



Sussex Wildlife Trust - 1192744

### Matter 3 – Climate Change and Water

**Matter 3, Issue 1 – Whether the approach to climate change and energy use, sustainable design and construction is justified, effective, consistent with national policy and positively prepared?**

Q1. Is Strategic Policy 6: Climate change sound?

a) Is this policy consistent with national policy, justified and effective particularly when read alongside Building Regulations?

Whilst the Sussex Wildlife Trust supports the policy in general, we do not believe it is currently consistent with national policy and the requirement to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for biodiversity (NPPF September 2023 paragraph 153).

We believe this can be addressed with an additional criterion under section 2 that reads:

**'Safeguards, enhances and restores connectivity and function of habitats to support biodiversity's ability to adapt to climate change'.**

This wording would be consistent with the requirements of paragraph 179 of the NPPF.

c) Is criterion 2 d) effective?

The Sussex Wildlife Trust believes that criterion 2d) is effective, in that there is clear evidence that the use of green walls/roofs, trees and other nature-based solutions are effective in moderating external temperatures. Additionally, paragraph 154 of the NPPF recommends the use of green infrastructure to 'avoid increased vulnerability to the range of impacts arising from climate change'. The National Planning Practice Guidance (Reference ID: 8-005-20190721) also acknowledges that green infrastructure is important for providing urban cooling. As green infrastructure is a core component of any development, we believe this criterion is deliverable.