Question 12.1

Environmental sustainability covers a wide range of issues and the Core Strategy provides the opportunity to bring these together under a strategic policy which can be supported by more detailed specific polices and planning guidance. The strategic policy, which will relate to new development, needs to cover issues such as:

light, air ,noise and water pollution
the risk from flooding
minimising water use and requiring water conservation and recycling
sustainable urban drainage systems
incorporating renewable energy production facilities into new developments to minimise carbon dioxide production
minimising energy use through appropriate layout and orientation, building form and design, and design to take account of the micro-climate
incorporating recycling facilities and using waste as a resource wherever possible.

What other issues need to be covered in a general policy?

Responses to this question: Total number of responses: 57
Individuals: Total 33
Baird (1), Braybrooke (4), Castle (8), Central St Leonards (1), Conquest (1), Gensing (2), Maze Hill (1), Old Hastings (4), Ore (2), Silverhill (2), Tressell (2), West St Leonards (1), Other (4).

Local Groups: Total 9
Castle Court Residents Association, Hastings & Rother LA21, Hastings & Rother Urban Design Group, Hastings and Rother Disability Forum, Hastings Environment Network, Old Hastings Preservation Society, Ore Valley Forum, Speckled Wood Group, Transport 2000.

Developers: Total 1
Walden Pond Housing Co-operative LTD.

Statutory agencies: Total 6
East Sussex County Council, English Partnerships, Environment Agency, Forestry Commission, Highways Agency, Southern Water

Other (including anonymous): Total 8
Anonymous (6), Planning Potential, Rother Amenities Service

Ref 9
Ward Baird
Response ref 12.1/1
Individual/name of organisation Individual
Summary of comments The town needs to improve its recycling system. If people haven't got a car they won't take bottles and jars on the bus to the recycling centres.

Ref 15
Ward Gensing
Response ref 12.1/2
Individual/name of organisation Individual
Summary of comments Encouraging a fashion of simply wearing more appropriate clothing would help. As a fishing port we have a built-in advantage here at least in popularising weather proofs. Again, our beach is not good for well nigh naked sun worship but excellent for walking, pool dipping etc. Advertise that aspect on our brochure!

Ref 28
Ward
Response ref 12.1/3
Individual/name of organisation Rother Amenities Ser
Summary of comments Transport links between dense residential populations and Local amenities to minimise car travel and provide for pedestrian and cyclists.

Ref 33
Ward
Response ref 12.1/4
Individual/name of organisation Anonymous
Summary of comments Link to transport issues. What about need to improve existing housing stock (better insulation etc)

Ref 21
Ward
Response ref 12.1/5
Individual/name of organisation Walden Pond Housing Co-operative LTD
Summary of comments Adding renewable energy provision of existing housing, if possible creating incentives to do so. Supporting setting up of local (illegible word) businesses in the fields of renewable energy, recycling, composting etc.

Ref 35
Ward Central St Leonards
Response ref 12.1/6
Individual/name of organisation Individual
Summary of comments When promoting and encouraging renewable energy it should always be from a decentralisation point of view and not sourced from the national grid.
Otherwise agree with 12.1-12.9

Ref 19
Ward
Response ref 12.1/7
Individual/name of organisation Speckled Wood Group
Summary of comments A policy of planning for car use that reflects the trends in car ownership

Ref 31
Ward
Response ref 12.1/8
Individual/name of organisation Individual
Summary of comments May need to include training of councillors in climate change and environmental & sustainability issues

Ref 82
Ward Castle
Response ref 12.1/9
Individual/name of organisation Individual
Summary of comments The SMP while recommending “holding the line” does not indicate in the long term whether it will work, or how much it will cost. For example who will pay for defending the seafront?

Ref 81
Ward Silverhill
Response ref 12.1/10
Individual/name of organisation Individual
Summary of comments Use of sustainable and or biodegradable materials and or recycled. E.g. wood from sustainable forests, recycled insulations etc.

Ref 133
Ward
Response ref 12.1/11
Individual/name of organisation Anonymous
Summary of comments Encouragement and assistance should be provided to all households not just new developments or new builds. Recycling programmes should be incorporated into new developments and more facilities should be available in established areas.

Ref 77
Ward
Response ref 12.1/12
Individual/name of organisation Ore Valley Forum
Summary of comments Bath water should be recycled to flush toilets. Reduce flow taps in new developments. More green spaces to allow rain runoff to sink into the water table thus aiding flooding and water shortage. Don't build on floodplains – allow these areas to flood.

Ref 130
Ward Castle
Response ref 12.1/13
Individual/name of organisation Individual
Summary of comments Require redeveloped old building to include renewable & sustainable technologies as well as new ones. Make planning consent for solar, thermal/PV and turbines easier. Encourage neighbours to combine assets to get renewable provision.

Ref 132
Ward Ore
Response ref 12.1/14
Individual/name of organisation Individual
Summary of comments Flood-lit sports pitches cause light pollution. Is this legal? People who do not re-cycle should be fined. Water meters should be mandatory. Fines for dog-fouling and littering should be stringently enforced.

Ref 138
Ward Gensing
Response ref 12.1/15
Individual/name of organisation Individual
Summary of comments Development plans to give attention to the adequate and effective siting of rainwater drains and drainage gulleys and investigate the possibility of storage/recycling

Ref 75
Ward Castle
Response ref 12.1/16
Individual/name of organisation Individual
Summary of comments There is now a higher risk of sea floods than reflected in the LDF. Rising sea levels and increasing storm intensity mean more of the town is likely to be flooded i.e. Old Town, Town Centre, and much, if not most of the seafront risks serious damage.

Ref 128
Ward
Response ref 12.1/17
Individual/name of organisation Anonymous
Summary of comments Free Electricity. Water Power. Use major city sewage from Scotland down to the south to power turbines on the way and pumping stations larger pipelines with a gradient sloping from Scotland down to southern hotspots. Plus water pipelines from north to south powering electricity turbines on the way cheap electricity and solve water problem.

Ref 106
Ward Castle
Response ref 12.1/18
Individual/name of organisation Individual
Summary of comments Not to build where there is likely to be flooding in the future

Ref 96
Ward Tressell
Response ref 12.1/19
Individual/name of organisation Individual
Summary of comments Carbon neutral houses

Ref 92
Ward Castle
Response ref 12.1/20
Individual/name of organisation Individual
Summary of comments French nuclear power station/pollution/terrorism/contingency planning

Ref 93
Ward
Response ref 12.1/21
Individual/name of organisation Individual
Summary of comments The type & function of businesses locating in Hastings – not just new developments but those moving into existing space eg change of use
Transport considerations – encouraging sustainable modes, discouraging car use.

Ref 86
Ward Braybrooke
Response ref 12.1/22
Individual/name of organisation Individual
Summary of comments All of the above should adhere and abide by the highest eco and environmental standards. No starting at the bottom and meeting weak standards, but aim high and deliver everything in line with the strictest. If contractors do not like it sack them (if possible) and get new ones .

Ref 91
Ward West St Leonards
Response ref 12.1/23
Individual/name of organisation Individual
Summary of comments Built environment! Protection of buildings of value, maintaining the character of the various parts of the town and its local distinct character and community pride.

