required should be stronger. Alternative wording is suggested below.

Section D2

The final main paragraph of Policy NRM2 should be modified to read:

In considering applications for new water resource schemes, local authorities should ensure that:

- I. Need at local, sub-regional, regional, and inter-regional scales is understood and has been demonstrated
- II. All alternative options, particularly water efficiency in new and existing properties, have been explored and, so far as practically possible, delivered
- III. They are effective in minimising negative environmental impacts and will deliver social and environmental benefits.

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support and Oppose
Policy No. ; or	NRM3 Flood risk management
Paragraph No. ; or	
Chapter No.	

Section C

We support this policy and note the vulnerability of major urban areas on the Sussex Coast to flood risk over the Plan period arising from Relative Sea Level Rise and Climate Change.

Section D1

The policy and supporting text, however, are focused on flood risk in relation to development. It should, however, link in with a wider land use agenda. Flood risk management will involve coastal and riverine re-alignment. This may have negative repercussions on the location of development, meaning that even some existing settlements may have to be relocated. It will have further repercussions in terms of an environmental vision for the region with a need to identify areas for habitat migration and areas of opportunity for environmental restoration (especially for wetland habitats). This will link in with existing policy NRM4 and the recommended changes to CC2 (above) in relation to large viable ecosystems and ecological networks. As well as being an important environmental aspect, this is vital from a social and economic standpoint. Poorly performing habitats will deliver poor ecosystem services (such as flood amelioration and water provision).

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support and Oppose
Policy No. ; or	NRM4 Conservation and improvement of biodiversity
Paragraph No. ; or	
Chapter No.	

Section C

We welcome Map NRM4 and the accompanying policy. Nevertheless, the Sustainability Appraisal indicates that the SE Plan is likely to have negative impacts on biodiversity. One critical method for addressing this will be through this policy. It is notable that local authorities are directed to make provision in planning documents, for example, for a set number of new dwellings, and to ensure that plans are in place to deliver them. In contrast, local authorities are tasked only with pursuing opportunities for biodiversity gain. This imbalance in the Plan could be overcome by stronger wording as recommended below.

Section D1

Inevitably such strategic maps are of a generalised nature. This map therefore requires tighter focus at Sub Regional and LDF level. We recommend that this approach be worked up to provide guidance on its implementation at a variety of levels from regional to sub-regional and then to local levels. This should develop the concepts of ecological networks and large viable ecosystems as mentioned in comments to CC2 (above).

It is a concern that habitat fragmentation, and its repair, is not specifically mentioned in the policy. This should be addressed in order to comply with PPS9 and the England Biodiversity Strategy.

We are concerned that the Implementation Plan does not identify how this policy will be delivered.

Section D2

Some of the shortfalls of the policy could be avoided by altering wording as follows:

First paragraph:

...local authorities and other bodies shall **prevent** a net loss of biodiversity and **will make provision to achieve** net biodiversity gain through.....

An extra line of policy should be added to cover:

Actively working towards regional and national biodiversity targets and objectives through their planning and other functions.

Sub section iv could be improved as follows:

.....Identifying in their plans and policies areas of opportunity for biodiversity improvement and setting targets reflecting those in figure NRM2. Opportunities for biodiversity improvement, including large scale habitat restoration, linkage, enhancement and re-creation, should be identified and realised, especially in the areas of strategic opportunity for biodiversity improvement (as identified and described in Map NRM4 and accompanying text).

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support
Policy No. ; or	NRM5 Woodlands
Paragraph No. ; or	
Chapter No.	

Section C

This policy is welcomed but should not be used to infer the de-prioritization of other habitats. Also safeguard should be stronger to ensure that unwooded habitats are not put at risk by a policy promoting tree planting.

It is also a concern that woodland expansion in the past has occasionally been non-strategic, has not always delivered opportunities as it should have and has occasionally been counter-productive. Policy could be re-worded to ensure a better strategic fit with environmental enhancement.

Section D1

Section D2

Sub section ii should include the following elements, if necessary dividing the sub-section:

Woodland expansion should be promoted in areas where this does not conflict with other nature conservation or landscape objectives.

Extension and creation of woodland should be part of wider strategic landscape and habitat enhancement, restoration, de-fragmentation and re-creation.

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support
Policy No. ; or	NRM6 Coastal management
Paragraph No. ; or	
Chapter No.	

Section C

Section D1

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	
Paragraph No. ; or	Countryside and Landscape Management chapter, introductory text, paras 1.1-1.4 (pp 174-175)
Chapter No.	

