

# Sussex Wildlife Trust

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22<sup>nd</sup> June 2006

Dear Ms Morgan

## RE: The South East Plan

Thank you for the opportunity to comment on the South East Plan.

This representation is made on behalf of the Sussex Wildlife Trust. The Trust was formed in 1961 and with a membership of over 20,000, a turn-over of nearly £2 million per annum and a reserve holding covering about 3,500 acres, is one of the major conservation organisations in the County. We are an independent charity that works in partnership with other Wildlife Trusts within the Royal Society of Wildlife Trusts and also with a diverse group of partners from the statutory, voluntary and commercial sectors. We are an active member in both the South East Forum for Sustainability (SEFS) and the South East Biodiversity Forum (SEBF) and we support responses submitted by both these groups. In addition the Sussex Wildlife Trust has worked in partnership with the other Wildlife Trusts in South East England to prepare a separate response to this consultation.

Detailed responses to policies, supporting texts and sections are presented on the enclosed comments form. Below, however, are a few generic points that we wish to make about the Plan.

Our general concern is that, whilst some of the Cross-cutting policies are broadly welcomed (for example CC1, CC2, CC3 and CC12), these do not seem to drive the policy direction of the rest of the Plan. In practice they seem to be general principles that are quickly disregarded in the main body of the document where development levels are set and sub-regional strategies developed.

### *Sustainability of the plan*

The Sustainability Appraisal (SA) of the Plan identifies a broad range of areas where the plan as drafted fails to meet the aspirations of Government and the Regional Assembly for sustainable development. In broad summary the plan scores moderately well against sustainable development objectives relating to economic and, to some extent, social objectives but negatively against a range of environmental objectives (Section 3.4, Appraisal Findings, SA Non-Technical Summary). We agree with the conclusion of the SA that the plan is likely to diminish the quality of life of the residents of the South East through continuing declines in assets such as biodiversity. This is clearly an imbalance that should have been addressed. The scale of the mountain that needs to be climbed in

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order approach sustainability is severely understated. The ecological footprint of the region is estimated to be 29 times its physical area and this should have stressed the importance and urgency of CC1, 2, 3 and 12.

#### *Climate Change*

The importance of climate change as a challenge for both adaptive management and remedial measures has gained very high scientific and political prominence. Whilst the Plan has a policy relating to climate change the overall Plan has not been assessed against probable future scenarios. Given the fundamental nature of climate change, and the vulnerability of many of our existing and planned communities and infrastructure to such changes we believe that an iteration of the plan is required to address these issues. As with sustainability in general, the Plan fails to pick up the urgency or importance of climate change. The region will need to adapt to climate change, in terms of adapting to its effects, by planning a more robust, adaptable environment and in terms of planning advanced CO<sub>2</sub> neutral businesses and accommodation.

#### *Adaptability in relation to climate change*

The Plan is also extremely weak in relation to adaptive management for climate change. Whatever remedial measure are put in place today, the region is already committed to the considerable effects of climate change because of the level of past greenhouse gas emissions. There should therefore be far more in the plan regarding the development of an environment that is robust to climate change throughout the South East Region. Policy NRM4 is generally supported, and is a step in the right direction, but far more needs to be planned regarding the construction of a more ecologically viable region. This will involve the rebuilding of large viable ecosystems, inter-linking and de-fragmenting habitats through the concept of an ecological network, and low intensity land management systems that allow ecological processes to function across the landscape. This is required in order to deliver biodiversity objectives and ensure the continued provision of ecosystem services to people in the region.

#### *Appropriate Assessment under Habitats Directive*

The Plan has yet to be subject to Appropriate Assessment under the Habitats Directive and Habitats Regulations of 1994. The necessity of such a procedure has recently been confirmed through the European Court of Justice. Given the exacting nature of the planning tests required under this procedure, and given the numerous examples of close proximity of proposals in the plan with Natura 2000 sites, we believe that the authority determining the Regional Spatial Strategy needs to consider the potential implications of Appropriate Assessment. In common with the SEA an iteration of the Plan may be required. We would stress that some sub-regional strategies (for example that for the Sussex Coast) do not even note the presence of Natura 2000 sites let alone hint at the need for an Appropriate Assessment.

#### *Over-dependency on behavioural change*

Whilst huge amounts of resources and support are marshalled to support development, housing, transport infrastructure etc, which will hugely increase the ecological footprint of the region, the only real attempt to counterbalance this is with a vague bid for behavioural change. This dependency on behavioural change to deliver the key policies of the plan is alarming. There are very few mechanisms, even fewer resources and hence very little ability to deliver this behavioural change. In practice the delivery of key cross-cutting policies seems to be based on little more than hope.

### *Poor link between aspirations and policy framework*

Many of the cross-cutting policies are welcomed, but the rest of the policy framework is at variance with them. There is no clear link between the key policies and, for example, levels of development, housing numbers, sub-regional strategies etc. There is poor recognition of environmental pressures and little plan modification as a result. Levels of housing development will place considerable pressure on, for example, greenhouse gas emissions, water consumption, waste arisings, biodiversity, landscape and air quality. The issue is raised in the SA, yet there is little evidence of how this has influenced the scale, location and design of development.

### *Sub-regional strategies.*

The poor link between cross cutting policies and the rest of the policy framework is particularly evident in the sub-regional strategies. For the Sussex Coast, for example, the introduction reads as a tirade of complaint about the limits put on development through environmental constraints with the result that STC4 proposes to ignore environmental constraints. The principle of seeing the environment as an asset that is of benefit to, and gains benefit from, sustainable business is abandoned at that point.

### *Environmental Restoration and Enhancement.*

Climate change may be a key driver, but the concept of environmental enhancement (raised in CC12) needs far greater development in its own right. Delivery of biodiversity targets, promotion of large, viable ecosystems, inter-linking fragmented habitats through an ecological network and low intensity land uses so that ecological process can function across entire landscapes should be promoted in the Plan and required from subsequent documents (Local Development Documents for example).

### **To summarise:**

- The Plan has good cross cutting policies but these are not linked to the rest of the plan.
- Having raised sustainable development and climate change, the urgency and importance of these issues is still under-stated.
- There is an over-dependency on behavioural change to deliver objectives, with few resources or mechanisms to deliver this change.
- Sub-regional strategies omit environmental issues and focus on the environment as a constraint rather than taking advantage of it as an asset.
- Environmental enhancement needs further development, with requirements on Local Authorities and others to deliver.

Yours truly,

Dr A Whitbread  
Chief Executive