Ref 85
Ward
Response ref 12.1/24
Individual/name of organisation Anonymous
Summary of comments Glass and textiles door step collections

Ref 116
Ward Old Hastings
Response ref 12.1/25
Individual/name of organisation Individual
Summary of comments I understand that it is easier to get planning permissions to install a satellite dish than it is for a wind turbine which for the average house is comparable in size to a satellite dish. More help/encouragement, planning laws relaxed to allow installation of the relatively unimposing domestic turbines, likewise solar panels should also be encouraged, not just on new homes. What proportion of the towns energy could be generated with its own wave generator, located close to lighthouse, surplus energy sold back to national grid.

Ref 114
Ward
Response ref 12.1/26
Individual/name of organisation Hastings & Rother LA21
Summary of comments Replacing any carbon sinks in the form of trees and shrubs lost due to development, an area of land should be allocated to accommodate with planting and other costs funded by developers. Thousands of trees have been lost in recent years very few replaced.

Ref 115
Ward Ore
Response ref 12.1/27
Individual/name of organisation Individual
Summary of comments Encourage and enable individual Householders to reduce their “carbon footprint” e.g. planning permission for solar panel and wind turbines and “beefed up” grants for these and household insulation.

Ref 101
Ward
Response ref 12.1/28
Individual/name of organisation Old Hastings Preservation Society
Summary of comments Reuse existing buildings

Ref 90
Ward Castle
Response ref 12.1/29
Individual/name of organisation Individual
Summary of comments All matters set out in para 12.6 of “Shaping Hastings”

Ref 119
Ward Maze Hill
Response ref 12.1/30
Individual/name of organisation Individual
Summary of comments Ensuring that local people know and understand what their individual responsibilities area. The local authority & other agencies cannot do this alone, it requires individual participation.

Ref 111
Ward
Response ref 12.1/31
Individual/name of organisation Anonymous
Summary of comments Then can we have a policy that actively controls the installation of PVCU windows. All over the town these windows are being installed with no thought of the impact on the building and the appalling effect on the environment with all that plastic. Box sash windows that are triple glazed would be much more effective.

Ref 80
Ward Castle
Response ref 12.1/32
Individual/name of organisation Individual
Summary of comments Open by a national/international dialogue with our neighbour's whole pollution impacts on our environment. Interreg would facilitate a seminar with the French on this one for instance

Ref 107
Ward
Response ref 12.1/33
Individual/name of organisation Anonymous
Summary of comments Use best European sustainable design standards; passive solar, green roofs etc. we could be a show sustainable community.

Ref 105
Ward
Response ref 12.1/34
Summary of comments Hastings Environment Network
Composting facilities, rain water harvesting, energy efficiency

Ref 76
Ward Tressell
Response ref 12.1/35
Individual/name of organisation Individual
Summary of comments Encourage and facilitate all forms of micro-generating. Not just wind generators, and solar panels, but this use of photo–voltaic cells even in Conservation Areas, find ways to make existing development more sustainable, and continually improve standards of insulation etc.

Ref 41
Ward
Response ref 12.1/36
Individual/name of organisation Castle Court Residents Association
Summary of comments Design quality, the single most important factor in securing longevity and efficiency

Ref 45
Ward Braybrooke
Response ref 12.1/37
Individual/name of organisation Individual
Summary of comments Reducing the need to travel

Ref 123
Ward
Response ref 12.1/38
Individual/name of organisation Individual
Summary of comments As an area we are short of water – this must feature in this section.

Ref 108
Ward
Response ref 12.1/39
Individual/name of organisation Hastings and Rother Disability Forum
Summary of comments Making sure there is enough lighting so that people feel safe and so that disabled people can move easily at night. I think of Duke Road and Gensing Gardens where lighting is very poor.

Ref 122
Ward
Response ref 12.1/40
Individual/name of organisation Hastings & Rother Urban Design Group
Summary of comments Sunlight, micro wind generators which could conflict with other issues, esp in conservation areas, minimise is too vague a term. It should either be zero carbon or a significant % reduction (50%) on a baseline standard.

Ref 50
Ward Braybrooke
Response ref 12.1/41
Individual/name of organisation Individual
Summary of comments Forecast and design of areas that will offset the damage caused to the seafront area by climate change.

Ref 30
Ward Conquest
Response ref 12.1/42
Individual/name of organisation Individual
Summary of comments Not just light but sunlight (essential to health) – a standard used to exist on this but has gone out of use. BRS daylight protractors could be brought back into use. E.g. minimum of one hour of sunlight in all living spaces on shortest day of year. For sustainability reasons there should be clear policies to assist local people into housing e.g. self build sites identified. You have no link between building conservation and environmental conservation

Ref 60
Ward Old Hastings
Response ref 12.1/43
Individual/name of organisation Individual
Summary of comments Underground car parks on the coast probably not a good idea: Witness the existing cost and trouble at White Rock/Queens site

Ref 61
Ward Castle
Response ref 12.1/44
Individual/name of organisation Individual
Summary of comments Set standards and targets and monitor them. Lots of organisations have laudable environmental objectives but fail to deliver them (“Greenwash” I think it is called)

Ref 63
Ward Silverhill
Response ref 12.1/45
Individual/name of organisation Individual
Summary of comments Need for a link with the Transport issues section i.e. commitment to less car use and more bus cycle and walking facilities

Ref 158
Ward
Response ref 12.1/46
Individual/name of organisation East Sussex County Council
Summary of comments There is scope in this chapter to acknowledge the Construction Waste SPD and also include examples of reducing waste.

Ref 65
Ward
Response ref 12.1/47
Individual/name of organisation English Partnerships
Summary of comments Green travel & car reduction. Reuse of buildings and use of sustainable materials

Ref 53
Ward Braybrooke
Response ref 12.1/48
Individual/name of organisation Individual
Summary of comments Need to seek advice from Friends of the Earth etc !

Ref 67
Ward
Response ref 12.1/49
Individual/name of organisation Individual
Summary of comments We need a policy that encourages renewable energy installations on existing properties – wind turbines, solar panels etc. Also we need milestones – including all new homes to be zero-carbon by 2016 (see Chancellor's statements 6/12/06)

Ref 68
Ward Old Hastings
Response ref 12.1/50
Individual/name of organisation Individual
Summary of comments Delete "wherever possible" from last bullet point: "incorporating recycling facilities and using waste as a resource"

Ref 102
Ward Old Hastings
Response ref 12.1/51
Individual/name of organisation Individual
Summary of comments Review all housing planning so that they are energy efficient and environmentally efficient

Ref 149
Ward
Response ref 12.1/52
Individual/name of organisation Environment Agency
Summary of comments In this section, the first bullet point refers to 'water pollution', however we feel that this is vague and would prefer it if this was referred to as "surface and ground water quality". Sustaining and improving water quality (including both surface waters and groundwater) can then be taken into account, which in turn will reduce water pollution.

As a minor correction, we also highlight that reference to sustainable urban drainage systems throughout the document should be amended to 'Sustainable Drainage Systems' (SuDS). This is to reflect changes at a national level.

