

The following table details the Sussex Wildlife Trusts comments on specific policies in the South East Plan:

Policy		Comments
<b>CROSS-CUTTING THEMES</b>		
CC1	Active management	This policy is open to misinterpretation. Land and resource management is a broad area and it is vital that the natural environment and natural resources are given due weight. The text or the policy itself should specifically highlight the natural environment and so integrate plans for biodiversity.
CC2	Climate change	<p>The plan fails to grasp the implications of climate change. The effects could result in global instability in a variety of areas, any one of which could have major implications for the environment and economy of the south east. For example global agricultural productivity could be less predictable, extreme events will effect insurance rates and there could be major effects on the exploitation and transport of resources. The plan should:</p> <ul style="list-style-type: none"> <li>• Give ambitious targets for reduction in energy use</li> <li>• Give ambitious targets for transfer of energy generation to renewable sources</li> <li>• Promote a major reduction in transport footprint.</li> <li>• Promote the development of a significantly enhanced ecological network such that the south east environment is robust to unpredictable changes.</li> <li>• Present a spatial vision for landscape enhancement.</li> <li>• <u>Enforce</u> environmental mitigation alongside development.</li> </ul>
CC3	Resource use	<p>Whilst this is an essential and very welcome ethic, this is not carried through elsewhere in the plan, indeed the whole policy direction of the plan would run counter to this cross-cutting theme. It is impossible to see how we can stabilise the ecological footprint of the region whilst also delivering policies elsewhere in the plan. As a basic minimum, <u>national</u> building regulations should require at least the “very good” standard and the South East region, as the most heavily stressed by development pressure, should be aiming for far higher.</p> <p>This should be one of the driving policies in the plan. All other policies should be seeking to deliver this aim. This is not the case at present.</p>
CC4	Infrastructure	<p>The Plan recognises the need for infrastructure alongside development but makes the assumption that this can be provided by increased investment. No doubt careful investment is <u>part</u> of the answer but the plan seems to pay no regard to the finite nature of the resources and natural environment of the south east. However careful the investment, or advanced the technology, there are still physical and environmental problems with lack of space for transport, absolute lack of water availability, lack of holes in the ground for waste residue and so on. The policy should recognise that there are constraints on the provision of infrastructure that go beyond funding matters.</p> <p>The need for infrastructure should be integrated with any development proposal. An EIA must be done of the whole proposal to assess whether it is environmentally sustainable, rather than being seen as a separate issue.</p> <p>The plan occasionally mentions the need for green infrastructure, this should be made more explicit and be given more explanation. It should be linked in with the delivery of</p>

		biodiversity objectives and should become more of a feature in the overall spatial vision.
CC5	Public land	The current policy is presumptive, promoting the view that the only alternative use for public land is for development. Public land should be seen as an opportunity against the range of objectives in the plan. Access could be improved and protection for species and habitats afforded. Much of this land is of great importance to people and wildlife and should be assessed on a site by site basis. This is symptomatic of how the plan has no spatial vision apart from for development.
CC6	Inter-regional connectivity	Much of the demand driving this strategy derives from adjoining regions - i.e. London (particularly housing). Whilst this policy provides interesting text it does not give policy direction. It does not state what needs to be done so provides no guidance on what planning authorities should do in relation to cross cutting regional issues like the Thames Gateway.
CC7	Urban focus	This general approach is supported but each proposal must be individually assessed and ecological surveys undertaken <u>before</u> allocation. Green space in urban areas is critical to social and economic well being and brown field sites can be of greater importance to biodiversity than some green field sites. Access to green space in urban areas and surrounding countryside should be increased. There should therefore not be a general presumption in favour of developing all brown field sites.
CC8	Spatial emphasis	The policy is led by an emphasis on growth, economic regeneration and economic opportunity and fails to acknowledge the principles of sustainable development. Unacceptable environmental damage may result from focussing only on socio-economic needs - therefore this is not a sustainable approach to planning. There should be a spatial emphasis for other objectives in the plan, such as for resource use and the response to climate change.
CC9	Green belts and strategic gaps	<p>These are important for species movement, habitat migration (mitigation for the effects of climate change) and for access to green spaces for the local community. On a District/Borough level strategic gaps are constantly under pressure for development. Indeed much of this land is owned by developers. This protection must be at the LDF level if it is to be effective.</p> <p>Elsewhere the plan refers to the need to infringe environmental constraints in order to satisfy development desires. Already we are seeing LDDs downgrade strategic gaps forcing a false choice between maintaining the gaps or providing homes. It seems that this policy is very easily compromised away.</p> <p>The policy is unacceptably weak with words such as “inappropriate” left in without definition.</p>

