

NORTH EAST BEXHILL 'MASTERPLAN' SUPPLEMENTARY PLANNING DOCUMENT

CONSULTATION STATEMENT

Purpose

1. This Statement has been prepared by Rother District Council to accord with Regulations 17 and 18 of The Town and Country Planning (Local Development) (England) Regulations 2004, to set out who has been consulted in preparation of the North East Bexhill Supplementary Planning Document SPD, how they were consulted, the issues raised, and how these have been addressed in the adopted SPD.
2. It also aligns with the Council's own 'protocol' for public involvement in the preparation of 'local development documents', as set out in its 'Statement of Community Involvement', which was adopted in August 2006.

Context

3. The draft North East Bexhill 'Masterplan' SPD was published, together with the associated Sustainability Appraisal, for public consultation over a 6 weeks period from 15 June to 27 July 2007.
4. The SPD has now been published in revised form for adoption. This and the Sustainability Appraisal can be viewed at www.rother.gov.uk/ldf and are available for inspection at the Council's Community Help Point in Bexhill.

Preparation of the Draft SPD

5. Key stakeholder engagement was primarily through creation of the 'North East Bexhill Development Group'. This was established in 2005. It comprises representatives of the landowners, developers with a legal interest in the sites, relevant agencies and Council officers, as well as the Community Associations for the two adjoining areas of Pebsham and Sidley.
6. The Group has met regularly under the chairmanship of Councillor Brian Kentfield, Cabinet portfolio holder for LDF work, and guided by the Government's Advisory Team for Large Applications (ATLAS). Minutes of meetings are kept. The members are:

Rother District Council	Sidley Community Association
ATLAS	Pebsham Community Association
East Sussex County Council	Trinity College
Seaspace	Tiger Investments
English Nature	Hillreed Developments
Southern Water	Mr H Boeijink
Environment Agency	Mr P James
Highways Agency	

7. Matters considered by the Group have included:
 - Overall programme for SPD preparation
 - The vision for development
 - Relationship with the Bexhill Hastings Link Road
 - Adequacy of local infrastructure
 - Need for additional information
 - Form of development and relationship with existing areas
8. A Collaborative 'Design Workshop' was held in November 2006 to consider the draft findings of consultants employed to investigate a number of issues, including transport capacity, employment and housing market potentials, drainage, ecology and design considerations.
9. A wider range of stakeholders were invited to the Workshop, including additional community representatives. As well as considering emerging expert advice workshop groups developed options for the detailed form and layout of development.
10. Engagement with local communities has also been pursued through the Local Action Planning processes in Sidley and Pebsham.
11. A presentation was given to the action planning group, following an earlier presentation to the Board of the Sidley Community Association.
12. A request to attend and address a Pebsham Community Association meeting was made, but not taken up to date. However, a Briefing Note was provided to the Local Action Plan co-ordinator to help raise awareness of proposals. Feedback from a Pebsham "Action Planning" day has provided information on local issues relevant to the SPD.
13. The key issues for major development at Bexhill have also been highlighted, in discussions with the Local Strategic Partnership in connection with preparation of a longer-term 'Core Strategy'.

Key Issues and the Draft SPD

14. Notable local issues raised by stakeholders on the Development Group were:
 - Range and supply of jobs
 - Access to new jobs
 - Housing mix
 - Impacts on traffic movements
 - Nature conservation interest of the area
 - The sustainability of development
 - Improving open space provision, especially in the east
 - Infrastructure adequacy, including schools and water

15. As well as seeking to address these by dialogue within the Group, a number of further studies were commissioned. These were:
 - Ecological Survey
 - Badger Survey
 - Strategic Transport Assessment
 - Drainage and Flood Risk Study
 - Business Land Market Assessment
 - Housing Market Assessment
 - Design Study
16. The findings of these studies were discussed via the Design Workshop, as noted above, prior to being taken into account in the preparation of the draft SPD. The Workshop groups' options have been instrumental in formulating the Draft SPD.
17. Specific implications for the draft SPD have been:
 - Key landscape features of ecological value highlighted and protected
 - Amendments to development areas to protect badger setts and foraging routes
 - New proposals for improved connectivity between the development areas and existing communities
 - The need for both on-site and off-site cycle routes highlighted and required
 - Better understanding of traffic impacts on wider network, and requirements for improvements
 - Provision for a sustainable drainage system
 - Further emphasis on energy efficiency
 - Careful attention to relationship of housing with existing residential areas, including size and tenure mix.
18. The relationship between the development allocations and neighbouring areas was further assessed in detail as part of the Sustainability Appraisal.