The final bullet point in this section refers to the need for recycling facilities to be incorporated and waste used as a resource wherever possible. Although it is good to see a commitment to change behaviour and attitudes towards waste and for waste to be regarded as a resource, we highlight that the primary emphasis should be to reduce waste growth/arisings. This should be a first and primary measure before recycling and other options for sustainable waste management are considered.

The issue of maintaining biodiversity should also be addressed within this section on sustainability issues. Increased biodiversity and complexity of natural systems increases the stability of the system, enabling it to cope better with impacts. Therefore, we suggest that this is considered as a sustainability issue.

Ref 100
Ward
Response ref 12.1/53
Individual/name of organisation Highways Agency
Summary of comments In respect of air quality in the vicinity of the strategic road network, either within or outside the boundaries of your planning authority, the HA will need to consider whether development within the Local Development Framework (LDF) will cause a compliance problem from 2010, or make an existing forecast compliance problem worse. If this situation arises the HA may also need to consider whether to make representations in respect of the legality of the proposals and the soundness of the LDF.

We suggest that Hastings Borough Council develop a Sustainability Appraisal which should contain evidence as the effect of development in the LDF on air quality, with particular reference to Directive 1999/30. The HA may be able to assist your council with specialist advice on the most appropriate assessment methodology.

Similarly, where the LDF relies on measures on the strategic road network, the HA may not be able to deliver these if the measures, or the development which they were intended to enable, would cause a compliance problem from 2010 or make an existing forecast compliance problem worse. This might apply whether or not the compliance problem in the vicinity of the Strategic Road Network.

Additionally, the HA would request that you consider developing a Sustainability Appraisal with traffic related indicators, which might include (but not be limited to):

- The proportion of trips made by non-car modes;
- The proportion of new development which is meeting its travel plan objectives; and
- The level of growth of traffic on key routes within the Borough.

Ref 142
Ward
Response ref 12.1/54
Individual/name of organisation Forestry Commission
Summary of comments We support inclusion of all the issues identified in the policy approach to Environmental Sustainability, yet we also wish to highlight that use of building materials should be included as part of the design of building. The use of an increased proportion of timber in construction reduces the environmental impact of a building compared to use of steel and concrete. There are a number of flagship public buildings across the region that use local wood with imagination - these include the Woodland Enterprise Centre at Flimwell, the Weald and Downland gridshell building and the recently opened Savill Gardens Visitors Centre at Windsor.

Ref 146
Ward
Response ref 12.1/55
Individual/name of organisation Southern Water
Summary of comments SW support the need for a strategic policy covering the issues described in paragraph 12.6. However the need to protect groundwater & water quality, planning for adequate infrastructure, and reducing the risk of flooding are nor issues solely relating to climate change. We would expect the Core Strategy to include policies to address these key issues in their own right as well as measures to address the impact of climate change.

Ref 154
Ward
Response ref 12.1/56
Individual/name of organisation Planning Potential
Summary of comments The most efficient use of previously developed land is a key consideration. The overall benefits of proposed developments must be taken into account to provide a balanced view

Ref 148
Ward
Response ref 12.1/57
Individual/name of organisation Transport 2000
Summary of comments There are no serious commitments to ‘rebalance transport away from the private car and towards sustainable modes of transport’. We would like to see greater consistency, and much greater efforts to secure a sustainable transport system for Hastings and Bexhill. There must be an agenda for ‘ambitious change’ and not just ‘enlightened business as usual’.

Question 12.2

Sustainable Design:
Should the Council require all new development to meet the minimum level of sustainable construction, for example the Building Research Establishment's 'BREEAM' and 'Eco-homes' standard?

Responses to this question: Total number of responses: 101
Individuals: Total 64
Local Groups: Total 11
Developers: Total 4
Statutory Agencies: Total 9
Other (including anonymous): Total 13

Response percentages: Agree – 93% Disagree – 5% No Opinion – 2%

Question 12.3

Sustainable Design:
Do you have any other comments on whether the Council should require all new development to meet the minimum level of sustainable construction, for example the Building Research Establishment's 'BREEAM' and 'Eco-homes' standard?

Responses to this question: Total number of responses: 49
Individuals: Total 29
Baird (1), Braybrooke (1), Castle (7), Conquest (1), Gensing (1), Maze Hill (1), Old Hastings (1), Ore (1), Silverhill (2), St Helens (1), Tressell (2), West St Leonards (1), Wishing Tree (2), Other (7).

Local Groups: Total 7
Hastings & Rother LA21, Hastings & Rother Urban Design Group, Hastings and Rother Disability Forum, Hastings Environment Network, Hastings Old Town Residents Association, Hastings Urban Bikes, Ore Valley Forum

Developers: Total 2
Wm. Morrison Supermarkets plc, The Mother Agnes Trust

Statutory agencies: Total 4
English Partnerships, Forestry Commission, Southern Water, Sussex Police.

Other (including anonymous): Total 7
1066 Housing Association, Anonymous (4), Home Builders Federation, The Planning Bureau.

Ref 1
Ward
Response ref 12.3/1
Individual/name of organisation Sussex Police
Summary of comments Include statement "The authority supports the police scheme 'Secured by Design'. Planning applications will be expected to demonstrate how crime prevention has been considered and how the principles detailed in 'Safer Places' (ODPM, 2004) have been adhered to"

Ref 2
Ward
Response ref 12.3/2
Individual/name of organisation Individual
Summary of comments BREEAM and 'Eco-homes' Standards should apply to all buildings, not just dwellings – thus including schools, supermarkets, shops, offices, warehouses etc

Ref 3
Ward
Response ref 12.3/3
Individual/name of organisation The Planning Bureau
Summary of comments Depends on type of development.

Ref 9
Ward Baird
Response ref 12.3/4
Individual/name of organisation Individual
Summary of comments Some developers don't seem very keen on this only one developer was left to build the site on Frederick road. What happens if you can't find people to build to 'eco homes' standard?

Ref 13
Ward Castle
Response ref 12.3/5
Individual/name of organisation Individual
Summary of comments This should also include private planning applications and the Council should enforce conditions and materials used.
All hard surfaces laid should enable water to filter through into the ground. Surface water runoff form hard surfaces should be stopped.

Ref 16
Ward
Response ref 12.3/6
Individual/name of organisation Individual
Summary of comments If a genuinely true assessment is achievable I would agree. If, however, the door of opinion is open only a crack I would disagree.

Ref 15
Ward Gensing
Response ref 12.3/7
Individual/name of organisation Individual
Summary of comments BREEAM & EcoHome are no use to those whose premises are already up. But a personalised i.e. address-specific, advisory source related to what is already known about (e.g.) the location and condition of an [illegible word] property would be a welcome signal. That you really-truly-really want to involve and assist the ordinary folk whose active support you will increasingly need.

Ref 32
Ward
Response ref 12.3/8
Individual/name of organisation Hastings Old Town Residents Association
Summary of comments The impact of the new Building Regulations on restoring old properties is too soon to assess. There are concerns about insulation [illegible word] for example. Most traditional wall building techniques did not include insulation but the walls would have been much thicker.