Section C

This text give very little background and no overall impression of the landscape of the region, acknowledged in other parts of the document as one of its most important assets. This section contrasts with, for example, D2 on the economy, where there are several pages of information, tables and diagrams to give a good overall impression of the region's economy.

Section D1

This section lacks an introduction describing the variety and high quality of the South East's landscape character to give a sense of what the region is like physically. Including a map showing the region's landscape character areas, along with supporting text, would provide some context to the landscape policies and help in the understanding of the needs of the area and the threats that it faces. A section along these lines is vital not only for this section but in order to set the context for the whole plan.

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	C1b The South Downs
Paragraph No. ; or	
Chapter No.	

Section C

This policy seems rather confused. It does not add anything over what is already covered by C2 yet leaves a large tract of the proposed National Park (currently laying outside the AONBs) with no more protection than other areas of general countryside.

Section D1

The supporting text in section 1.8 may also need re-drafting in order to make clearer the background regarding the Designation Order, the confirmation of the Order and what happens in the interim before the order is confirmed to areas of the future National Park both within the current AONBs and outside the current AONBs.

Furthermore the South Downs National Park covers many Local Authority areas and two AONBs, and influencing a much wider area in that general part of the region. As a National Park it will be a major driver to the social, economic and environmental agenda for the area. There is therefore a strong argument to develop a sub-regional plan for the South Downs and its environs.

Section D2

The current policy should be amended to include the following element:

...planning authorities will not grant planning permission for any development that would prejudice the designated South Downs National Park and its purposes.

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support and Oppose
Policy No. ; or	C2, AONBs, and supporting text in para 1.9 (Core Document p 176)
Paragraph No. ; or	
Chapter No.	

Section C

This policy is supported in principle but there is a difference in the level of protection given to AONBs by this policy, and the level of protection give to national Parks as in C1a. Thus in the new Forest NP “high priority” is given to conserving and enhancing land , whereas in C2 only “priority” is given to the same thing. A subtle distinction perhaps but government policy is to give these two categories the same level of protection at least at a policy level.

Section D1

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support
Policy No. ; or	C3 Landscape and Countryside Management
Paragraph No. ; or	
Chapter No.	

Section C

Section D1

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	
Paragraph No. ; or	
Chapter No.	SECTION E2

Section C

Levels of growth and development, and their design, will conflict with over-riding regional policies including CC1, CC2, CC3 and CC12.

Section D1

While cross cutting policies promote reduction in resource use, control of climate change and sustainable development, the text and policies in this section represent a demand-led approach that is inconsistent with sustainable development.

The implementation plan is particularly worrying in that it is totally dominated by transport, and transport is dominated by road schemes, whilst the subject of green infrastructure (even bearing in mind the Plans current limited definition) is not even mentioned, let alone costed.

Furthermore other policies such as CC12 and NRM4 promote the seeking of opportunities for environmental enhancement. This should be focussed and developed in a sub-regional section. The sub-regional level is the level at which a spatial environmental vision should be created, articulating the physical values of the area with plans for large scale habitat restoration and creation, including large viable ecosystems. The Sussex Coast area is a prime candidate for the description of an ecological network, with clear areas of opportunity along the coast, around wetlands and extending up river valleys. Further opportunities lie with woodland expansion, inter-linkage and management, with knock-on economic and social benefits from the production of wood products. Opportunities also exist in expanding grazing initiatives along the South Downs and in other grazed habitats to link the value of the area for tourism with the production of local products (such as south downs lamb and Sussex cattle). The Plan remains silent on all of these issues and instead we are given a picture of traditional, urban-based unsustainable development with the environment presented as a constraint.

Section D2

The section should be redrafted to present environmental objectives and to present the environment as an asset of value to society and economy. The concept of an ecological network should be articulated at sub-regional level, working in concepts such as the response to climate change, migration of habitats and ecosystem services.

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	The Sussex Coast, SCT1, Core Sub-Regional Strategy and supporting text sections 1.1to 1.3.
Paragraph No. ; or	
Chapter No.	

Section C

These sections and policy are opposed as they under state and under value the environmental assets of the area. They focus on the environment as a constraint and say little about the environment as an asset. They also focus, as in the past, on strategic transport infrastructure when local transport, modal shift and public transport are more likely to effective.

Section D1

These sections under state the area as only two of the thee AONBs are mentioned (Chichester Harbour is left out) and two of the main environmental constraints (Special Protection Areas and Special Areas of Conservation) are not mentioned. This is highly important as these will guide Appropriate Assessment and spatial planning.