Though the cross-cutting themes apparently set a context for a more sustainable approach to development, it is clear that any of the sub-regional strategies will run contrary to the good words in these themes. For example the strategy for the Sussex coast plans for up to 3000 homes to be built per annum, supported by expansions in infrastructure (for example for transport, water provision, waste disposal etc) and allocations for economic development. This is in a narrow strip of land mostly located between a future National Park and the sea, with small remaining strategic gaps. Furthermore, much of the land is liable to flooding, water resources are the most constrained in England and the area contains a large number of nationally and internationally important sites for biodiversity. The practice of this strategy will be to hugely increase greenhouse gas emissions, increase resource use, is so constrained in space that active management of environmental resources will be difficult and will effectively infringe environmental constraints such as strategic gaps and the protection of the most important wildlife sites. There is little sign of the sustainable development principles highlighted at the beginning of the document.

## THE REGIONAL ECONOMY

RE1	Sustainable economic development	Economic development can only be classed as sustainable if it also delivers social and environmental gain. Indeed the emphasis of the policy and the supporting text should be reversed, it should be led by social and environmental objectives and it should be the job of the economy to deliver these objectives. The economy is not an objective in its own right, it is the means for delivering an equitable distribution of wealth along with social and environmental objectives. Thus the policy should emphasise a strong expectation that development will deliver environmental gains and these should specifically include biodiversity gains. This will provide policy support for the text in 1.17. Sub-section viii currently aims to minimise loss of environmental capital. The aim should however be for no net loss of environmental assets as a minimum with a general presumption in favour of net environmental gain.
RE4	Supply of employment land	In general we support the redevelopment of existing sites to make better use of space. However, this should be integrated with effective transport plans to make use of sustainable transport options so reducing the amount of car parking space needed by employees. This may enable the redeployment of existing car parking space for other economic use incorporating biodiversity gain.

## TOURISM

TSR1	Coastal resorts	The effects on the marine environment should be assessed when addressing waste, pollution, recreational activities etc. Degradation of the marine environment will ultimately impact negatively on the economy of the coastal resorts.
TSR2	Rural tourism	It is important to encourage sustainable tourism. The policy should seek to protect the rural environment whilst encouraging diversification. At present the policy is development led. As the quality of the environment is the basic resource on which successful tourism is based, the policy should be environmentally led.
TSR3	Regionally significant sports facilities	Again the policy is development led, it should have far greater emphasis on sports and recreation that do not impact negatively on the environment. This should include safe cycleways, pedestrian routes and should not encourage developments that increase car use.
TSR4	Tourism attractions	The greatest attraction to tourists is the environment yet the policy dwells on built visitor facilities.

## HOUSING

The plan is being driven by desires for large amounts of housing. This seems to be based on an economic model requiring people to fill jobs and then jobs for the extra people – a treadmill based on continual physical growth in a region, which, the plan admits, has finite resources and space. This renders the delivery of the cross-cutting policies impossible. An alternative economic model could be based on the concept of increasing individual productivity, thus wealth creation continues but it does not need to be fuelled by immigration and house building.

Even with the current assumption of continual expansion, some of the statistics and trends are dubious. Trends are based on a range of statistics including unsatisfied backlog, demographic change, homelessness and immigration. There are, however, possible omissions. Backlog refers to people unable to buy a house because of financial and availability problems. Yet a major backlog issue must arise from the large number of people who would buy second homes if they became available. Building more homes is more likely to address demand for second homes rather than the needs of people currently under housed. Therefore the blunt instrument of building more homes will not deliver the social objectives in the plan. In effect the affordable housing agenda is being used as an excuse to build large number of homes, the majority of which will be bought by people demanding second homes. The SWT is not here to make social points, but this strategy will do little to satisfy the need to home those in need whilst absorbing large areas of countryside and causing biodiversity loss.

There are also no figures in the plan for over-occupancy, derelict properties and the number of second or third homes, all of which might deliver more homes if economic circumstances changed without the need to build any new houses.