Consultation on the Draft SPD

19. The draft SPD was made available for public consultation for 6 weeks (the maximum period prescribed by Regulations).
20. Copies of the document were sent to all 'specific and general consultation bodies' affected by the development, as well as other agencies and organisations that may contribute to its delivery.
21. Public exhibitions were held in both Pebsham and Sidley, as well as in Bexhill town centre, on 25th, 29th and 30th June 2007 respectively.
22. Representations could be made online as well as in writing or by email. There were 64 representations received during the 6-week consultation period. The main areas of comment on the Draft SPD are presented, by section, together

with Officers' responses, in Appendix 1. All individual representations have also been addressed – see summaries on the Council's website under 'Supplementary Planning Documents' at www.rother.gov.uk/ldf .

23. The revised SPD that is put forward for adoption takes account of the newly adopted South East Plan. Also, the Sustainability appraisal has been updated to take account of the amendments to the Draft version. This is also available on the website.

Appendix 1. Overview of representations and responses

A total of 64 representations were received during the 6-week consultation period. These come from a range of landowners, public authorities, developers/consultants, service providers and interest bodies. There were few individuals' comments, although views expressed by people who attended exhibitions held in the Pebsham and Sidley Community Centres have been noted.

The main areas of comment on the Draft SPD are presented, by section, below, together with Officers' recommended responses.

Section 1 Introduction

There were no adverse comments on the Introduction.

Section 2 Sites and Locality

ATLAS thinks the term 'Masterplan' is misleading and the document would be better entitled. 'SPD for NE Bexhill' as further master-planning is required as a detailed context for planning applications. Also, the SPD should be presented in a high quality form to support marketing the site as a premier location for business facilities and residences which employs energy efficient design and renewable energy technologies.

English Heritage is concerned that the document is somewhat dismissive of potential archaeological remains.

Response:

- a) The final document will be produced to a professional standard to help demonstrate the Council's commitment to achieving this highly sustainable key development for Bexhill.*
- b) Although not a defined archaeological site, reference to the need proper assessment of potential interest, and the need for consequent investigation, in line with the Local Plan Policy GD1, will be highlighted in the adopted SPD.*
- c) Refer to the document just as a Supplementary Planning Document without the term "Masterplan", recognising that further master-planning is required.*

Section 3 Policy Background

SEEDA recognises North East Bexhill as a key strategic site for the coastal South East. Hastings Borough Council comments that the development is vital to the regeneration of Bexhill and Hastings.

The Highways Agency suggests that a joint transport strategy covering all of Bexhill and Hastings to provide the context for measures to increase the proportion of travel by sustainable means.

ATLAS suggests reference to the topic-based studies, options testing and stakeholder engagement.

Response:

a) A Hastings - Bexhill 'Local Area Transport Strategy' is in preparation, and this will be referenced as a context for future proposals.

b) Reference to the stages in the development of the SPD and related evidence studies will be outlined in the Introduction.

Section 4 Vision

ATLAS is supportive of the Vision, but suggests that it could go further in conveying the nature of spaces and forms of development sought.

Response:

It is considered that the objectives provide an appropriate framework for "place-shaping" together with the description of the development presented as a "commentary" set in the future. This latter statement (at paragraph 4.8) will be given more emphasis as part of the Vision.

Section 5 Development Principles

Landowners seek clarification that the 'off site' public open space to the north of BX2 is intended to contribute to meeting the needs arising from the development of the BX2 Site.

The SDP should explain the term 'extra care scheme'.

It should clarify entry level for shared equity housing; 25% should be an indicative target not a rigid requirement.

Another development interest states that it is not known whether the package of infrastructure requirements is deliverable, as the 'Masterplan' has not been subject to any viability appraisal.

