

Rother District Council

Local Development Framework

Sustainability Appraisal of the North East Bexhill 'Masterplan' Supplementary Planning Document



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North East Bexhill Supplementary Planning Document Non Technical Summary of the Sustainability Appraisal

- 1. The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of planning policy documents. The preparation of the SA of the North East Bexhill Supplementary Planning Document (SPD), which aims to elaborate on policies BX2 and BX3, of the adopted Local Plan, has involved two key stages, namely:
 - The earlier production of a Scoping Report setting out what the scope of the Sustainability Appraisal would be
 - The production of the Sustainability Appraisal Report, which is being issued with this Non-technical Summary

Scoping Report

- 2. The Scoping Report incorporated:
 - a) a list of sustainability indicators against which the future impacts of the SPD can be measured;
 - b) a list of documents relevant to the SPD; and
 - c) a set of sustainability objectives to provide a framework to test the sustainability effects of the SPD.
- 3. The sustainability objectives for the framework were taken, and adapted, from the Integrated Regional Framework (IRF) which comprises of a regional set of objectives to help secure sustainable development, and cover a wide variety of environmental social and economic issues such as flooding, biodiversity, climate change, energy efficiency, waste generation, affordable housing and economic growth.
- 4. The Scoping Report was issued for consultation with the Strategic Environmental Bodies the Environment Agency, Natural England and English Heritage in January 2007.
- 5. The Environment Agency responded suggesting additions to the sustainability indicators and additions to the list of other plans and programmes relevant to the SPD. These additions have been incorporated into the scope of the study.

Sustainability Appraisal Report

- 6. The first task of the Sustainability Appraisal Report consists of testing the draft SPD objectives against the sustainability framework objectives. There was a general compatibility, but two areas of apparent conflict.
- 7. One relates to the SPD objective of protecting and enhancing the environment in relation to Sustainability Objective 1 (SO1) of providing homes. In consideration, it is noted that the SPD as a whole will substantially advance achievement of SO1 and, while there may be a tension between the

considerations, it is still important for the SPD to maintain the objective of developing in a way that fully respects environmental considerations. Therefore, this tension is acceptable.

- 8. Secondly, the SPD objective of meeting the economic and social needs of the town appears incompatible with the Sustainability Objective 7 of creating and sustaining vibrant rural communities. This is because it would take development and resources away from rural areas. However, in the context of a Local Plan allocation, the distribution of development has already been determined. In practice, the scale of development here would more likely overwhelm rather than strengthen rural communities. Hence, there is no real conflict for this SPD.
- 9. The compatibility of the SPD objectives themselves is also assessed. This is important to develop a clear vision. They are found to be compatible, with the exceptions of Objective A versus Objective D, and Objective C versus Objective E.
- 10. Objectives A and D present a similar dilemma as discussed at paragraph 7 above insofar as new development can be seen as inconsistent with environmental protection. This is a recognised tension but should be viewed positively.
- 11. However, there is regarded as a difference in approach implicit in objectives C and E, the former seeking to integrate development with adjacent built-up areas and the latter proposing a more contained "new community". It is considered that the respective merits of these approaches should be developed and further tested.
- 12. The second task requires developing the options to deliver the SPD objectives. In view of the above, the option themes developed for assessment relate to:

Option A – Provide for new development by the creation of a new community Option B – Provide for new development via an extension to existing urban areas

- 13. The third and fourth tasks require that these options be tested against 26 sustainability objectives and the effects be predicted and evaluated.
- 14. The outcome of this assessment was that both options for the form of development would contribute substantially to the objectives. Option B is seen as having somewhat more potential to provide greater sustainability benefits. This is attributable to the characteristic of integration, meaning that benefits of jobs and services are spread over, and supported by, a wider area.
- 15. At the same time, there are positive sustainability impacts of having a strong identity, although not necessarily defined through a "new community". Therefore, it is recommended that SPD Objective 5 be amended to delete the reference to a new community, but that developing a sense of place be retained and strengthened, and related back to the other objectives.