There will be a debate in the life of this policy about the issues. If the new regulations are too onerous then there is the danger that restoration, especially in Conservation Areas, will be too expensive.

Ref 31
Ward
Response ref 12.3/9
Individual/name of organisation Individual
Summary of comments Should we not require developers to meet more than the minimum level? If the town is creating development and regeneration on an unprecedented level we need to ensure it is developed to high levels of sustainability

Ref 82
Ward Castle
Response ref 12.3/10
Individual/name of organisation Individual
Summary of comments The STERN report makes it clear that to maintain economic sustainability in the future we need to act now, even if it means a reduced level of economic activity at present. Will the council take this on board with regard to retail expansion and road building?

Ref 81
Ward Silverhill
Response ref 12.3/11
Individual/name of organisation Individual
Summary of comments Offer incentive scheme for landlords, developers going beyond the minimum level

Ref 134
Ward St Helens
Response ref 12.3/12
Individual/name of organisation Individual
Summary of comments Should be 'excellent' level – we'll regret going for anything less in years to come. It'll be more expensive at first but not in the long run.

Ref 133
Ward
Response ref 12.3/13
Individual/name of organisation Anonymous
Summary of comments Sustainable materials may require re considering existing buildings and fire regulations

Ref 77
Ward
Response ref 12.3/14
Individual/name of organisation Ore Valley Forum
What are the BREEAM and Eco Homes standard? All properties should have renewable energy. Grey water should be recycled to flush toilets. Homes should be built to last 100 years thus saving energy when the poorly built ones have to be pulled down after 35 years and rebuilt.

Ref 132
Ward Ore
Response ref 12.3/15
Individual/name of organisation Individual
Summary of comments Could solar panels be integrated into all new housing? It seems we will be having plenty of sun. Hastings could lead the way in this.

Ref 130
Ward Castle
Response ref 12.3/16
Individual/name of organisation Individual
Summary of comments Require redeveloped old building to include renewable & sustainable technologies as well as new ones.
Make planning consent for solar, thermal/PV and turbines easier.
Encourage neighbours to combine assets to get renewable provision. See www.3acorns.co.uk
This guy has pressed for more of this in South London with some redevelop, Encourage way to water flushing/solar thermal/turbines/allotments etc

Ref 128
Ward
Response ref 12.3/17
Individual/name of organisation Anonymous
Summary of comments Must be good quality.

Ref 106
Ward Castle
Response ref 12.3/18
Individual/name of organisation Individual
Summary of comments Eco-homes yes, I don't know what BREEAM includes

Ref 96
Ward Tressell
Response ref 12.3/19
Individual/name of organisation Individual
Summary of comments Make sure the materials used in new houses area of good quality, brick, tile. The quality should be such as to last 100 years.

Ref 92
Ward Castle
Response ref 12.3/20
Individual/name of organisation Individual
Summary of comments Not enough ……

Ref 93
Ward
Response ref 12.3/21
Individual/name of organisation Individual
Summary of comments Provided this would be economically viable and not stall much needed development.

Ref 86
Ward Braybrooke
Response ref 12.3/22
Individual/name of organisation Individual
Summary of comments No, I think a much higher standard is necessary, BREEAM is very basic and very strict. Time is unfortunately not on our side so we do not have time to start at the weakest and make our way up, we can only make a significant change and difference by setting developers the task of having to meet the highest standards or facing having penalties or fines or even withdraw of contract.

Ref 95
Ward Wishing Tree
Response ref 12.3/22
Individual/name of organisation Individual
Summary of comments As a bar minimum! If we are going to be a really go-ahead town all our new housing should have a minimum carbon footprint, with rainwater recycling, combined heat and power units – in fact every aspect of technology we can use!

Ref 91
Ward West St Leonards
Response ref 12.3/23
Individual/name of organisation Individual
Summary of comments Fit this into a wider design guidance document!

Ref 114
Ward
Response ref 12.3/24
Individual/name of organisation Hastings & Rother LA21
Summary of comments This would be a good starting point as it is clearly the most cost effective way to start to cut CO2. It is regretted that grants for established homes have been dramatically reduced to provide finds for grants for industrial and commercial buildings.

Ref 119
Ward Maze Hill
Response ref 12.3/25
Individual/name of organisation Individual
Summary of comments I believe the council should go further than just the minimum standard if it if to set an example to communities, The minimum should be good or very good. The requirement is to provide underground storage tanks for capturing rainwater for use in the garden, washing cars, paths etc should be included.

Ref 111
Ward
Response ref 12.3/26
Individual/name of organisation Anonymous
Summary of comments Why doesn't Hastings become the first Council to require all window replacements to be environmentally friendly and sustainable. Imagine the rubbish mountain when all those short term plastic windows have to be recycled.

Ref 80
Ward Castle
Response ref 12.3/27
Individual/name of organisation Individual
Summary of comments No, if we are going to make a honest commitment to earlier aspirations laid down in this LDF then we have to go for the maximum level of sustainable construction to include flat pack and portable construction

Ref 107
Ward
Response ref 12.3/28
Individual/name of organisation Anonymous
Summary of comments We should use the highest standards. British developers have historically used the cheapest design not the most sustainable design.

Ref 105
Ward
Response ref 12.3/29
Individual/name of organisation Hastings Environment Network
Summary of comments BREEAM standards is not high enough

Ref 76
Ward Tressell
Response ref 12.3/30
Individual/name of organisation Individual
Summary of comments Yes, of course, if we care about our children's future, and their future of this town.

Ref 123
Ward
Response ref 12.3/31
Individual/name of organisation Individual
Summary of comments At least the minimum, HBC needs to ensure standards are at their highest.

Ref 108
Ward
Response ref 12.3/32
Individual/name of organisation Hastings and Rother Disability Forum
Summary of comments We should look to the future and design buildings that will last to the future. Therefore we should take a lead in this and look at how things are happening on the continent.

Ref 122
Ward
Response ref 12.3/33
Individual/name of organisation Hastings & Rother Urban Design Group
Summary of comments All dev should meet the minimum but incentives should be devised so that the minimum is exceeded,

Ref 126
Ward
Response ref 12.3/34
Individual/name of organisation Hastings Urban Bikes
Summary of comments All new development at public buildings should include
1. secure cycle parking
2. secure cycle lockers
3. showers and changing facilities for cyclists and walkers
4. free charging points for electric bikes

Ref 58
Ward
Response ref 12.3/35
Individual/name of organisation Individual
Summary of comments The Hastings/Bexhill Link Road with increased distances travelled conflicts with addressing the causes and impacts of climate change stated. Will also notably increase the risk of flooding – how will this affect Bulverhythe?

Para 12.13 states: "Although design and build costs are usually higher for energy efficient buildings, such costs can be compensated for by lower running costs…" What figures are available? How many years before we are repaid?