ATLAS suggests that the principles for land use include flexibility to create a balanced community and creating an active and vibrant heart. A maximum density should be set. It suggests that the 'Access' principles read as a series of junctions and roads, rather than establishing the character of the place through movement routes and spaces, street hierarchy, road design, and the fact that they should be

designed in an integrated way. It makes some detailed presentation points. Recommends setting a target of the Code for Sustainable Homes (e.g. level 3).

Highways Agency wants no occupation until the Link Road is open.

Bexhill Town Forum: Need to further emphasise importance of external linkages and need in-depth examination of infrastructure requirements.

East Sussex County Council expresses concern over the timely delivery of community facilities and would like to see a cycle route connecting Bexhill High and St. Richards Community College. It seeks several detailed amendments to references to its services.

Hastings Borough Council supports maximising employment potential, especially via providing serviced plots, and would like it to complement provision being made elsewhere with flexibility in range of B class uses.

South East Regional Assembly would like the SPD to be improved by a more detailed analysis of how public transport and other non-car modes can be viably delivered as part of the development.

English Heritage supports integration with existing urban fabric and the design principles.

SEEDA welcomes principles relating to high quality business space provision, encouragement to 'eco-industries', affordable housing, energy efficiency and sustainable transport.

Learning and Skills Council supports content.

Sea Space believes that the release of the employment land, and serviced plots, is vital to the fortunes of both Bexhill and Hastings. Enough flexibility is required within guidance for a change in local economy. It will explore public intervention if necessary. It supports the multi-model approach. Good bus services and the use of the link road as a bus route are favoured.

BWEA supports vision for a low carbon sustainable development and suggests that a policy for mandatory onsite renewable that provides 10% of electricity for all building needs.

East Sussex Transport 2000 objects to the development as it relies on the link road and will pre-determine the car as the prime mode of transport. They recommend the 'Manual of the Streets' as an essential tool for implementing visionary and sustainable plans, for which contributions should be used.

Southern Water supports the holistic approach to infrastructure and acknowledges that there is only limited capacity in the foul sewerage systems and that improvements will be needed to service the proposed development area. They support the objective of SUDS.

Response:

a) Additional explanation of the housing and open space provisions and their interpretation will be given.

b) The 'Access' section will be broadened to more clearly embrace the contribution of the movement hierarchy to the sense of place. It will, more appropriately, be renamed 'Access and Movement'. Also, the role of roads and streets in community design, place-making and identity of development will be strengthened.

c) The SPD will clarify that the Highways Agency's advice is that there should be no occupation in advance of opening of the Link Road, but that if a 'transport assessment' demonstrates that a part of the site may be occupied in advance of opening without a material adverse impact, then the Council would accept this but only when the final decision on the Link Road is made (and subject to its integration with the overall masterplan – see Section 8). 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.

d) The SPD will give emphasis to both high levels of energy efficiency and use of renewable energy, in accordance with the findings of the study of energy potentials, as well as most recent national and regional guidance. The measures being promoted should aim that housing achieves Level 4 of the Government's Code for sustainable Homes.

e) Cross-reference will be made to the approach to development viability, including the funding of infrastructure, set out in Section 8: Implementation.

Section 6 Land North of Pebsham

East Sussex County Council think that due to the topography of the site, the school would be more appropriately located north of Upper Worsham Farm and would like to see childcare facilities attached to the school.

Developers support the idea that the land behind Alford Way, and south of Pebsham Stream, should be considered for early release, for development of up to 120 dwellings, noting it is served by existing drains and that Pebsham Lane is served by an existing bus route.

Local residents variously express concern that

- Wrestwood Road is approaching maximum capacity and that the employment land will still generate traffic on the main Bexhill Road network;
- the employment areas are close to the back of the houses in Bodiam Avenue, affecting house prices;
- no footpath opposite St Mary's School;
- suggest High Street relocated to opposite The Glades;

- traffic will cut through the new development area along the arterial access road and Seabourne Road;
- a 'green corridor' should be behind dwellings in Alford Way.

A local Church welcomes provision for a church (with a large hall) but prefers a location closer to Pebsham.

A major supermarket company wants to see provision made for a quality supermarket.