- 16. The most significant sustainability impacts of development of both options relate to the potential impact on important landscape characteristics and habitats, of additional traffic generation, water and energy usage.
- 17. The same mitigation measures would apply to both options.
- 18. The efficient use of resources water and energy, as well as waste, is perhaps most notable, as it impacts on several Sustainability Objectives. It is considered that there is clearly scope for the development to address these issues in its guiding objectives.
- 19. It is recommended that Objective 5 is modified to emphasise creating a highly sustainable character.
- 20. Also, this should be carried forward in the attention given to developing effective "resources strategies" with clear approaches to water conservation, habitat protection and enhancement, sustainable transport solutions, an energy generation strategy utilising renewable energies, and for sustainable design, construction and waste minimisation.
- 21. The North East Bexhill SPD will be monitored through the District Council's Annual Monitoring Report. This will ensure that the SPD document is working effectively to help meet the development needs in the District in line with the sustainability principles as well as the Local Plan.

1. Introduction

Purpose of the North East Bexhill Supplementary Planning Document

- 1.1 The North East Bexhill SPD will elaborate on Policies BX2 and BX3 in the adopted Rother District Local Plan. The role of the document will be to develop more detailed guidance on the form and nature of development. It is also seen as crucial to help secure the delivery of development and the requisite infrastructure.
- 1.2 The Local Plan policies BX2 and BX3 have been prepared relatively recently in accordance with current Government Guidance. Furthermore, they have been subject to sustainability appraisal through the local plan preparation process. The focus of the SA process will therefore be to assess the sustainability implications of the SPD content, not the policies themselves.

Purpose of the Sustainability Appraisal Report

- 1.3 The purpose of this second stage of the Sustainability Appraisal (SA), is to ensure that sustainability concerns and issues are integrated into the production of the SPD. At the scoping stage, the purpose of the SA was defined as follows:
 - to ensure the sustainability of policies and plans;
 - for it to be used to check the social, economic and environmental effects of policies and plans against wider sustainability objectives; to understand these; and
 - to effect a more sustainable policy or plan, ensuring against potential negative effects wherever possible.
- 1.4 The SA Report will examine the potential social, environmental and economic impacts of the North East Bexhill SPD. Where necessary, the SA will ensure that consideration is given to revising the approach of the SPD, or applying measures to mitigate potential detrimental impacts where necessary.
- 1.5 The approach to carrying out the production stage of the SA requires undertaking the following tasks, as identified in the relevant guidance:
- B1: Testing the SPD objectives against the SA framework
- B2: Developing the SPD options
- B3: Predicting the effects of the draft SPD
- B4: Evaluating the effects of the draft SPD
- B5: Considering ways of mitigating adverse effects and maximising beneficial effects
- B6: Proposing measures to monitor the significant effects of implementing the SPD

Compliance with SA guidance and SEA Directive 2001/42/EC

- 1.6 The requirements to undertake a Sustainability Appraisal and SEA are distinct. However the Government's approach has been to satisfy both requirements through a single appraisal process.
- 1.7 The Sustainability Appraisal (SA) on the Council's emerging supplementary planning document (SPD) on the North East Bexhill Masterplan, was undertaken in accordance with the then Office of the Deputy Prime Minister (ODPM) guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks November 2005', and is the second stage in the Sustainability Appraisal process. (The ODPM has since been renamed the Department Communities and Local Government).
- 1.8 Under the requirements of the Strategic Environment Assessment Directive, specific types of plan must be subject to a Strategic Environment Assessment (SEA). This involves the systematic identification and evaluation of environmental consequences of implementing plans and policies.
- 1.9 The SEA directive 2001/42/EC states that its objective is "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development".
- 1.10 SEA is focused primarily on environmental effects, while Sustainability Appraisal considers all sustainability-related effects social, environmental and economic.
- 1.11 By undertaking an SA of the North East Bexhill Masterplan SPD, the District Council has complied with the SEA Directive (2001/42/EC). The ODPM publication 'A Practical Guide to the Strategic Environmental Assessment Directive' sets out the procedure that is required to be followed in order to comply with the Directive, and is reproduced at appendix 1. This appendix also indicates the way in which this SA fulfils the requirements of the SEA Directive.

