



Rother District Council

Local Development Framework

# **Sustainability Appraisal of the North East Bexhill Supplementary Planning Document**

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**Addendum to the  
Sustainability  
Appraisal Report**

8<sup>th</sup> June 2009

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# 1 Introduction

- 1.1 The Sustainability Appraisal Report (documenting the Sustainability Appraisal (SA) and the Strategic Environmental Assessment (SEA)) and the North East Bexhill 'Masterplan' Draft Supplementary Planning Document (SPD) were published for consultation in June 2007.
- 1.2 Following the receipt of consultation comments a number of modifications were made to the SPD taking into consideration these comments and the recommendations of the SA Report. The overarching aim was to strengthen and improve the document.
- 1.3 The title of the SPD has also been amended to the North East Bexhill Supplementary Planning Document. This change has been reflected in this document.
- 1.4 It is important following any changes to a plan/programme that the supporting SA Report remains consistent with the plan. A review was undertaken of the changes made to the SPD to determine whether they are significant and if they would alter the findings of the SA Report dated June 2007. This report is therefore an addendum to the June 2007 report and provides an assessment and commentary in sustainability terms of these changes.
- 1.5 It is worth noting at this juncture that the delay in finalising the SPD in light of representations has been due to the need to undertake further viability work in order to be confident of the deliverability of the development and by delays in the determination of the planning application for the construction of the Bexhill/Hastings Link Road, upon which development essentially depends.
- 1.6 Now the Link Road has planning permission, subject to signing a planning obligation and the viability of the development is better understood, the SPD is put forward for adoption, with amendments to address a number of the representations received on the draft version and the findings of the Sustainability Appraisal.
- 1.7 This addendum should be read in conjunction with the Sustainability Appraisal of the North East Bexhill Masterplan Supplementary Planning Document.

## 2 Significant Changes to the SPD

2.1 The consultation comments covered a wide range of issues, many representations are specific to particular sites although some generic issues raised through consultation may be drawn out:

- The sustainability of the developments, including in terms of energy usage
- Traffic generation and particularly its impact on Pebsham
- Infrastructure provision, both in terms of supporting sustainable development and in terms of affordability
- The degree of flexibility over issues such as density, layout, land uses and form of buildings

2.2 Subsequent to the consultation responses and the findings of the SA changes have been made to the Development Principles in Chapter 5 of the SPD, the policy areas in Chapters 6 and 7 and to Chapter 8 Implementation and these are documented below.

### Chapter 5 Development Principles

#### Sustainability

2.3 The SPD will give emphasis to attaining the highest practicable level of overall energy efficiency in terms of layout of development, energy efficiency of buildings and the use of renewable energy. Attention is drawn to Policy NRM11 of the South East Plan which requires that larger developments '*secure, in advance of local targets being set, at least 10% of their energy from decentralised and renewable or low-carbon sources unless, having regard to the type of development involved and its design, this is not feasible or viable.*'

2.4 Housing should aim to achieve Code Level 4 of the Code for Sustainable Homes and realise the full potential for renewable energy generation. New sustainable energy principles are listed below:

- *The use of solar heat, daylight and natural ventilation should be optimised by some 90% of dwellings having a principal glazed elevation facing to within 25% of south;*
- *The potential for a centralised combined heat and power (CHP) facility run on gas or renewable biomass fuels should be specifically investigated as part of an overall assessment and report on sustainable energy measures proposed for the development;*
- *If a CHP facility is feasible, its siting should be provided for within an employment allocation;*

- *The potential for wind energy should be exploited provided that established standards concerning noise, shadow flicker and telecommunications interference can be met;*
- *If wind energy is feasible, its siting should be on the edge of the development areas;*
- *The use of modern methods of construction, including modular building systems will be encouraged, where it can be demonstrated that such systems are of sustainable high quality manufacture and are consistent with urban design objectives.*

## Employment

2.5 An additional principle has been added to the employment principles:

- *Commercial uses benefitting from passing trade may be accommodated on primary traffic route frontages, subject to siting and design considerations.*

## Chapter 6 - Land North of Pebsham (Policy Area BX2)

### Access Framework

2.6 Transport and design consultants have assessed that the road link between Pebsham and the new development will be beneficial overall, and that the potential for 'rat-running' should be addressed by road and junction designs, including the creation of squares that slow traffic down. Therefore the following changes are to be made to the 'Access Framework' sub-section of Chapter 6 of the SPD:

- *Access into the residential area from the High Street will be in the form of a loop road. A spur off it will connect to Wrestwood Road. Access to the residential development at the eastern end of the site, and to the Countryside Park, will be via a central street off the loop road.*
- *The other key linkage is that through the residential land accessible from the 'stub' opposite Seabourne Road and the loop road. This will enable connectivity to local services at least for buses, cyclists and pedestrians. Car access may be allowed, but this is subject to measures for ensuring low traffic speeds through street design being able to effectively deter rat-running.*

### High Street Area

2.7 The area for retail provision has been termed the 'retail core' and the specification and requirements have been slightly altered to include the provision of offices or flats over the retail units and to allow other commercial uses including offices, hotel, showroom and petrol filling

station as well as the frontages of business premises within the employment sites.