The trend of fewer people per house also, in part, drives the apparent need for more homes. Yet extrapolating this trend can be dangerous. If this trend was extrapolated into the future, within 200 years and the graph would cross the x-axis, i.e. there will be 0 people per house no matter how many are built.

H1	District housing distribution and provision	Potential development sites should undergo ecological assessment before being allocated. After allocation, an ecological survey will focus on minimising damage, rather than protecting habitats and species.
H2	Delivering adequate levels of housing	Development should not exceed basic resource availability (e.g. water). Wider impacts should be assessed, such as aggregate extraction (marine and terrestrial), pollution, transport of materials etc. Development should primarily meet local needs, not the desire for second homes in coastal and rural areas.
H3	The location of housing	Redeveloping buildings from other uses should not mean more development is then needed for these previous uses.
H4	Affordable housing	The need for affordable housing should not be used to over-ride environmental protection of sites or the value of sites to people and wildlife.
H5	Housing density and design	Housing design should be sustainable in operation as well as construction. Housing should be affordable, both economically and environmentally.

## TRANSPORT

This section should not be so heavily led by transport. Transport is a means to an end, not an end in itself. The actual requirement here is access to needs – and transport is perhaps the least efficient way of achieving access to needs. Thus other methods should be addressed long before transport – such as integrated planning so demand for travel is lower, and the use of Information Technology so improving the ability to work remotely. The plan should include more emphasis on non-transport methods of delivering access.

Policies in this section may also be unduly led by untested assertions. In para 1.2 for example pockets of deprivation are linked to “poor connections”, presumably poor transport connections, so implying that poor transport is leading to deprivation. This is an assumption that is not always backed up by the evidence. The Standing Advisory Committee on Trunk Road Assessment (SACTRA), for example, have shown that weaker economies can actually be damaged by enhanced transport links as businesses move out to more attractive locations. The key here must be for stronger local economies, utilising local products, local people and local markets, and hence having a lower transport footprint.

There are, however, many good policies in this section. SWT supports the desire to achieve a re-balancing of the transport system in favour of non-car modes. This should mean new road building schemes are put on hold until all other measures have been implemented.

T3	The rural dimension	SWT supports increased access in rural areas through the improvement of sustainable transport methods. An integrated system is needed to include increased safety for pedestrians and cyclists.
T4	Regional hubs	SWT supports increasing the level of accessibility by public transport, walking and cycling as a priority.
T5	Regional spokes	Integrated regional system needed for door-to-door travel and to other regions.
T6	Airports	SWT objects fundamentally to airport growth based on predict and provide measures. Plans for airport growth completely undermine cross cutting policies such as CC2 and CC3 and run contrary to the requirements (nationally and internationally) on combating climate change. We do not agree that there is a need for more runway capacity, indeed policies should support a modal shift away from air travel and towards more sustainable methods of transport.
T7	Ports	Land travel to and from ports is a major issue, causing environmental damage and threatening to create demand for more damaging road schemes. Sustainable transport links at ports should be improved, with better rail links rather than a reliance on roads. Ports often occur in sensitive environmental locations so any proposed development of ports should receive stringent environmental tests and, as in other matters, the expectation should be for net environmental gain alongside port development.
T9	Public transport	General support for this policy.
T10a	Mobility management (new policy)	General support for this policy.
T10b	Mobility management	General support for this policy.
T11	The role of charging	Charging some users should be to the benefit of transport methods that offer alternatives to the car, e.g. using revenue from parking to increase public transport in urban areas. Spokes to rural areas must be strengthened if an integrated system is to be established -

		otherwise the emphasis may be on park and ride, which increases land take and car use and often isolates communities in the urban fringe from the countryside.
T12	Parking provision for new developments	The policy should seek to reduce parking space in existing developments as well as new developments. Car parking space is under-utilised land, often in valuable areas, the land yielded could be more efficiently used for social, economic and biodiversity gain.
T13	Travel plans and advice	These should extend beyond employees to visitors, students, patients etc - i.e. all users of all establishments.
T14	Rail freight	General support for this policy. It should be extended to smaller ports, such as Shoreham area, where lorries have to pass through residential areas and congestion black spots.
T15	Freight and site safeguarding	SWT generally supports this policy but would like to see more encouragement of locally produced/grown products to reduce transport impact, food miles etc.
T16	Inter-modal interchanges	All development sites around transport hubs should be ecologically assessed and should reduce road-based transport.