The Scoping Process

- 1.12 The first stage of the Sustainability Appraisal required the production of a Scoping Report, which was published for consultation in January 2007. The report concluded that there were no significant conflicts between the objectives of the SPD and the SA objectives.
- 1.13 The purpose of the Scoping Report was to:
 - Identify environmental, social and economic objectives contained in other relevant plans and programmes relevant to North East Bexhill SPD
 - Provide baseline information on environmental, social and economic characteristics of the District
 - Consider key sustainability issues facing the District on the basis of the Baseline collected

- Set out an appropriate framework for the SA including SA objectives, sub-objectives and indicators
- 1.14 The Scoping Report constitutes Stage A of the Sustainability Appraisal and is divided into a number of tasks as further detailed below:

Task A1: identifying other relevant policies, plans and programmes, and sustainable development objectives relevant to North East Bexhill SPD

- 1.15 Other relevant policies, plans, programmes and sustainability objectives that influence and are relevant to the North East Bexhill Masterplan SA and SPD have been reviewed and were included in the Scoping Report. They inform the development of the SA and SPD by:
 - Identifying any external social, environmental or economic objectives that should be taken into account in the SA;
 - Identifying other external factors, including sustainability issues, that might influence the preparation of the SPD; and
 - determining whether other policies, plans and programmes might give rise to cumulative effects when combined with the plan that is subject to the SA
- 1.16 The relationship of the SPD with other relevant plans, programmes and environmental objectives is detailed at Appendix 2.
- 1.17 The list has been amended since the scoping stage to include alterations suggested by the consultees.

Task A2: Collecting baseline information

- 1.18 The baseline information collated for the Sustainability Appraisal is listed at Appendix 3. The information has been obtained from a range of sources, although East Sussex County Council's website 'East Sussex in Figures' has provided a wealth of information for many of the indicators listed. These will provide the basis for predicting and monitoring effects, and to help identify sustainability problems and alternative ways of dealing with them.
- 1.19 The range of data is required to be holistic, covering social, economic and environmental factors. The relationship of local data to district and national data is shown where this is available. Also, a commentary as to the direction of the trend is provided where this is possible, which will identify any sustainability issues that either exist or are emerging.
- 1.20 The local data that has been collected has generally been confined to the three wards that abut the allocated sites, namely Old Town, St Michaels and Sidley wards, although some of the local data has only been available at Parish level.
- 1.21 Additionally, some indicators have been identified as useful for the Sustainability Appraisal process; however they are in the process of investigation and collection.
- 1.22 As the list of data shows, many of the issues identified through the baseline data are primarily social and economic. This may be in part due to the availability of such data, whereas environmental data has been more difficult to obtain.

- 1.23 There are, however, statutory designations which would identify and protect areas such as land of particular landscape and ecological value, as well as generic policies in the Local Plan that will provide environmental protection.
- 1.24 The baseline data will be reviewed as part of the overall monitoring process for the SPD itself and the other constituent elements of the Council's Local Development Framework as they emerge.
- 1.25 The baseline evidence provided in the appendices has been amplified from that submitted at the scoping stage.

Task A3: Identifying sustainability issues and problems

- 1.26 This task of the Scoping Report identified the key sustainability issues affecting the SPD, including environmental problems, as required by the Strategic Environmental assessment. Particular sustainability issues are:
 - a) Minimisation of waste in construction
 - b) Maintaining the key elements of landscape structure
 - c) Considering the impact on flood risk, including in the Combe Haven SSSI
 - d) Protecting habitats and promoting biodiversity, including in the SSSI
 - e) Securing energy and water efficiency in layout and design
 - f) Promoting healthy lifestyles, including through minimising car dependency
 - g) Increasing access to affordable housing
 - h) Supporting economic regeneration
 - i) Securing rewarding employment, accessible from deprived wards

Task A4: Developing the SA Framework

- 1.27 This task is essential to the SA process, as the framework comprises of a list of social, economic and environmental objectives which provide a way of checking whether the SPD objectives are the most sustainable, and can be seen as a methodological yardstick against which the effects of the SPD can be tested.
- 1.28 The Integrated Regional Framework produced by SEERA has been used as the basis of the SA Framework of the SPD, with slight adjustments to take into consideration the District's rural perspective and to take account of consultation responses to the LDF Core Strategy Scoping Report.

Task A5: Consultation on the scope of the SA

1.29 The SA Scoping Report was sent to the three Strategic Environmental Bodies, the Environment Agency, Natural England and English Heritage, for formal consultation purposes as required by the Strategic Environmental Assessment regulations. The five week consultation period ran from 31st January 2007 to 7th March 2007. A summary of the comments received during the consultation process is set out in Appendix 4.