#### Residential Development

2.8 The overall provision of housing has been recalculated using a more accurate template of the area of land available for housing at the given densities and the figure has been revised from a total of 1,075 to a new total of 1,125. It is anticipated that housing as part of the mixed-use High Street frontages may provide for in the order of 40-50 further units.

2.9 An additional paragraph has been added to this sub-section:

*Development may abut existing bungalows in Alford Way in the south-east corner of the site. To protect their amenities, dwellings should be restricted in height and/or distance to their rear boundaries.*

#### Community facilities

2.10 In light of consultation responses from and discussions with the Local Education Authority, the location of the primary school has changed. The topography of the original site was considered unsuitable and the new location of the school is to a flatter site to the north east of the original site. This allocation is now inclusive of the community building. The new text in the SPD is as follows:

*The preferred site for the school is close to the junction of the loop road and the eastern street, on flatter ground extending up to the proposed playing fields. Worsham Lane will provide safe non-vehicular access.*

### Chapter 7 – Land North of Sidley (Policy Area BX3)

#### Movement Framework

2.11 Text will be amended to show proposed bus access, in accordance with 'Access' principles. New text is as follows:

*In addition, bus access serving the employment development will be promoted. Initially, this may be a circular route.*

### Chapter 8 - Implementation

2.12 This chapter is considerably elaborated upon to include a clearer 'implementation plan', drawing on advice recently received on viability issues. In particular it will:

- Recognise the uncertainties that remain on costs and values at this time
- Update the programmes for both development and the Link Road, as agreed with East Sussex County Council
- Set out a basis for early release
- In relation to the infrastructure requirements, also indicate the form and scale of expected contribution, as well as its relative sensitivity to variation (and the process for dealing with this situation)
- Indicate the respective roles of key agencies in achieving the development

### Development Timetable

2.13 The new timetable for the SPD is shown below:

Year	Link Road	North East Bexhill Development
2009	Application approved	
		SPD approved
	Public Inquiry	
2010		
	Government decision	Detailed master planning/preparation of planning application begins
	Construction work starts	
2011		Outline and phase one Reserved Matters application *
		Outline and phase one Reserved Matters permission granted*
2012		Construction starts*
	Link Road opens	
2013		First occupation*

\* see also provision for 'early release' in Section 8, which would facilitate limited occupation from 2011/12.

2.14 New text in this section also includes:

*In the light of most up-to-date economic and housing market forecasts, it is assumed that the residential development in the Policy BX2 area will take place over some 10 years.*

*The timing of the smaller area of housing in the Policy BX3 area to the west is assumed to take place around 2014 onwards. This is*

*dependent upon the potential for access (including to services) off Watermill Lane and/or progress with the employment development.*

#### Early Release

- 2.15 Circumstances under which a limited amount of development will be allowed in advance of the Link Road opening have been determined and these are documented below:
- (a) *The Link Road has received final approval from the Secretary of State*
  - (b) *It is demonstrated by a Transport Assessment that the development will not, taking into account any sustainable transport improvements and/or management measures proposed, have a material adverse impact on the road network*
  - (c) *There is sufficient capacity in the existing foul drainage system and that surface water drainage arrangements are compatible with those envisaged for the whole development*
  - (d) *Any such proposal demonstrates that it will integrate with the development of the overall area and proportionally contribute to the range of infrastructure identified in this SPD as necessary to its success as a sustainable urban extension*
  - (e) *In the context of (d) above, any scheme must illustrate how the immediately adjacent land could be developed.*

#### Delivery

- 2.16 New text for this section is as follows:

*The SPD has been subject to an overall viability appraisal, which demonstrates that the development and the provisions for associated infrastructure requirements, as set out in the SPD are deliverable.*

*In order to effectively “balance” legitimate expectations, the SPD proposes that infrastructure requirements over and above basic enabling infrastructure (such as roads, sewers, open spaces) are identified and apportioned on a ‘per dwelling’ basis.*

*A key issue affecting this apportionment – and the deliverability of development - is the range of contributions that it is required to make to fund necessary the infrastructure improvements.*



## Infrastructure Requirements

- 2.17 This section makes it clear that contributions to bus services will be required; and contributions to the Countryside Park may be land in lieu of financial contributions.