They under value environmental assets as the emphasis regarding the environment focuses on the constraint to development, it ignores the economic potential of, for example, high quality landscape associated with the South Downs.

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	SCT4, Employment priority in land allocations
Paragraph No. ; or	
Chapter No.	

Section C

Policy is set in conjunction with policies RE2 and C2. C2 only relates to AONBs, SCT4 should also be set in conjunction with priorities set in C3.

Oppose SCT4 ii. This is a policy to contradict other policies.

Section D1

Apart from the Cross Cutting policies, all policies should be balanced against one another; there not should be one favoured policy that overrides others. Policy SCT4 ii simply lays the ground for an extremely light test to push aside all polices for environmental protection in the sub-region. This policy is the logical result of seeing the environment only as a constraint, without taking up opportunities to treat it as an asset. It exposes weaknesses in the whole section.

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	STC7 Housing development
Paragraph No. ; or	
Chapter No.	

Section C

This level of housing cannot be provided without conflicting with cross-cutting policies such as CC1, 2, 3 and 12

Section D1

The Plan requires provision to be made for over 54,000 houses along the Sussex Coast. If placed together this would be 25% larger than the current size of Worthing. Under the current strategy this would infringe environmental limits, will add to the problems of climate change, increase resource use and would mitigate against environmental enhancement in just those locations where coastal realignment and habitat migration are essential.

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	SCT9 Infrastructure
Paragraph No. ; or	
Chapter No.	

Section C

This policy, and the implementation plan, does not include Green Infrastructure

Section D1

This policy should be amended to include specific reference to Green Infrastructure and its enhancement as part of environmental improvement for the area. This should link in with policies CC12 and NRM4, and our comments regarding ecological networks in CC2, NRM4 and in general comments on section E2 (above)

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	
Paragraph No. ; or	
Chapter No.	Section E9

Section C

This section presents the environment in a far more positive light than does the Sussex Coast Sub-regional strategy and this is welcomed. However, green infrastructure is not developed as a concept. The lead given in NRM4 and some cross-cutting policies is not adequately picked up in this section

Section D1

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Oppose
Policy No. ; or	GAT2
Paragraph No. ; or	
Chapter No.	

Section C

This proposes a high level of development in a small, predominantly rural area. GAT2 clearly aims to deliver this level of growth with as little environmental damage as possible. Nevertheless, the absolute level of development proposed for the area is still bound to increase resource use and add to climate change. Hence it will greatly increase the regions ecological footprint at a time when we should be reducing it.

Section D1

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support
Policy No. ; or	
Paragraph No. ; or	
Chapter No.	Sustainability Appraisal, Non-technical Summary: Conclusions

Section C

The general conclusions of the Sustainability Appraisal area supported.

Section D1

We would like to emphasis the following points, highlighted in the conclusions of the Sustainability Appraisal:

- The Plan will result in increased resource consumption (including water), increased waste (and pollution) and loss of biodiversity.
- The Plan will increase the ecological footprint of the region.
- There are no policies, targets or mechanisms to reduce the regions ecological footprint, in spite of aspirations in the cross-cutting policies.
- Behavioural change whilst welcome if it happens is unlikely to be stimulated or delivered by policies in the Plan.

Section D2

Comments from (Organisation, or surname)..... **SUSSEX WILDLIFE TRUST**.....

Section B

Support or oppose (please specify)	Support
Policy No. ; or	
Paragraph No. ; or	
Chapter No.	Sustainability Appraisal, Non-technical Summary: Recommendations,

Section C

The general recommendations of the Sustainability Appraisal area supported.

Section D1

In particular we would like to highlight the following recommendations:

- A sustainability appraisal of the implementation plan should be carried out.
- Ensure that cross-cutting policies are adequately embedded in the sectoral policies.
- A new section on Climate Change should be produced. We would add that this should bring together and re-enforce policies in the current Plan and furthermore should develop the concept of building an environment that is robust to climate change. (See our response to policy CC2).
- A system should be developed for assessing the compliance of LDFs with the Regional Policy Framework.
- The Regional Observatory should collect data to assist monitor progress towards sustainability. We would add that the Local Biodiversity Record Centres are vital parts of this information network and should be adequately funded.
- Much work needs to be done to take forward the issue of behavioural change.

Section D2

Please ensure that you have written your name at the top of the page. Completed forms should be received in the Panel Secretariat's Office by 5.00pm on Friday 23rd June 2006. Late responses, other than those requested by the Panel, will not be accepted.