2. Sustainability Task B1: Testing the SPD objectives against the Sustainability Framework

- 2.1 The first task of this production stage of the SPD is to test the SPD objectives against the Sustainability Appraisal framework objectives.
- 2.2 The SPD objectives set out what is aiming to be achieved for North East Bexhill in spatial planning terms. They were identified at the scoping report of the SA appraisal, and consulted upon at this stage. All the objectives have been identified as a result of working with the community and various stakeholders, including the Local Strategic Partnership and the North East Bexhill Development Group.
- 2.3 Testing the SPD objectives against the SA framework objectives highlights where SPD objectives do not accord with sustainability principles, and is produced in the form of a matrix at Appendix 5.
- 2.4 The objectives of the North East Bexhill SPD, first cited in the scoping report are that development:
 - A. Provides a high quality sustainable extension to Bexhill, which enhances the attractiveness of the town as a place to live, work and invest
 - B. Contributes to meeting the economic and social needs of the town and its existing and future residents
 - *C.* Is physically, economically and socially integrated with the town and its wider environment
 - D. Protects and enhances the environment
 - E. Has a clear character and sense of place' consistent with a new community
- 2.5 The Sustainability Framework was devised at the scoping stage of the SA process in accordance with the ODPM guidance. The framework consists of 26 sustainability objectives for the District. The objectives have been taken from the Integrated Regional Framework (IRF) with some adaptations to take account of the comments made by the Environment Agency in respect of the Council's Scoping Report for the Core Strategy, and in view of the Council's rural character. The objectives which constitute the framework are listed below:

2.6 The Sustainability Framework consists of the following objectives:

- 1. Does it ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home?
- 2. Does it reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment?
- 3. Does it improve the health and well-being of the population and reduce inequalities in health?
- 4. Does it reduce poverty and social exclusion?
- 5. Does it raise educational achievement levels and develop the opportunities to everyone to acquire the skills needed to find and remain in work?
- 6. Does it reduce crime and the fear of crime?
- 7. Does it create and sustain vibrant rural communities
- 8. Does it create and sustain vibrant urban communities?
- 9. Does it improve accessibility to all services and facilities?
- 10. Does it encourage increased engagement in cultural activity across all sections of the community?
- 11. Does it improve efficiency in land use through the re-use of previously developed land and buildings, including re-use of materials from buildings, and encourage urban renaissance?
- 12. Does it reduce air pollution and ensure air quality continues to improve?
- 13. Does it address the causes of climate change through reducing emissions of greenhouse gases?
- 14. Does it conserve and enhance the biodiversity of Rother?
- 15. Does it protect, enhance and make accessible for enjoyment, the countryside and historic environment?
- 16. Does it reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/lorry?
- 17. Does it reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products?
- 18. Does it reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products?
- 19. Does it reduce waste generation and disposal, and achieve the sustainable management of waste?
- 20. Does it maintain and improve the water quality of the rivers and coast, and achieve sustainable water resources management?
- 21. Does it ensure high and stable levels of employment?
- 22. Does it sustain economic growth and competitiveness?
- 23. Does it stimulate economic revival in priority regeneration areas?
- 24. Does it develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities?
- 25. Does it encourage the development of a buoyant, sustainable tourism sector?
- 26. Does it develop and maintain a skilled workforce to support long-term competitiveness of Rother?

2.7 As can be seen by the matrix at Appendix 5, each of the five SPD objectives when compared against the SA framework has in the main a majority of positive compatible likely effects. The following commentary highlights the SPD objectives which are likely to create a possible conflict with the SA objectives:

SPD objective D versus SA objective 1

- 2.8 Such a potential conflict has already been raised earlier in this chapter whereby there will inevitably be a cost to the environment with the expansion of Bexhill onto greenfield sites. However, the overall sustainability of meeting the development needs for the District with the creation of an urban extension at North East Bexhill has been established through the local plan process where such an approach has been considered to be a more sustainable option, rather than accommodating development in and around the District's villages, many of which are designated in the High Weald AONB.
- 2.9 Notwithstanding the impact on the environment, there will be opportunities for enhancement and mitigation by retaining principal landscape features such as small woods and hedgerows and supporting bio-diversity with the creation and retention of wildlife refuges or corridors and increasing habitats for aquatic bio-diversity with improved freshwater management.

Recommendation: Maintain the focus of development whilst taking forward opportunities for environmental enhancement when assessing the appropriate form of development.

SPD objective B verses SA objective 7 versus

2.10 By concentrating development at North East Bexhill, less development will be required to be distributed to the District's rural communities. This will impact on rural communities by the reduction in the creation of opportunities to secure affordable housing and developer contributions to provide or improve community services and facilities. In addition, by constraining growth to rural communities existing services and facilities may be jeopardised through lack of support.