## Appendix 2 Development Contributions

- 2.18 A revised table of development contributions is located within Appendix 2 of the SPD and this outlines the scope of anticipated infrastructure requirements for the development areas, excluding enabling infrastructure.
- 2.19 The table is structured to provide an overall financial scale of contribution for each topic area and identifies the delivery body and timescale. The major contributions are identified as a primary and secondary school and the Link Road receiving between £2.5 and £5 million. The next biggest contributions between £1 and 2.5 million to youth services and off-site transport improvements.

### 3 Non-Significant Changes to SPD

3.1 Additional information has been added to various sections of the SPD. This is welcomed as it makes the document more robust, adds clarification and acknowledges a wider suite of potential issues that would need to be addressed. The purpose of this SA, however, is to identify and assess the significant effects of the SPD and as such these other amendments have not been deemed as significant in terms of SA and have not been assessed. They are listed below as a means of ensuring transparency in the SA process.

- The document is no longer to be called a 'Masterplan' but purely a Supplementary Planning Document in recognition that further masterplanning will be required.
- Although not a defined archaeological site, reference to the need for proper assessment of potential interest, and the need for consequent investigation, in line with Local Plan Policy GD1, will be highlighted in the adopted SPD.
- The section entitled Policy Background will have more references to background/evidence based studies and the South East Plan. Specific reference will be made to a 'Local Area Transport Strategy' that is currently in preparation.
- The commentary in section 4.8 of the Vision section will be given more prominence by being moved to section 4.2.
- Two of the headings in section 5 'Development Principles' will change:
  - 'Sustainable Use of Resources' will become 'Sustainable Energy' and will have a sub-section entitled 'Related Matters'
  - 'Access' will become 'Access and Movement'
- In section 5.86 the Access Principle will clarify the Highways Agency's advice that there should be no occupation in advance of the Link Road opening, but that if a 'transport assessment' demonstrates that a part of the site may be occupied in advance of opening without a material adverse effect, then the Council would accept this but only when the final decision on the Link Road is made. This approach provides some flexibility for early development, but also recognises that the layout of any component area is dependent upon that of the whole which cannot be certain until final Link Road approval. In essence this has always been the presumption the adopted SPD is just ensuring clarification on this point.

- The 'Play and Open Space' section beginning at 5.70 will make reference to the Council's 'Play Policy and Strategy'.
- In Chapter 6 Land North of Pebsham, the sub-heading 'Movement Framework' will become 'Access Framework' to distinguish it from the sub-heading 'Movement and Green Space'.
- Chapter 7 Land North of Sidley will have textual reference to the possible future extension of the 'Country Avenue' westwards in association with longer term development, and the need to take account of this.
- In Chapter 8 the development timetable has been updated to reflect the new timetable for the Link Road application, construction and opening and also details the timeline for more detailed masterplanning.
- In Chapter 8 Implementation the sub-heading 'Phasing' has been replaced by 'Early Release'
- In Chapter 8 sub-section 'Planning Applications' has been subsumed into a sub-section called 'Key Roles in Delivery'. This section explains the key roles of all the agencies, bodies and developers in delivering this development outlined in this SPD.

## 4 Assessment of Significant Changes

### Amendments to Chapter 5 Development Principles – Sustainable Energy

- 4.1 The sustainable energy principles have been strengthened by the addition of a number of prescriptive elements to guide how the development will conform to being an exemplar of sustainable design.
- 4.2 These elements include maximising passive solar gain and natural ventilation, exploiting the potential for wind energy and modern methods of construction that will help to reduce greenhouse gas emissions – thereby helping to address the causes of climate change.
- 4.3 The possibility of a centralised combined heat and power facility to run on renewable fuel is also made key. Operating a cogeneration plant at point of use to generate primary energy improves energy efficiency and reduces the quantity of greenhouse gas emissions, in particular carbon Dioxide CO<sub>2</sub>.
- 4.4 The improvements to this section of the SPD should therefore be beneficial for the SA Objectives concerned with sustainable construction and addressing the causes of climate change through the reduction of greenhouse gas emissions.

### Amendments to Chapter 5 Development Principles – Employment

- 4.5 The additional employment principle states that commercial uses benefitting from passing trade may be accommodated on primary traffic routes and this should contribute to SA Objectives to sustain economic growth and competitiveness and to stimulate economic revival in priority regeneration areas. It will do so by improving the prominence of certain businesses which should help to increase trade, associated trade and competition.
- 4.6 This amendment should also meet the objective of the SPD to contribute to the economic needs of the town.

### Amendments to Chapter 6 Land North of Pebsham

- 4.7 Changes to the design of the road leading into the residential area have been made in order to reduce the possibilities of it being used as a short cut from the Link Road into the Pebsham area of Bexhill. The need to eliminate the possibility of ‘rat-running’ will be important for residential amenity, as well as to avoid congestion and poor air quality.