Tables 1 to 7 detail transport infrastructures either committed or planned. These tables do not sit well with the preceding policies. The tables outline policies that each scheme delivers. In practice, however, there is a great deal of conflict with policies in both the transport section and elsewhere. The table should therefore highlight conflicts with other policies, particularly with the cross cutting themes.

#### **SUSTAINABLE NATURAL RESOURCE MANAGEMENT**

NRM1	Sustainable water resources and river quality management	Water resources are already over-stretched. The South East has the smallest amount of headroom (the difference between water demand and the total amount of water available) in the country. The SE Plan and the subsequent LDDs will not be able to ensure that rates of development accord with the capacity to supply, treat and discharge water. Water is essential for a healthy functioning environment for people and wildlife and ecological information must be incorporated in any proposed measures to increase the amount of water available to the South East. Any level of development must be conditional on there being sufficient water available, furthermore the provision of water must be conditional on the environmental acceptability of resource exploitation. There are good elements in the plan regarding more efficient use of water (although it is suggested that water efficiency must be enforced in all developments, new and existing), however the underlying assumption seems to be that more investment in infrastructure will solve the problem. This is not the case. There is only a finite amount of water available. The plan should work within that constraint rather than deflect the issue with proposals for infrastructure development.
NRM2	Strategic water resources development	The plan is built on the presumption that some or all of the strategic water resource development options will go ahead. Indeed, figures for the amount of water that can be saved from water efficiency measures are over-optimistic (figures of 21% are used whereas the water industry believe that 8% is more realistic). Hence there is probably a greater need for resource development, for the given level of housing growth, even than is implied in the Plan, yet these proposals have not had a full environmental assessment. Environmental information must be at the core of any proposal. The assumption in the plan is that all the infrastructure developments are, in principle, environmentally acceptable, presumably all an environmental assessment will be expected to do is alter the details of the design. This is presumptive. It may well be that any or all of the infrastructure developments are environmentally unacceptable in principle, underlining the point that we

		may have to develop within the capacity of existing water resources. Whatever the case, it does not adhere to the principles of sustainable development to propose levels of development without having done the basic work to assess whether the necessary resources can be provided in an environmentally acceptable way.
NRM3	Sustainable flood risk management	Environmental management of flood plains must be a feature of flood defence. Space for naturally functioning floodplains must be made. This may include the creation or restoration of wetland habitats to alleviate flooding. This will provide socio-economic benefits, as well as achieving BAP targets.
NRM4	Conservation and improvement of biodiversity	SWT supports the pursuit of net gain for biodiversity across the region, but this needs to be reinforced throughout the policy. However the policy is weak because it seeks to minimise losses or damage. Conservation and improvement of biodiversity must not be confined to designated sites or protected species. A landscape approach must be taken if biodiversity is to cope with pressures from climate change, encroachment, damage, disturbance and pollution. Protecting water resources will be key to the region's biodiversity resource.
<p><b>NRM4 iv</b> is so important it either deserves expanding or to be re-drafted as a policy in its own right. This policy forms the fundamental response to issues such as global warming where the need is to build a functioning environment that is robust to external changes. We are committed to a certain level of environmental change due to global warming, and there may be other unpredictable changes with other causes in the 20 years of the plan. The natural world may be able to respond to this given the chance. This is vital not only to maintaining biodiversity but also to maintaining ecosystem services on which we all rely (water quality, flood defence, prevention of soil erosion, equitable climate etc). Biodiversity is an important element in maintaining a functioning environment, and is a key indicator of success but it is recommended that the objective of such a policy is wider than biodiversity. Perhaps a new policy should be drafted "Maintaining a healthy, functioning environment". Within this should be the concepts of large-scale habitat restoration, strategic areas for biodiversity improvement and the building of a well-linked ecological network throughout the region.</p>		
NRM5	Woodland	General support for this policy. Need to allow for habitat migration and genetic diversity to be maintained for long term survival of woodland species. This means that areas of woodland must be linked - i.e. landscape scale view must be taken at the same time as individual sites.
NRM6	Coastal zone management	General support for this policy.
NRM7	Air quality	SWT support the need to improve air quality, but the level of development proposed in this plan may compromise this.
NRM8	Noise	The policy only considers the effect noise has on people. Noise pollution is created by people and can also affect wildlife.
W1	Waste reduction	The SWT supports action to reduce the amount of waste being produced in the region, or imported from outside the region. Nevertheless, this policy is extremely weak bearing in mind the nature of the problems facing the South East. On the one hand the core strategy is to increase efficiency and reduce resource use yet on the other the plan only aims to reduce <u>the increase</u> in waste produced, thus there is a built in assumption of increasing inefficiency and resource use. The target should be for very significantly reduced waste production (not just a reduction in the growth of waste production).
W2	Waste reduction (planning)	
W3	Regional self-sufficiency	The need to dispose of waste from adjoining regions (e.g. London) should be balanced against quality of life in the SE region.
W4	Sub-regional self-sufficiency	