Recommendation: Whilst the provision of new development of the scale required would increase the range of services, this approach to development in the rural areas wouldn't be consistent with other objectives such as maintaining the existing settlement pattern and maintaining and enhancing the relationship between individual settlements and their landscape setting. The local plan process tested the sustainability of the Council's approach to the distribution of development and found that concentrating development at North East Bexhill to be overall the most sustainable. In addition, development will still take place in the rural areas of a scale in keeping with the existing settlements.

2.11 In addition to testing the sustainability objectives of the SPD with the Sustainability framework, it is also considered to be useful to test the sustainability objectives with one another to reveal the internal compatibility of the SPD objectives.

2.12 This has also been carried out in the form of a matrix and is reproduced below:

Testing Compatibility of SPD Objectives

SPD Objective]			
Objective A				
Provides a high quality				
sustainable extension				
to Bexhill, which				
enhances the				
attractiveness of the				
town as a place to live,				
work and invest		_		
Objective B				
Contributes to meeting				
the economic and	\checkmark			
social needs of the	v			
town and its existing				
and future residents				
Objective C				
Is physically,				
economically and	\checkmark	\checkmark		
socially integrated with	v	v		
the town and its wider				
environment				
Objective D				
Protects and enhances	Х	0	0	
the environment				
Objective E				
Has a clear character				
and sense of place	\checkmark	0	Х	0
consistent with a "new				
community"				
	SPD Objective A	SPD Objective B	SPD Objective C	SPD Objective D

- 2.13 As can be seen the majority of the associations are compatible or neutral, with two exceptions. Objective A (the principal objective to provide a sustainable extension to Bexhill) shows incompatibility with objective D (which seeks to protect and enhance the environment), and objective C (which seeks physical and economic integration) shows incompatibility with objective E (which seeks a clear character and sense of place consistent with a new community).
- 2.14 In respect of the incompatibility of objectives A and D, the provision of development at North East Bexhill at the scale provided for by policies BX2 and BX3 has already been tested by the Local Plan process. Therefore, the impact of such development on the environment has been weighed up against the benefits to the wider social and economic needs of the community in a process that has involved independent scrutiny. In considering the Local Plan the Inspector concluded that previously developed land is insufficient in the area and to meet development needs an urban extension is a more sustainable option, rather than a continuation of the previous trend of accommodating development in or around the District's villages, many of which are within the High Weald AONB.

- 2.15 With regards to objectives C and E, this exercise has revealed an inconsistency between the aims of the two objectives, with C seeking integration with the town on all levels, while E requires a clear character and sense of place consistent with a new community.
- 2.16 These two objectives, developed by stakeholders, are seen as two possible alternative approaches to development at North East Bexhill, and consequently have been developed into options to be considered at Stage B2 of the SA process.

3. Task B2: Developing the SPD options

- 3.1 This task requires providing a range of choices or options for delivering the SPD objectives. The ODPM guidance states that only reasonable, realistic and relevant options need be put forward. It also states that "*Given the duty under the Act on those preparing an SPD to contribute to sustainable development, it is essential for it to set out to improve on the situation which would exist if there were no SPD"*. It should also aim to add further to the effects of Local Plan policies, BX2 and BX3.
- 3.2 In order to test this, an option of 'no SPD' can be included in the range of options developed at this task. However, in the case of the North East Bexhill SPD, this is not to be a viable option to be tested, in view if the fact that the decision to make an SPD has been supported by the Inspector at the Local Plan public inquiry to assist delivery of Policies BX2 and BX3.
- 3.3 The relevant guidance states that "the options need to be sufficiently distinct to highlight the different sustainability implications of each, so that meaningful comparisons can be made". The options are then tested against the sustainability objectives that form the Sustainability Framework.
- 3.4 Two options with regard to the approaches to development at North East Bexhill have evolved following consultation with the relevant stakeholders and by testing the internal compatibility of the SPD objectives. Each of the options will facilitate development with quite different characteristics, as follows:

		Characteristics				
	Housing Mix	Orientation	Services	Layout	Accessibility	Design
Option A – New Community	Balance of sizes and types	Inward- facing	Self- sufficient	Facilities centrally located	Radial routes from centre of site; low penetration	Strong distinct identity
Option B – Urban extension	Mix skewed to create balance in wider area	Outward- facing	Partly reliant on existing facilities	Facilities may be on edges	Strong links to existing areas	'Organic' growth of existing areas