Ref 29
Ward
Response ref 12.3/36
Individual/name of organisation Home Builders Federation
Summary of comments Additional costs are involved for developers to reach significantly higher levels of energy efficiency in relation to building design. The maintenance of photo voltaic cells limits their appeal to homeowners at present.. For the mass of the home buying market, the costs of energy efficient design do not readily transfer to increased sale prices in most cases. This will hopefully change as consumers wake up to their environmental responsibilities as the cost of utilities rise. The HBF consider that the efficiency of new development should be directed by the industry and through other arms of government policy. In any case most leading developers already build to at least the minimum levels of the BRE EcoHomes assessment.

Ref 30
Ward Conquest
Response ref 12.3/37
Individual/name of organisation Individual
Summary of comments It's a start, but not really good enough. We should be going for zero CO2 standard.

Ref 61
Ward Castle
Response ref 12.3/38
Individual/name of organisation Individual
Summary of comments Agree, unless there is a more stringent standard. If so this should be followed.

Ref 63
Ward Silverhill
Response ref 12.3/39
Individual/name of organisation Individual
Summary of comments Assume this would include lavatories with dual flush, minimal water, greater water capacity.
More [illegible word] to be encouraged for limits on domestic use, that it becomes acceptable not to flush loos each time of use, or use a jug of water. More recognition that 100 flushings misuses more water than other activities. Repair leaks in water grid.

Ref 65
Ward
Response ref 12.3/40
Individual/name of organisation English Partnerships
Summary of comments Yes, but need to ask which level – suggest "very good"

Ref 66
Ward Wishing Tree
Response ref 12.3/41
Individual/name of organisation Individual
Summary of comments Energy conservation should be administered through the Building Regulations. The standards should be nationally agreed

Ref 67
Ward
Response ref 12.3/42
Individual/name of organisation Individual
Summary of comments At least eco-homes very good. Policy on insulation, energy efficiency, water efficiency, are required. Also one boiler for five flats. We need a policy on using recycled building materials.

Ref 68
Ward Old Hastings
Response ref 12.3/43
Individual/name of organisation Individual
Summary of comments The Council should aim for "very good" or "excellent" for all new development. Where major refurbishments are proposed for existing properties there should be an assessment for environmental sustainability and a programme of upgrading to meet these standards.

Ref 147
Ward
Response ref 12.3/44
Individual/name of organisation The Mother Agnes Trust
Summary of comments Places a burden on development in a location where growth and regeneration are imperative, and where viability is finely balanced.

Ref 153
Ward
Response ref 12.3/45
Individual/name of organisation Wm. Morrison Supermarkets plc
Summary of comments Our client considers that conformity with national guidance is important. National Policy for renewable energy is set out in PPS22, and at paragraph 8 it states that Local Planning Authorities may include policies in Local Development Documents, which require a percentage of the energy to be used in new development to come from on site renewable energy developments. It is however, subject to a caveat that it should only be applied to developments where the installation of such equipment is viable and should not place an undue burden on developers.

Any policies on energy efficiency and sustainable construction measures should therefore clearly recognise the advice in PPS22, should retain sufficient flexibility and should not place unduly onerous requirements on developers.

Ref 157
Ward
Response ref 12.3/46
Individual/name of organisation 1066 Housing Association
Summary of comments We would want the standard set at 'good', excellent may not be achievable.

Ref 142
Ward
Response ref 12.3/47
Individual/name of organisation Forestry Commission
Summary of comments If Hastings is to be serious about its environmental credentials then it should require all new development to reach at least BREEAM/ EcoHomes 'Very good' level. As useful comparisons, SEEDA funded developments have to reach the 'Excellent' level. The Ashford Core Strategy Submission Draft also takes a pragmatic stepwise approach to adoption of these standards across its development.

Ref 146
Ward
Response ref 12.3/48
Individual/name of organisation Southern Water
Summary of comments Efficient use of water is important at a time when the demand for water is rising both as a result of population growth and increased per capita consumption.
Prudent use of water resources is a key component of sustainable development. The draft SE Plan promotes the BREEAM method to assess the environmental performance of new development. If HBC adopts this method, specific standards should be promoted relating to water use in order to ensure implementation. BRE's Ecohomes assessment makes six credits available on internal ^ external water use. We propose that at least 4 out of 6 credits should be achieved in new homes. A similar standard would be appropriate for commercial development

Question 12.4

Renewable energy:
Should we require developers to submit an assessment of a development's energy demand and require that at least 10% of this demand is supplied from on site renewable energy?

Responses to this question: Total number of responses: 105
Individuals: Total 65
Local Groups: Total 12
Developers: Total 4
Statutory Agencies: Total 9
Other (including anonymous): Total 15

Response percentages: Agree – 80% Disagree – 15% No Opinion – 5%

Question 12.5

Renewable energy:
Do you have any other comments on whether we should require developers to submit an assessment of a development's energy demand and require that at least 10% of this demand is supplied from on site renewable energy?

Responses to this question: Total number of responses: 48
Individuals: Total 31
Baird (1), Braybrooke (3), Castle (8), Conquest (2), Gensing (1), Maze Hill (1), Old Hastings (2), Ore (1), Silverhill (1), St Helens (2), Tressell (2), Wishing Tree (1), Other (6).

Local Groups: Total 4
Ore Valley Forum; Hastings & Rother LA21; Hastings Democratic Alliance; Hastings & Rother Urban Design Group;

Developers: Total 3
The Planning Bureau; RPS Planning on behalf of Fairview New Homes; The Mother Agnes Trust

Statutory agencies: Total 2
English Partnerships; Forestry Commission;

Other (including anonymous): Total 8
Home Builders Federation; Anonymous (7)

Ref 3
Ward
Response ref 12.5/1
Individual/name of organisation The Planning Bureau
Summary of comments Depends on the type of development.

Ref 5
Ward Conquest
Response ref 12.5/2
Individual/name of organisation Individual
Summary of comments Depends whether this is possible in reality, i.e. if its not ugly looking mini-turbines etc

Ref 13
Ward Castle
Response ref 12.5/3
Individual/name of organisation Individual
Summary of comments This is the whole point of the image for the future of Hastings

Ref 14
Ward
Response ref 12.5/4
Individual/name of organisation Anonymous
Summary of comments How can you control this when energy companies currently only use 4% renewables (EDF Energy)

Ref 15
Ward Gensing
Response ref 12.5/5
Individual/name of organisation Individual
Summary of comments It's a great idea, but the market is just not ready for it and hassle averse developers will simply relocate to (e.g.) Eastbourne

Ref 17
Ward Braybrooke
Response ref 12.5/6
Individual/name of organisation Individual
Summary of comments We need to encourage first, but then require!

Ref 18
Ward Baird
Response ref 12.5/7
Individual/name of organisation Individual
Summary of comments How are we going to meet these targets 12.4 if we are going to build more and more houses increasing our population, more jobs more travelling more energy us, more emissions and so it goes round?!

Ref 33
Ward
Response ref 12.5/8
Individual/name of organisation Anonymous
Summary of comments Absolutely!

Ref 27
Ward Tressell
Response ref 12.5/9
Individual/name of organisation Individual
Summary of comments I agree but we must ensure that enough affordable homes are build because of the crisis that many families, individuals have in finding and affording a place to live

Ref 31
Ward
Response ref 12.5/10
Individual/name of organisation Individual
Summary of comments Some local authorities are putting the level at 15%

Ref 82
Ward Castle
Response ref 12.5/11
Individual/name of organisation Individual
Summary of comments All major developments such as the Station Plaza should include provision for a major investment in alternative energy plans as above. Will this happen? The aforementioned initiatives should be a matter of course!