W5	Targets for recovery and diversion from landfill	Research into recovering energy from waste should be undertaken to ensure this is beneficial.
W6	Targets for recycling and composting	There is a need for incentives and enforced legislation to reach targets for recycling. This should be targeted at both domestic and business waste. This policy must be against a background of continually reducing waste production.
W7	Provision of waste management capacity	Sites must be located sensitively and not cause environmental damage.
W9	Markets for recycled materials	This is essential to drive the process. Materials must be useful or recycling will not be economically viable.
W13	Landfill	Site selection should be sensitive and minimise potential damage to the environment.
W14	Landfill restoration	Restoration measures should form part of the initial planning application and be undertaken throughout the operational phase of the site and beyond. There should be net gains for biodiversity.
W17	Location of facilities (criteria)	Site selection should be based on good environmental information and should include ecological survey work. Site selection should minimise environmental damage and seek biodiversity gains over the life of a site.
W18	Location of facilities (locations)	Facilities should be sensitively sited and avoid areas of ecological and/or landscape value. This policy may cause conflict with policies CC9 and NRM4.
EN1	Development design for energy efficiency and renewable energy	General support for this policy.
EN3	Regional renewable energy targets	General support for a significant increase in the production of energy from renewable sources. There should, however, be targets for a reduction in energy use both within the region and as a result of demands from activities within the region. Small changes to renewable energy sources alone are unlikely to have a major impact on either our global environmental footprint from energy use or our over-reliance on vulnerable external energy sources, without huge increases in efficiency and reductions of energy use.
EN4	Sub-regional targets	
M1	Sustainable construction	SWT supports action to ensure that recycled materials and sustainable construction methods are used in any future development. This should be a matter of national regulation as much as regional persuasion. Stabilisation of primary aggregate use by 2016 is too little too late. There are major environmental problems from aggregate exploitation both on land and from the sea bed, and at the same time the majority of waste going to land fill is waste building material.
M3	Recycling and	Facilities for recycling material should be sensitively sited and avoid areas of ecological

	re-use	and/or landscape value. This policy may cause conflict with policies CC9 and NRM4.
M4	Advocacy for recycling and re-use	This policy should be far stronger in order to drive the ability to reduce primary aggregate use, and reduce land fill, as set out in our comment under M1.
M5	Primary aggregates	This policy is presumptive. Strategic environmental assessment is needed in order to assess whether this level of extraction is indeed possible without unacceptable environmental consequences. This may be another case of an issue that can not be solved simply by more investment, there are absolute limits to the amount of material that can be provided. The more sustainable approach would be based much more on increased efficiency, reduced overall use of aggregates and an increase in the re-use of secondary aggregates.
<p>There is very little reference made to the extraction of marine aggregates. Marine sites also need careful consideration, particularly with respect to environmental damage and recovery of sites.</p> <p><b>A policy is needed to cover the after-use of mineral sites. There should be a strong requirement on mineral operators to restore mineral sites to good environmental condition.</b> There are great opportunities for environmental enhancement on old mineral sites and very great potential to deliver biodiversity objectives. Indeed the environmental quality of a site after extraction could well be higher than before hand.</p>		