- 3.5 It is noted that it is not the role of the SA to make the decision as to the option to be chosen, but to provide a process by which the sustainability effects can be examined and to identify how any potential negative impacts mitigated against.
- 3.6 As part of testing these options against the Sustainability Framework, planning authorities are encouraged in the relevant guidance, to use a matrix to document the prediction and appraisal of Plan options. This task has been completed and is set out in Appendix 6.
- 3.7 Both of the options have strengths, although Option B scores more highly overall, in respect of the sustainability of its characteristics and the principles of integration. Equally, there are more uncertainties with regard to the impacts that Option B may have, and it is acknowledged that this is due to the uncertainties over the form of development, travel choice and the final recommendations of the SPD.

4. Predicting the effects of the draft SPD (Task B3)

- 4.1 The social, economic and environmental effects of the options being considered for the North East Bexhill SPD have been predicted in relation to each of the SA objectives that form the sustainability framework.
- 4.2 The effects need to be quantified where this is possible. Where such an approach is not possible, the effects may be judged in the context of the baseline situation, the current position of which is indicated at Appendix 3. The guidance states that broad-based and qualitative predictions can be equally valid and appropriate though should be backed by evidence which indicates how conclusions have been reached.
- 4.3 The ODPM guidance requires that prediction involves describing the changes in terms of their "magnitude, geographical scale, the time period over which they will occur, whether any changes are temporary or permanent, positive or negative, probable or improbable, frequent or rare, and whether or not they are secondary, cumulative and/or synergistic effects" where this is possible.

Methodology for determining the magnitude of effects

4.4 In determining the magnitude of effects to the baseline conditions which will result with the implementation of the North East Bexhill SPD, the following table indicates the methodology used when determining the magnitude of effects.

Magnitude of Effect	Description	
Major	Effect resulting in a considerable change in baseline conditions with undesirable/desirable consequences.	
Minor	Effect resulting in a discernable change in the baseline conditions with undesirable/desirable consequences.	
No effect	No discernable change in baseline conditions	

Secondary, cumulative and synergistic effects

4.5 The SA guidance and the SEA Directive requires an assessment of secondary, cumulative and synergistic effects. These are assessed by the following terms:

<u>Secondary effects</u> – are effects that exist as a result of a secondary or more distant relationship with the plan.

 $\underline{Cumulative\ effects}$ – occur when several implemented actions have an effect, but individually are insignificant.

<u>Synergistic effects</u> – interact to create a situation which is greater than the sum total of the constituent parts. These effects happen when habitats, resources and human communities get close to capacity or viability.

4.6 The table at Appendix 7 carries out the task of B3 and predicts the effects of each individual option relating to the approach to development at North East Bexhill.

5. Task B4: Evaluating the effects of the draft SPD

- 5.1 The ODPM guidance states that '*having identified and described the likely effects* of the SPD, an evaluation of their significance needs to be made. When forming a judgement on whether a predicted effect will be significant, it is necessary to consider the probability, duration, frequency and reversibility of the effects, including secondary, cumulative and synergistic effects".
- 5.2 This task has been carried out using the same table generated for task B3, as predicting the effects of the plan is an inherent link to evaluating its effects and requires a similar approach and consideration. (see appendix 7)
- 5.3 The SA has identified that there are a number of likely social, economic and environmental sustainable benefits, associated with both of the options tested. These include:
 - The provision of high quality housing, including affordable housing to ensure that housing needs are met;
 - Provision of well designed, high quality built environments, with access to public open space;
 - Provision of additional services and facilities for new and existing residents, including the new primary school;
 - Encouragement of walking and cycling and public transport use through the provision of safe footpaths, cycle routes and bus stops throughout the development;
 - Increased investment and employment opportunities as a result of the major business development.
 - Protection of woodlands, hedgerows and trees to support biodiversity
- 5.4 In addition both options would benefit from the sustainable homes agenda where sustainable measures such as information on best practice, sustainable design and construction techniques would be integrated into the SPD.
- 5.5 As can be seen there is an overall bias toward social benefits of both the options, and development should bring about major positive benefits in the short, medium and long term. Approaching the development of North East Bexhill as an urban extension (Option B), would appear to have the potential to extend the social benefits over a wider area and positively impact on a greater population.
- 5.6 Option B also has the potential to magnify the positive outcomes of the economic objectives, as increased linkages may support economic revival by the increase in the linkages between the existing and new communities.
- 5.7 Potential adverse effects of both the options include:
 - Use of undeveloped, greenfield land;
 - Temporary short term environmental impacts, while the development is under construction;
 - Increased surface run off due to impermeable surfaces;