Ref 81
Ward Silverhill
Response ref 12.5/12
Individual/name of organisation Individual
Summary of comments Is 10% too low?

Ref 134
Ward St Helens
Response ref 12.5/13
Individual/name of organisation Individual
Summary of comments At least ‘at least 10%’

Ref 133
Ward
Response ref 12.5/14
Individual/name of organisation Anonymous
Summary of comments 10% is too low a requirement. Support and assistance should be available for every household

Ref 131
Ward St Helens
Response ref 12.5/15
Individual/name of organisation Individual
Summary of comments This plan sounds good but would only make the properties too costly for the average buyer.

Ref 77
Ward
Response ref 12.5/16
Individual/name of organisation Ore Valley Forum
Summary of comments If we can power one light bulb each from the renewable energy, that may encourage people to turn lights out – encourage them to think of it as free energy.

Ref 132
Ward Ore
Response ref 12.5/17
Individual/name of organisation Individual
Summary of comments Flood-lit sports pitches cause light pollution. Is this legal? People who do not re-cycle should be fined. Water meters should be mandatory. Fines for dog-fouling and littering should be stringently enforced. Could solar panels be integrated into all new housing? It seems we will be having plenty of sun. Hastings could lead the way in this.

Ref 130
Ward Castle
Response ref 12.5/18
Individual/name of organisation Individual
Summary of comments At the very least 10%, New build can realistically aim for thermal hearting and cooling (illegible word). Hastings has more sun and wind than many places – use it!

Ref 36
Ward Maze Hill
Response ref 12.5/19
Individual/name of organisation Individual
Summary of comments Renewable energy schemes should be subject to a cost-benefit analysis. This would prevent “feel-good” but pointless schemes such as wind turbines in low-wind areas. The council would then be in a better position to encourage the most beneficial schemes

Ref 128
Ward
Response ref 12.5/20
Individual/name of organisation Anonymous
Summary of comments But waterpower through larger pipelines is only strong enough to power turbines with steep gradients you could have 2000 generators powered by the water from the north to the south. It wont spoil the scenery with windmills on our hills.

Ref 106
Ward Castle
Response ref 12.5/21
Individual/name of organisation Individual
Summary of comments Make Hastings the pioneer in this field. Visit Rotterdam and see how they use waste to heat the town

Ref 88
Ward Castle
Response ref 12.5/22
Individual/name of organisation Individual
Summary of comments This should be greater than 10%

Ref 93
Ward
Response ref 12.5/23
Individual/name of organisation Individual
Summary of comments Provided this would be economically viable and not stall much needed development.

Ref 86
Ward Braybrooke
Response ref 12.5/24
Individual/name of organisation Individual
Summary of comments Only it should be far higher than 10%. 10% is a pitiful target, these kinds of gestures will do nothing for the environment, well at least not enough to make an impact and create a change.

Ref 116
Ward Old Hastings
Response ref 12.5/25
Individual/name of organisation Individual
Summary of comments I understand that it is easier to get planning permissions to install a satellite dish than it is for a wind turbine which for the average house is comparable in size to a satellite dish. More help/encouragement, planning laws relaxed to allow installation of the relatively unimposing domestic turbines, likewise solar panels should also be encouraged, not just on new homes. What proportion of the towns energy could be generated with its own wave generator, located close to lighthouse, surplus energy sold back to national grid. Micro wave energy should be encouraged in old & existing homes as well as new developments.

Ref 85
Ward
Response ref 12.5/26
Individual/name of organisation Anonymous
Summary of comments Develop off shore wind with Rother for the district. Small scale wind power not effective enough.

Ref 114
Ward
Response ref 12.5/27
Individual/name of organisation Hastings & Rother LA21
Summary of comments In cases where this is not possible a contribution to a fund for schemes elsewhere should be required.

Ref 90
Ward Castle
Response ref 12.5/28
Individual/name of organisation Individual
Summary of comments I'd like to know how realistic/achievable this 10% is - could/should the % be much higher?

Ref 111
Ward
Response ref 12.5/29
Individual/name of organisation Anonymous
Summary of comments The cost may work against this – these things do not come cheap.

Ref 80
Ward Castle
Response ref 12.5/30
Individual/name of organisation Individual
Summary of comments But there again 10% is not enough

Ref 107
Ward
Response ref 12.5/31
Individual/name of organisation Anonymous
Summary of comments Developers should use the highest energy saving designs.

Ref 137
Ward
Response ref 12.5/31
Individual/name of organisation Hastings Democratic Alliance
Summary of comments But more

Ref 123
Ward
Response ref 12.5/32
Individual/name of organisation Individual
Summary of comments Require is the only way to ensure progress.

Ref 48
Ward
Response ref 12.5/33
Individual/name of organisation Individual
Summary of comments The current technology is expensive and not very efficient. Unfortunately it will be required but not yet!

Ref 122
Ward
Response ref 12.5/34
Individual/name of organisation Hastings & Rother Urban Design Group
Summary of comments The minimum 10% baseline is good starting point but a higher % is needed to make a significant difference – maybe the baseline could be raised by 2% year on year until optimum level is reached?

Ref 54
Ward Tressell
Response ref 12.5/35
Individual/name of organisation Individual
Summary of comments Lets be seen as up & coming town on green issues, lets show the way so that others might follow

Ref 29
Ward
Response ref 12.5/36
Individual/name of organisation Home Builders Federation
Summary of comments The HBF consider that there needs to be a flexible approach to the inclusion of renewables on a site-by-site basis. Some housing sites will not lend themselves to the economic or practical inclusion of for example wind turbines due to the relief of the site or surrounding tree cover. If a policy for 10% on-site renewables were to be introduced, developers should have the opportunity to meet the requirements in the most affordable and practical way as possible, given the range of technologies currently available to them.

HBF is concerned that new housing sites should not be viewed in isolation from surrounding communities and existing housing in terms of energy requirements. The use of community based renewable energy schemes may in cases be the most appropriate and economical way forward. There could be potential for developers where appropriate to make commuted payments towards community schemes which have the potential to benefit existing as well as new housing.

HBF believe it is the responsibility of the planning authority to identify all potential opportunities available in a given location for community based renewable energy schemes and combined heat and power schemes in larger commercial developments.
Energy efficiency of new dwellings is the concern of building regulations, and for their progressive upgrading over time – there is concern that having building regulations and Local Development Framework policies on energy efficiency will cause confusion and duplication.
HBF does not object to the fundamental thrust of renewable energy policies but point out the following negative implication of prescriptive policies –
inconsistency between Councils – requiring different percentages across the South East

Ref 30
Ward Conquest
Response ref 12.5/37
Individual/name of organisation Individual
Summary of comments 10% is a start, but again not really good enough. We ought to establish as policy a periodic increase in the % e.g. 1% per annum. By 2016 total % would be 20

Ref 61
Ward Castle
Response ref 12.5/38
Individual/name of organisation Individual
Summary of comments How about 20%. A stretching target could bring some interesting ideas and perhaps stimulate some new local businesses.