<b>COUNTRYSIDE AND LANDSCAPE MANAGEMENT</b>		
<p>Other policies in the plan conflict with the following policies for countryside protection. Policies elsewhere will seek to override protection of designated sites and the wider countryside for socio-economic gain. There is insufficient space in the region to provide the level of development, infrastructure, energy generation and waste management being proposed without compromising the designated areas and open countryside. Areas surrounding designated sites are under increasing pressure for development and it is important that protected sites are not made into islands. These areas need to be connected to an ecologically functioning landscape to ensure habitat migration is possible and to maintain genetic health of species.</p>		
C1	The New Forest NP	The policy is specific to the New Forest, but it is likely that the South Downs will also soon be designated a National Park. There could therefore be an awkward situation where the South Downs may not be covered by a policy. It is not specifically covered by a National Park policy yet it will no longer be an AONB, so will not be covered by C2. Either an extra policy should be inserted, or C1 or C2 should be reworded to give “the highest priority” to protecting and conserving land within the South Downs as well as in the New Forest.
C2	AONBs	Policy on AONBs and National Parks would be improved by a more positive stance on delivering the purposes of designation and, specifically on enhancing the landscape and expanding environmental assets (including biodiversity).
C3	Landscape and countryside management	General support for this policy.
<b>MANAGEMENT OF THE BUILD AND HISTORIC ENVIRONMENT</b>		
<p><u>Acknowledging</u> environmental damage and mitigating for it is not the same as <u>preventing</u> environmental damage or protecting habitats and species. There should be net environmental gains in all development. This will benefit communities, especially in urban areas. It is vital that all sites are subject to ecological appraisal and the resulting information should be an integral part of any management decisions or improvement measures.</p>		
BE4	The role of small rural towns	Support public transport systems for these areas. Not all problems are solved through development. Small rural towns should fit into the rural setting and not compromise the local landscape or ecology.
BE5	Village management	Development is not always the solution. No development should result in degradation of the natural environment or an increase in traffic or pollution.
TC2	Regional network of town centres	This policy will not work without an effective, sustainable transport system, which operates at a regional level and beyond.
TC5	Retail	Promotion of large retail centres generally relies on an unsustainable transport infrastructure and the sale of products with a large transport footprint. The plan should encourage support for farmer’s markets and retail opportunities for local producers and businesses. These support local products, local economies, have a lower transport footprint and are more linked with the management of the local landscape.
S2	Supporting healthy communities	Support the links between mental and physical health and a healthy environment. Access to more wildlife-rich green space has been shown to have beneficial health effects on people.

S3	Promoting accessible health services	SW 1 supports the promotion of green travel plans and sustainable procurement in this policy.
S6	Education and skills	Support is needed for education providers working outside of state educational establishments to deliver the national curriculum in areas such as environmental education.
<b>SUSSEX COAST SUB-REGION</b>		
<p>The following policies are driven by economics with the environment being seen merely as a hindrance.</p> <p><b>Option A</b> 2,400 homes p.a. is considered achievable without the allocation of significantly more land for development than is in current plans. This option predicts a slowing down in delivery after 2011/2016 which will 'fetter chances for economic recovery'. The language used here implies an unsustainable approach to economic growth. The approach relies on economic growth fuelled by immigration rather than based on an increase in individual productivity. Will the population carry on growing at the same rate or is the Plan delivering more second homes and thus increasing disparity between rich and poor?</p> <p><b>Option B</b> 3,600 homes p.a. recognises the need for more land take in greenfield areas. Again there is no timescale on how long this level of demand will continue, but it does highlight the fact that the required level of employment is unachievable, so the problem of out-commuting will be exacerbated. It also recognises that the required amount of infrastructure that this level of development will require cannot be funded from the development and would be environmentally damaging.</p> <p><b>Option C</b> 3,000 homes p.a. delivered in conjunction with a more vigorous drive for economic development and regeneration. This would require land for 11,000 homes on top of the allocations in existing plans. This option recognises that this will involve some incursion into environmental constraints. SWT disagrees that this option offers 'the most sustainable combination of contributing to the needs of housing provision whilst enabling a step change in economic performance'. Economic gain should not be at the expense of the environment in a sustainable strategy - it is not a balancing act. Development should offer environmental, social and economic gain in order to be considered sustainable.</p>		
SCT1	Core sub-regional strategy	The economy of the Sussex Coast Sub-region is based on its environment. Visitors to the South Downs and the coastal areas support the local economy. Improving the environment will improve business, but damaging it will create a 'boom and bust' scenario.
SCT2	Enabling economic regeneration	Access to needs, services, market etc may need to be improved and this is what should be in the policy (STC2 ii and iii) rather than an emphasis on transport. The current policy again rests on the assumption that improved transport will enhance deprived areas when the evidence for this is weak. If transport is to be improved then it should be done without building more roads. Other systems, such as improved walking and cycling facilities, better public transport and improved remote working should come first.
SCT3	Management of existing employment sites and premises	All potential and existing development sites should be individually assessed, including an ecological assessment before put forward for development. Even if a site was allocated in the past, it does not mean it is still suitable. The dynamic nature of biodiversity means that the site could now be of greater value to wildlife heritage or for recreation etc.
SCT4	Employment priority in land allocations	<p>This policy clearly enables unsustainable development, which is in conflict with the overarching aim of the Plan. It reduces the value of all policies to protect and enhance the natural environment and does not allow for mitigation in other areas, such as land banking. Policy C2 covers land within an AONB, which is considered as important as a National Park designation and of value to landscape, wildlife and the local community. This designation affords environmental protection, which should override other needs.</p> <p>SCT4 ii is far too much of a blunt instrument. It is unclear what environmental constraints can be infringed, under what circumstances, there is no idea of the stringency of any test that must be applied and no clue is given as to the level of any environmental gain that may be required in compensation. This is a huge area for discussion and should not be</p>