- Loss off some hedgerows and trees and the subsequent impact on some habitats;
- Increased road traffic and the resulting impact on noise and air pollution and climate change;
- Increase in water consumption and waste creation, once the development is operational;
- 5.8 These adverse effects have implications for the environmental objectives. The differing characteristics of either option does not seem to impact significantly on the intensity of the environmental impacts, although the more remote siting of services and facilities of the development facilitated by Option B, may exacerbate road congestion and pollution levels.
- 5.9 However, the reverse may be true if sustainable travelling habits are fostered by the existing and the new communities, with services and facilities being located at the interface between the existing and proposed developments.

6. Task B5: Considering ways of mitigating adverse effects and maximising beneficial effects.

- 6.1 The SA report must include measures to mitigate against any adverse effects of the SPD. These may include changes to the SPD document, refining policies, additional information at the planning application stage, technical measure in the implementation stage and recommendations for changing other plans and programmes.
- 6.2 The mitigation measures suggested would apply to both of the options proposed and are born out of the potential adverse effects cited in paragraph 5.7.
- 6.3 Short term environmental impacts may be negated by the requirement of method statements and environmental impact statements being submitted at the time of any planning application.
- 6.4 Surface water run off from the sites may be managed by a drainage strategy and with the implementation of a variety of sustainable urban drainage systems including ponds and wetlands, trenches, permeable pavements and rainwater re-use.
- 6.5 It is proposed that losses to trees and hedgerows will be kept to a minimum, with development taking place in the open spaces, but any losses to habitats can be reduced by maintaining wildlife corridors. Protecting habitats and enhancing the ecological value of sites, is also covered by a generic policy within the local plan.
- 6.6 The design principles of the SPD will be pro non-car to include developing 'greenways' and supporting other sustainable transport options to reduce car journeys, which will go some way to addressing the adverse effects of increased road traffic and any consequential impacts on the environment.
- 6.7 The increased demands on water provision may be addressed with the requirement that the development incorporates measures to reduce water consumption with the provision of water saving devices, rainwater' harvesting' and grey water recycling.
- 6.8 The construction of a development of the scale proposed, will provide many opportunities for a sustainable approach to design, construction and energy generation.
- 6.9 In terms of refining the document, the SA process has highlighted that a more sustainable approach socially and economically would be to ensure that the new development is integrated with the existing community.
- 6.10 The aim of objective E therefore has been changed from so that development has a highly sustainable character and a 'sense of place' consistent with the other objectives, rather than the emphasis being on a 'sense of place' being contingent with a new community.

- 6.11 For clarity it is also considered appropriate to expand upon and put into context objective D, to explain that development should protect and enhance the environmental quality of the town, and its environment, rather than the environment generally.
- 6.12 The revised objectives For the SPD are listed below:
 - A. Provides a high quality sustainable extension to Bexhill, which enhances the attractiveness of the town as a place to live, work and invest
 - B. Contributes to meeting the economic and social needs of the town and its existing and future residents
 - *C.* Is physically, economically and socially integrated with the town and its wider environment
 - D. Protects and enhances the environmental quality of the town and its environment
 - E. Has a clear character and highly sustainable character and 'sense of place' consistent with the above

7. Task B6: Proposals for monitoring

- 7.1 Indicators identified within the baseline evidence and supporting the Sustainability objectives will contribute to the monitoring of the sustainability effects of the SPD.
- 7.2 The Council's Annual Monitoring Report (AMR) will also assist by providing a regular assessment of the performance of plans and policies adopted by the Council.
- 7.3 It is recommended that additional monitoring be carried out in connection with the North East Bexhill SPD in respect of the following:

8. Task C1: Preparing the Sustainability Appraisal Report

- 8.1 The Sustainability Appraisal Report is the key output of the appraisal process, presenting information on the effects of the draft SPD on which formal public consultation is carried out.
- 8.2 The Sustainability Appraisal Report must also show how the Strategic Environmental Assessment (SEA) Directive's requirements have been met, and this is registered at appendix 1

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Appendices