

The change in land use to accommodate new housing, industrial development and associated infrastructure poses a significant risk to wildlife and the wider environment of Sussex. The population of Sussex has increased from just over one million in 1961 to 1.6 million in 2011 (an average of 1% per annum);¹ the number of households has been predicted to rise by 18.8% during the two decades to 2021.²

The national legislation and policy framework requires development to be sustainable and sets out a range of tests to be applied through, for example, sustainability appraisal, strategic environmental assessment, environmental impact assessment and Habitats Regulations Assessment. These are broadly designed to ensure that the likely environmental effects of strategic planning and large development proposals are as well-understood as possible and that the most sensitive wildlife sites, important habitats and species are not detrimentally affected. The principles and practice as they relate to wildlife interests are set out in the British Standards Institute 'Biodiversity — Code of practice for planning and development' (BS 42020:2013) and in best practice guidance issued by professional institutions.³

Local planning authorities are also required to have a rolling programme in place to meet the predicted demand for additional homes and the replacement of old, substandard housing stock in their area.

The Sussex Wildlife Trust believes that the potential scale and distribution of development – and of new housing in particular – should be planned and delivered in a sustainable fashion, based on the dual driving elements of sustainable development as set out in 'Securing the Future'⁴ :

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

The guiding principles aim to improve the quality of life for all. As a minimum this means avoiding the erosion of our natural capital, including our biodiversity assets. Government's stated policy ambition is to move towards development resulting in a net gain to nature.⁵

Consequently, we take the view that the following considerations are essential in formulating housing and industrial development plans and policies at both strategic (local plan) and community (neighbourhood plan) levels and in the assessment of specific development proposals:

- Development plans or assessments of development proposals will be based on up to date biodiversity information, in line with planning and impact assessment guidance, and in particular BS 42020:2013 (and subsequent updates).
- Any strategic plan or specific development proposal will:
 - Include measures to enhance the coherence of the ecological network of the specific area or location and support the networks within the setting and adjacent areas;
 - Provide clear evidence of the net benefits to nature that they propose to deliver, including measures to maintain and/or enhance natural capital assets.

The Sussex Wildlife Trust will judge any strategic plans and specific development proposals against these considerations. We will, within the limits of our resources:

- engage positively with strategic planning and development management processes to ensure that housing and industrial development in Sussex is sustainable;
- prioritise activities to focus on:
 - specific development proposals likely to affect areas owned and/or managed by SWT;
 - strategic (local) development plans;
 - development plans or proposals of strategic interest to Sussex Wildlife Trust, including those affecting key species or influencing the coherence of ecological networks.

SWT will also:

- promote the need for housing and industrial developments to employ the highest possible construction standards to reduce impacts on the wider environment, including measures to minimise demands on water resources and reduce carbon emissions;
- collaborate with RSWT and others to achieve improved planning policy and development control standards.

¹ Office of National Statistics (2001) 200 years of the Census in Sussex (www.ons.gov.uk/ons/guide-method/census/1991-and-earlier-censuses/census-bicentenary/area-monitors/regions/sussex/sussex-area-monitor.pdf)

² Office for National Statistics (2013) Interim 2011 projections. Table 406: Household projections by district, England, 1991-2021

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/189965/AllTablesNonRegionalFinal_3.xls)

³ For example the series of Technical Guidance publications issued by the Chartered Institute of Ecology and Environmental Management (<http://www.cieem.net/technical-guidance-series-tgs->)

⁴ HM Government (2005) The UK Government Sustainable Development Strategy Cm 6467.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69412/pb10589-securing-the-future-050307.pdf

⁵ HM Government (2011) The natural choice: Securing the value of nature Cm 8082 (the 'natural environment white paper', NEWP); Department for Communities and Local Government (2012) National Planning Policy Framework.