Ref 65
Ward
Response ref 12.5/39
Individual/name of organisation English Partnerships
It may be that “encourage” (see our answer below) is better with a view to it becoming a requirement

Ref 66
Ward Wishing Tree
Response ref 12.5/40
Individual/name of organisation Individual
Summary of comments Renewable energy should be encouraged but not made a requirement. At present it is generally expensive and residents may prefer to spend their limited income on other things. Making RE a requirement will put up the cost of housing. Money may be better spent on other improvements to infrastructure

Ref 53
Ward Braybrooke
Response ref 12.5/41
Individual/name of organisation Individual
Summary of comments If practicable – not competent to decide.

Ref 67
Ward
Response ref 12.5/42
Individual/name of organisation Individual
Summary of comments We need to develop a mechanism to monitor and enforce this

Ref 69
Ward
Response ref 12.5/43
Individual/name of organisation Individual
Summary of comments But with clauses that allow an ‘encourage’ where require could lead to a loss of development detrimental to the development of Hastings as a whole

Ref 68
Ward Old Hastings
Response ref 12.5/44
Individual/name of organisation Individual
Summary of comments “Require” not “encourage” maximum on-site renewable energy options required with 10% the absolute minimum for a scheme to be considered for approval

Ref 147
Ward
Response ref 12.5/45
Individual/name of organisation The Mother Agnes Trust
Summary of comments Places a burden on development in a location where growth and regeneration are imperative, and where viability is finely balanced.

Ref 150
Ward
Response ref 12.5/46
Individual/name of organisation RPS Planning on Behalf of Fairview New Homes Ltd
Summary of comments FNH object, whilst it is right & proper that energy & sustainable issues are considered, they should not stifle regeneration & dev. In the case of many, it has yet to be demonstrated that end purchasers pay higher prices for them. Such initiatives are often a cost to the developer. This is not yet reflected in land purchase prices and will take some time for these economics to filter through the process. Specific requirements may make some schemes unviable and as a consequence important housing schemes may not come forward to be developed. Where difficult sites are being regenerated and the costs are significant, other issues may be more important to reduce, e.g. contamination cleanups and AH. Sustainability & renewable energy requirements should be considered on a site by site basis.

Ref 142
Ward
Response ref 12.5/47
Individual/name of organisation Forestry Commission
Summary of comments This approach has been taken by a number of local plans and local development frameworks – notably Merton. Also in Bracknell Forest's Core Strategy submission draft is requiring 10% for small developments and 20% for developments of over 5 dwellings or 500 square metres.

Question 12.6

Or should we 'encourage' rather than 'require' developers to submit an assessment of a development's energy demand and require that at least 10% of this demand is supplied from on site renewable energy?

Responses to this question: Total number of responses: 83
Individuals: Total 55
Local Groups: Total 10
Developers: Total 2
Statutory Agencies: Total 7
Other (including anonymous): Total 9

Response percentages: Agree – 23% Disagree – 73% No Opinion – 4%

Question 12.7

Please tell us any comments you have on whether we should 'encourage' rather than 'require' developers to submit an assessment of a development's energy demand and require that at least 10% of this demand is supplied from on site renewable energy?

Responses to this question: Total number of responses: 25
Individuals: Total 18
Baird (1), Gensing (1), Castle (6), Ore (1), Tressell (2), Braybrooke (3), Old Hastings (2), Conquest (1), Other (1)

Local Groups: Total 3
Ore Valley Forum; Hastings & Rother LA21; Hastings & Rother Urban Design Group;

Developers: Total 1
The Mother Agnes Trust

Statutory agencies: Total 1
Forestry Commission

Other (including anonymous): Total 2
Anonymous (2)

ref 9
Ward Baird
Response ref 12.7/1
Individual/name of organisation Individual
Summary of comments Global warming is coming sooner or later. If we do nothing to save energy it will come sooner and will be too late. Developers must act now.

ref 15
Ward Gensing
Response ref 12.7/2
Individual/name of organisation Individual
Summary of comments Much of what you offer above conflicts with Conservation Area needs, and for the sake of the Bigger Picture conservation must take precedence. Nonetheless a lot more can be than is being done. And one widespread but little-remarked biomass is LOGS. Our hinterland is well able to sustain this.

ref 82
Ward Castle
Response ref 12.7/3
Individual/name of organisation Individual
Summary of comments Recycling – to help minimise waste there should be strict controls on companies with taxes on packaging and goods that are not made to last

ref 77
Ward
Response ref 12.7/4
Individual/name of organisation Ore Valley Forum
Summary of comments Only doing with slow global warming

ref 132
Ward Ore
Response ref 12.7/5
Individual/name of organisation Individual
Summary of comments Costs would go up and the renewable energy improvements revisited by developers. Renewable energy should be statutory.

ref 130
Ward Castle
Response ref 12.7/6
Individual/name of organisation Individual
Summary of comments I love choice, but it has become a luxury we cannot afford.

ref 106
Ward Castle
Response ref 12.7/7
Individual/name of organisation Individual
Summary of comments Encouragement probably isn't enough. Most of us are selfish

ref 84
Ward Tressell
Response ref 12.7/8
Individual/name of organisation Individual
Summary of comments Unless it is a requirement it will not happen

ref 92
Ward Castle
Response ref 12.7/9
Individual/name of organisation Individual
Summary of comments The issues are far too important to be left to encouragement.

ref 86
Ward Braybrooke
Response ref 12.7/10
Individual/name of organisation Individual
Summary of comments It should be a requirement I would rather have fewer houses and development abiding by high eco and environmental standards

ref 97
Ward
Response ref 12.7/11
Individual/name of organisation Individual
Summary of comments The problems of pollution are so great that we are past the "encourage" stage.

ref 114
Ward
Response ref 12.7/12
Individual/name of organisation Hastings & Rother LA21
Summary of comments Whilst it would clearly be better if the same result should be obtained by encouraging rather than requiring this almost certainly would not happen, encouraging use of renewable's via the planning process have failed in the past re: new station building

ref 90
Ward Castle
Response ref 12.7/13
Individual/name of organisation Individual
Summary of comments Would much more than 10% not be possible? Why limit the possibilities? – and what about rainwater use and environmentally friendly waste disposal and recycling

ref 111
Ward
Response ref 12.7/14
Individual/name of organisation Anonymous
Summary of comments We must take on board European standards of energy saving and recycling. Germans and Swedes are appalled at the antiquated approach in the UK. Why doesn't Hastings show the way?

ref 107
Ward
Response ref 12.7/15
Individual/name of organisation Anonymous
Summary of comments We should require

ref 45
Ward Braybrooke
Response ref 12.7/16
Individual/name of organisation Individual
Summary of comments No point in 'encouraging' as developers (perhaps understandably) always look to maximise their profit.