Response:

a) In the light of further discussions with the Local Education Authority, it is agreed that the primary school be relocated from the north side of the "green corridor" following the valley through the site to flatter land to the north east of the present site. This change is proposed in concert with an amendment to the internal road layout, as proposed at (d) below. It is also proposed that the community building, which should accommodate pre-school activities, should also be relocated to an adjoining site and adjoining the main public open space/playing fields.

b) As discussed under 'Development Principles', the potential for planning permission on land with existing access off Pebsham Lane in advance of full applications for the remainder of the BX2 allocation, and in advance of completion of the Link Road, will be set out. This will be in terms of timing vis-à-vis the Link Road (as above), provision for the extension of the access road, development contributions proportionate to the scale of residential development, agreement for off-site drainage, and the relationship with existing development.

c) The need to provide for convenient pedestrian access along and across Wrestwood Road will be added.

d) The potential for 'rat-running' through the new development and Pebsham is acknowledged. The need to deter this will be addressed by removing the direct route through the development into Pebsham Lane and amending the internal road layout so it is an extended loop off the spine road, with a spur directly back onto Wrestwood Road (as originally proposed in the Local Plan). However, it is still considered potentially beneficial to provide a vehicular connection between the existing and new development, certainly for bus access.

Therefore bus access (as well as cycle and pedestrian links) must be provided, with the option of allowing other traffic retained for further scrutiny when detailed layouts are proposed. Consideration should be given to the design of the connecting road, the creation of squares and other traffic management/calming measures in deterring rat-running, which must be effective if a link open to all vehicles is included.

e) The need to limit the height of dwellings immediately to the rear of existing bungalow properties in Alford Way will be added (but it is not considered that there is a substantive case for a further 'green corridor' on this alignment).

Section 7 Land North of Sidley

Residents of Buckholt Lane are concerned over the treatment as it passes through the Sidley part of the development, as it is only way of accessing a number of properties. Lorry access is required. They don't want it to be a vehicle access to the proposed countryside park.

Hastings Borough Council suggests that the SPD should be more positive towards general industry and distribution activities.

Sea Space wants the configuration of sites to be indicative, to allow for needs of occupiers to be met.

East Sussex County Council wants to retain the potential for future access westwards. Any use of Watermill Lane should be further assessed to ensure that highway safety and capacity are not compromised.

SEERA wants further consideration of public transport in the area.

Response:

a) The text be amended to clarify the role of Buckholt Lane in providing access to a number of properties, including farms and businesses, and that this needs to be properly retained.

b) Access points to the Countryside Park, as indicated in the Board's 'development strategy' will be added to the relevant plans, and the text will confirm their nature.

c) Textual reference will be made to the possible future extension of the 'Country Avenue' westwards in association with longer term development, and the need to take account of this.

d) Figure 9 and the text be amended to show proposed bus access, in accordance with the 'Access' principles.

Section 8 Implementation

The Highways Authority may wish to secure 'Local sustainable access improvements' contributions. Any development advance of the link road would have to be supported by a transport assessment.

Hastings Borough Council would like to see a link made between the provision of housing and employment in terms of phasing of the site.

South East Regional Assembly stresses the need for the development to contribute to the link road. They believe that a table should be added to clarify in terms of scale, scope and timing of contributions to the link road.

ATLAS suggests it should set a clear strategy to move the site forward, including how and when critical infrastructure will occur, phasing of business land in relation to residential and the planning process to be followed.

Other development interests think that section 8 fails to set out a realistic programme for the Link Road. It doesn't identify how any shortfalls in public funding for the link road will be made up in order to enable the link road to proceed. It is not explained how the community and employment uses are delivered alongside new housing, and the implications this may have for delivery. They observe that there is no obvious inter-linkages between the provision of new jobs and the social/community infrastructure.

Landowners would like to see the final SPD to provide greater clarity about the expected contributions to be delivered through the Section 106 and viability assessments will provide greater clarity in terms of scope and level of S 106 contributions. Flexibility is needed to allow for unexpected costs. A contingency plan should be set out if land ownership issues arise and become a barrier to development.

Response:

Section 8 will be considerably elaborated upon to include a clearer 'implementation plan', drawing on the advice recently received on viability issues. In particular, it will:

- a) recognise the uncertainties that remain on costs and values at this time;*
- b) update the programmes for both development and the Link Road, as agreed with East Sussex County Council;*
- c) set out a basis for early release;*
- d) 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);*
- e) indicate the respective roles of key agencies in achieving the development.*