- 4.8 These changes in design therefore contribute to improving the performance of the SPD in SA terms and in particular the SA Objectives to reducing congestion and pollution levels, sustaining vibrant communities and addressing the well-being of the population including through reducing traffic noise and nuisance.
- 4.9 The amendment to the retail core to require retail units to have offices or flats over will help to encourage a vibrant urban community as well as contribute to sustaining economic growth, both SA Objectives.
- 4.10 The revision in the overall number of dwellings proposed in this area has increased the proposed housing figure by 50-100 (including allowance for accommodation as part of the High Street mixed use area). This increase will result in greater beneficial effects for the SA Objective to ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home. This revision also contributes to better meeting the SPD Objective of contributing to meeting the social needs of the town's existing and future residents.
- 4.11 The restriction in height and distance to the bungalows in Alford Way will help to protect the amenity of these dwellings and their residents' well-being.
- 4.12 The new proposed location of the school and community building is a more suitable site topographically as it is flatter and can therefore accommodate on-site playing fields. It could also be considered to be a preferable site by its more rural location away from the busy high street on the edge of the Countryside Park. Vehicular, cycle and pedestrian access are all maintained. Therefore overall this site is considered more suitable from a community perspective and from the SA perspective of creating sustainable vibrant communities and improving the well-being of the population.

#### Amendments to Chapter 7 land North of Sidley

- 4.13 The amendment to this chapter concerns the additional consideration of a bus route serving the employment development. This is an important addition and from the SA Objective point of view there will be greater beneficial effects for the Objective to improve travel choice and reduce the need to travel by car.

#### Amendments to Chapter 8 Implementation

- 4.14 The circumstances under which early release of land for development will be allowed has been clarified and specific requirements set out. These include a Transport Assessment which demonstrates sustainable transport improvements and no adverse impacts on the road network; compatibility of foul and surface water drainage

arrangements with that envisaged for the whole development; and proportional contribution to infrastructure.

- 4.15 These restrictions should ensure greater consideration is given to sustainable water management and therefore have greater beneficial effects for this SA Objective. This aspect could also help to mitigate the potential adverse effect identified by the SA (June 2007) of increased surface water run-off.
- 4.16 Further beneficial effects should be expected for the SA Objective to reduce road congestion, improve travel choice and reduce the need to travel by car. This is because it is expected that a Transport Assessment would ensure walking, cycling and public transport routes were available to service the development.
- 4.17 The deliverability of development is addressed and the need to balance legitimate expectations is expressed. Contributions over and above the requirements for basic enabling infrastructure will be made on a per dwelling basis. This approach advocates a fair and reasonable position in the current economic climate and in light of the pressing housing need and housing requirements of the South East Plan. This approach will enhance the sustainable benefits associated with the provision of high quality, affordable housing.
- 4.18 Infrastructure requirements now include a clear statement that contributions to bus services will be required. This priority to sustainable transport is important for improving sustainable travel choice, reducing road congestion and reducing the need to travel by car.
- 4.19 The infrastructure section also allows contributions to the Countryside Park to be of land in lieu of financial contributions. This is important as land managed as countryside is important and valuable in sustainability terms and such contributions help to improve the 'green credentials' and environmental benefits of the development.
- 4.20 In terms of the development contributions table now located in Appendix 2, the identification of the relative importance of contributions to various facilities makes clear the proposed overall level of investment for each item. The major contributions to schools should have a beneficial impact on the SA Objective to raise education achievement levels as well as creating vibrant communities. Youth services are allocated a major funding stream, albeit with a lower sensitivity, and this will have a beneficial impact on several SA Objectives including education, social exclusion, health and well being, vibrant communities, reducing crime and the fear of crime and access to facilities.

## 5 Conclusion

- 5.1 The revisions to the SPD have addressed many of the issues raised in both the consultation exercise and the SA Report. As such the SPD is now a more comprehensive, holistic and sustainable document. Specific improvements relate to:
- Greatly enhanced sustainability requirements relating to sustainable construction, energy efficiency and renewable energy
  - Improved provisions for commercial enterprise
  - Increased emphasis on sustainable transport, reducing congestion and improving travel choice
  - Increased provision for housing through increased efficiency in land use and area design
  - Improved location for education facilities ensuring adequate facilities for playing fields and outdoor space
  - Greater consideration to residential amenity
  - Improved understanding of development viability and more focus on deliverability and realistic contributions requirements
  - Improved development contributions framework outlining funding priorities, timescales and delivery bodies
- 5.2 It is important that the monitoring requirements are now taken forward to both verify the results of the SA and to identify any unforeseen adverse impacts, in order that they may be mitigated.
- 5.3 On adoption of the SPD, a Post-Adoption Statement will need to be prepared detailing how the SA process and consultation feedback have influenced the development of the adopted SPD.