

# Sussex Wildlife Trust

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28 April 2009

Dear Sir/Madam

## Re: **Eco-towns Draft Planning Policy Statement**

The following response to the draft Planning Policy Statement on Eco-towns is made on behalf of Sussex Wildlife Trust. We are the leading conservation organisation in Sussex with over 30,000 members.

### **Q1 Does the draft Planning Policy Statement provide sufficient guidance on the consideration of eco-towns through the plan making process?**

Sussex Wildlife Trust believes that eco-town proposals remain outside the recognised planning process, as individual proposals are being progressed between developers and Government in advance of guidance being agreed and produced.

We have concerns about selection criteria but are most concerned about the Ford proposal. This site has been put forward in advance of national criteria, despite having been judged as an unsustainable location within the planning system.

There is confusion over developers' claims that Ford conforms to local and regional policies and others' understanding that it is in conflict with local plans and strategies. This is symptomatic of Eco-towns having been brought forward in advance of an agreed process.

This has resulted in resources being deployed in response to individual sites when selection criteria have yet to be agreed. We are particularly concerned that biodiversity is not informing the decision making process. We have not seen any ecological survey results for this area, which lies in the floodplain alongside a tidal river.

The Arun Draft Core Strategy offers alternative means of meeting housing needs through an urban extension built to eco-town standards - the Bognor Regis Eco-Quarter or through several urban extensions. Are these proposals being considered against the eco-town proposal? The local planning authority prefers the urban extension option. If this preferred option is selected

## *Taking Care of Sussex*

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there is potential to conflict with the Government's list of eco-towns. How will such a conflict be resolved?

**Q2            Are the locational principles for eco-towns sufficiently clear and workable?**

No, we are unclear as to how the sites being considered have been selected when selection criteria have yet to be agreed. Do the sites conform to agreed policies, as claimed by the developers, or indeed do they have to if the draft PPS eventually confirms the sites.

We are objecting to the Ford site on sustainability grounds, including negative impacts on biodiversity and ecosystem services. We do not consider this to be a sustainable option, yet are still not able to measure this against eco-town guidance.

Should the locational principles be appropriate, we will see the removal of sites such as Ford, which have been previously been dismissed for development on sustainability grounds not least because it lies within a floodplain?

We have serious concerns about future infrastructure associated with any proposal in the Ford area, particularly with regard to transport issues. We oppose the proposed A27 Arundel by-pass, which is not a sustainable option and will result in loss of BAP habitats and designated wildlife sites as well as further contributing to climate change and pollution.

**Q3            Taking overall the standards set out in the draft PPS do you think that they achieve a viable eco-towns concept?**

We do not believe the process is environmentally led as it should be, with ecological data and ecosystem functions currently omitted from the evidence base. The emphasis is on carbon emissions, yet does not include embodied energy or transport. This means that not only will an eco-town fail to be truly carbon neutral, but will also fail to ensure adaptability in response to climate change.

Whilst a zero-carbon development is a laudable objective, it is only one aspect of wider environmental sustainability. Biodiversity is an indicator of a healthy environment and a vital component of sustainability, yet appears to be a side issue rather than integral to standards. Eco-towns will not be sustainable if this development-led approach balanced against biodiversity loss and damage is adopted.

The standards should ensure development is designed around a matrix of contiguous, multi-functional greenspace, which is informed by the current ecological assets and delivers biodiversity, landscape, ecosystem function and social benefits.

**Q4 We would like your views on the Government's proposed standards for eco-towns, in particular:**

**Q4.1 Do you consider that the standards provide a clear basis on which to make decisions on planning applications for eco-towns?**

The standards concentrate on carbon emissions but do not consider embodied energy or transport emissions. This means that proposals measured against them will not necessarily represent true sustainability or zero carbon development.

The Ford proposal includes references to potential development of tidal power in the River Arun which could have serious negative ecological impacts.

The lack of emphasis on ecology and ecosystem function means that developments will be retro-fitted into the natural environment rather than informed by it. This means a continuance of the 'allocate then mitigate' system with respect to biodiversity.

The Ford proposal also aims to establish an energy from waste plant. Will the carbon emissions associated with this be accounted? This should not only include emission from incinerating waste but also transport if the site is to import waste.

**Q4.2 Do you consider that the cost of implementing the standards will undermine the viability of eco-towns?**

The environmental costs and therefore economic costs of unsustainable development are not acceptable in any development. The economic and social costs of climate change and inappropriately placed development are already being felt as a result of past mistakes and Government must not repeat this.

**Q4.3 Are there any standards that you feel are missing? (That are not covered in other Government policy or guidance.)**

The standards fail to place ecology at the heart of eco-towns, which is very disappointing in light of the fact that the Government's aim in the eco-towns prospectus is to create 'exemplars in environmental sustainability and integrate green space and features to enhance biodiversity'.

The value of ecosystem services has been assessed by Defra and should inform this process.

The BAP system offers national, regional and local targets to inform development.

**Q4.4 Are any of the standards not essential?**

The minimum of 5000 homes is another example of eco-towns not being environmentally led. The capacity of a site should be considered, using evidence which should include a detailed ecological assessment.

**Q4.5 The zero carbon standard attempts to ensure that carbon emissions related to the built environment in eco-towns are zero or below. Have we specified the calculation of net emissions clearly in a way that avoids perverse incentives and loopholes? Is this standard the most cost effective way to do this?**

We would like to see embodied energy assessed and included in the carbon rating as seen in the One Planet development in Brighton.

We are concerned that an estimated 50% of journeys being car based will constitute an increase in carbon emissions in the local area. If the Ford development increases the likelihood of the proposed Arundel by-pass, this will lead to even greater levels of car use in the wider area. This needs to be honestly assessed and included in carbon calculations if they are to be meaningful.

Assessments of total carbon emissions associated with incinerating waste to produce energy need to be clearly explained.

**Q4.6 The climate change adaptation standard, alongside existing planning guidance, aims to ensure that eco-towns will be more future-proof. Is it sufficiently clear and workable?**

The loss of greenfield and reduced connectivity between habitats across the wider countryside will reduce the ability of the environment to adapt to the effects of climate change, particularly in the case of species movement. It is important to remember that biodiversity is a key indicator of a healthy environment and needs to be assessed before locations for development are chosen.

The Ford proposal sits alongside the River Arun in a floodplain, which is essential to providing ecosystem services related to flood alleviation and water resources. The economic costs associated with replacing the services the natural environment provides need to be assessed and incorporated into proposals.

**Q4.7 Should the PPS be more prescriptive than set out in paragraph 4.9 (e) in relation to energy efficiency? Do you agree that 70% is an appropriate level of carbon mitigation through on-site means?**

The highest possible level achievable should be enforced if sustainable development is the objective. Eco-towns should be striving to set the highest standards achievable in development. The broader economic costs of unsustainable development should be considered.

We maintain that the standards set for eco-towns should be applied to all development in order to achieve sustainability. The housing levels proposed within eco-towns is only a small proportion of housing proposed nationally and if they are to represent exemplars, standards must be high and rigorously applied.

We do hope that the final PPS will ensure an environmentally led approach to eco-towns with ecology informing decisions. Biodiversity is a key indicator of a healthy environment and so should be integral for development to be sustainable.

Yours sincerely

Janyis Watson  
Head of Conservation