		dismissed in one sub-section or a policy. If environmental constraints are to be infringed then it should be clear that this would be a very rare occurrence, effecting relatively minor constraints and that there will be a requirement for very significant environmental gain (much more ambitious than anything seen so far) through habitat restoration and re-creation. Furthermore any environmental compensation could be keyed in to delivering targets in areas of strategic opportunity for biodiversity (see comment under NRM4iv).
SCT5	Education and skills	NGOs can help with Continued Professional Development - particularly for Planners.
SCT6	Co-ordination, leadership and promotion	<ul style="list-style-type: none"> <li>i) The 'Hastings-Bexhill 5-Point Plan' does not give proper consideration to the environment when executed - e.g. the Bexhill-Hastings Link Road, which has been turned down twice because it is so environmentally damaging, yet is being enabled through this new approach. This proves that this overall strategy is not sustainable.</li> <li>ii) Again this appears to be an economically driven strategy to build on greenfield land.</li> <li>iii) There appears to be no consideration given to the environment through representation on A.I.F's, therefore this is not a sustainable approach.</li> <li>iv) Development of an airport in this location is unsustainable, as is the focus on the road network in this area.</li> </ul>
SCT7	Broad amount and distribution of housing	Environmental constraints on development are important as they represent the need for a functioning ecosystem, which is vital to life. Recent flooding problems, water shortages, water pollution and air quality should indicate that we need greater protection for the environment, especially in a densely populated region where the economy has been built on the environment.
SCT8	Infrastructure	
<p>The Sussex Coast sub region is immediately adjacent to, and may include parts of, the future South Downs National Park. The boundary of the sub-region should be drawn to exclude the proposed National Park and so ensure that a landscape unit with the highest level of protection is not effectively targeted for development, which may under SCT4 ii, result in "infringement of environmental constraints". Furthermore there should be far greater emphasis placed on the potential benefits (to economy and society) of being in a part of the region with such a high level of environmental wealth. Economic development should be more integrated with environmental protection and enhancement.</p>		
<b>GATWICK AREA SUB-REGION</b>		
<p>Object to perceived need for development levels that will encroach on areas currently subject to national designations. It is important for the wider environment to be considered, beyond designated sites. The policy purely about economic growth, therefore not sustainable.</p>		
GAT1	Scale, distribution and type of housing	As with the Sussex coast sub-region, the proposed level of development undermines the objectives in the cross-cutting policies
GAT4	Environment and character	The basic approach here is supported but there could be greater emphasis on the delivery of environmental gain alongside development. Crawley already has a good greenspace network built into its developed area and this should be enhanced and raised in importance to link in with a higher status approach to wider ecological networks (see comment under NRM4iv). This is perhaps especially important in the Gatwick because (notwithstanding comments under GAT1) this is an economically active area where development activity will be focussed. It therefore provides an opportunity to link the large economic wealth of the area with major environmental enhancements. Policy should promote the development of an environmental spatial vision for the area to drive the integration of development with environmental gain.