ref 122
Ward
Response ref 12.7/17
Individual/name of organisation Hastings & Rother Urban Design Group
Summary of comments If it's not a requirement a lot of developers will avoid the issue

ref 104
Ward Old Hastings
Response ref 12.7/18
Individual/name of organisation Individual
Summary of comments As not currently working – refer to local recycling as an example. We must address these issues now in order to save our planet

ref 54
Ward Tressell
Response ref 12.7/19
Individual/name of organisation Individual
Summary of comments Property builders/developer area only in it for the money essentially, therefore a requirement is necessary or it may not happen at all.

ref 30
Ward Conquest
Response ref 12.7/20
Individual/name of organisation Individual
Summary of comments Developers generally will not do this without direction to do so except perhaps in high value areas i.e. not Hastings

ref 61
Ward Castle
Response ref 12.7/21
Individual/name of organisation Individual
Summary of comments No. If you only “encourage” nothing will happen, as usual.

ref 53
Ward Braybrooke
Response ref 12.7/22
Individual/name of organisation Individual
Summary of comments Perhaps encourage is preferable, but results must be continuously monitored to see results.

ref 68
Ward Old Hastings
Response ref 12.7/23
Individual/name of organisation Individual
Summary of comments The Borough Plan already has Policy DG23 and DG24. The “encouragement” within these policies has not been effective.

ref 147
Ward
Response ref 12.7/24
Individual/name of organisation The Mother Agnes Trust
Summary of comments Places a burden on development in a location where growth and regeneration are imperative, and where viability is finely balanced.

ref 142
Ward
Response ref 12.7/25
Individual/name of organisation Forestry Commission
Summary of comments A statement by Yvette Cooper, Minister for Housing and Planning on 6th June 2006 states that “the Government expect all planning authorities to include policies in their development plans that require a percentage of the energy in new developments to come from on-site renewables, where it is viable

Question 12.8

Renewable energy:
(a) Should the suggested requirement (for developers to submit an assessment of a development's energy demand and that at least 10% of this demand is supplied from on site renewable energy) relate only to housing schemes of 10 or more dwellings and commercial schemes of over 1000msq?

Responses to this question: Total number of responses: 63
Individuals: Total 42
Local Groups: Total 8
Developers: Total 3
Statutory Agencies: Total 3
Other (including anonymous): Total 7

Response percentages: Agree – 21% Disagree – 68% No Opinion – 11%

Question 12.8

Renewable energy:
(b) Should the suggested requirement (for developers to submit an assessment of a development's energy demand and that at least 10% of this demand is supplied from on site renewable energy) relate to all developments?

Responses to this question: Total number of responses: 89
Individuals: Total 56
Local Groups: Total 11
Developers: Total 3
Statutory Agencies: Total 8
Other (including anonymous): Total 11

Response percentages: Agree – 85% Disagree – 9% No Opinion – 6%

Question 12.9

Renewable energy:
Please tell us any other comments you have on whether the suggested requirement (for developers to submit an assessment of a development's energy demand and that at least 10% of this demand is supplied from on site renewable energy) should relate to: (a) only to housing schemes of 10 or more dwellings and commercial schemes of over 1000sqm, or (b) should it relate to all developments?

Responses to this question: Total number of responses: 21
Individuals: Total 13
Conquest (2), Gensing (1), Castle (3), Old Hastings (3), Braybrooke (2), Tressell (1), Other (1)

Local Groups: Total 4
Hastings Old Town Residents Association; Ore Valley Forum; Hastings & Rother LA21; Hastings & Rother Urban Design Group

Developers: Total 1
The Mother Agnes Trust

Statutory agencies: Total 1
Forestry Commission

Other (including anonymous):Total 2
Home Builders Federation; Anonymous (1)

ref 5
Ward Conquest
Response ref 12.9/1
Individual/name of organisation Individual
Summary of comments As in 12.5, if possible in reality.

ref 15
Ward Gensing
Response ref 12.9/2
Individual/name of organisation Individual
Summary of comments If it's a requirement you'll only get away with it among those who cannot move out; if it's a (strong) recommendation, throw it at everyone.

ref 32
Ward
Response ref 12.9/3
Individual/name of organisation Hastings Old Town Residents Association
Summary of comments Any commercial scheme in receipt of "public funds" should comply.

ref 82
Ward Castle
Response ref 12.9/4
Individual/name of organisation Individual
Summary of comments We cannot ignore the consequences of not dealing with climate change. Make this town a showcase for the rest of the country! Hastings is one of the towns most at risk!

ref 77
Ward
Response ref 12.9/5
Individual/name of organisation Ore Valley Forum
Summary of comments All new houses should have micro wind turbines, photovoltaic and thermal panels plus grey water recycling. We need to reduce the carbon footprint and the measures will do that now and for years to come.

ref 130
Ward Castle
Response ref 12.9/6
Individual/name of organisation Individual
Summary of comments Must be per dwelling, no exceptions. Having said that, larger developments could have fewer, larger turbines rather than many small ones.

ref 125
Ward Old Hastings
Response ref 12.9/7
Individual/name of organisation Individual
Summary of comments Hastings/Bexhill is on the global warming 'front' – so lets get real in our own backyard!

ref 97
Ward
Response ref 12.9/8
Individual/name of organisation Individual
Summary of comments As at 12.7. There is no room for exemption unless it can be shown that the entire costs for 10 or less dwellings outweighs the potential savings.

ref 114
Ward
Response ref 12.9/9
Individual/name of organisation Hastings & Rother LA21
Summary of comments Given the increasing sacristy of larger sites for development to many would be excluded by 12.8a

ref 90
Ward Castle
Response ref 12.9/10
Individual/name of organisation Individual
Summary of comments Don't know

ref 111
Ward
Response ref 12.9/11
Individual/name of organisation Anonymous
Summary of comments As long as it is not used as another excuse to pull down old buildings and erect mediocre new ones.

ref 45
Ward Braybrooke
Response ref 12.9/12
Individual/name of organisation Individual
Summary of comments Don't want to discourage small scale redevelopment or in-filling.

ref 122
Ward
Response ref 12.9/13
Individual/name of organisation Hastings & Rother Urban Design Group
Summary of comments It should apply to all building types/sizes of dev – thought should be given to encouraging retro-fit on existing properties undergoing change/extension.

ref 54
Ward Tressell
Response ref 12.9/14
Individual/name of organisation Individual
Summary of comments Lets set long term view standards and stick to them if we don't buck up our ideas on looking after our environment, we might not have one to look after, lets live for our and our children's future not just momentary fleeting selfish pleasures.

ref 124
Ward Old Hastings
Response ref 12.9/15
Individual/name of organisation Individual
Summary of comments The % should be higher for public – say 30-40% possibly.

ref 30
Ward Conquest
Response ref 12.9/16
Individual/name of organisation Individual
Summary of comments It is a large series of small changes to the built environment that will make a difference (to quality) rather than a small series of large changes.

ref 29
Ward
Response ref 12.9/17
Individual/name of organisation Home Builders Federation
Summary of comments Any renewable energy policy should not prescribe a blanket application or arbitrary target over and above the requirement of 10% renewable energy on schemes of 10 houses or more (SEP) target

ref 53
Ward Braybrooke
Response ref 12.9/18
Individual/name of organisation Individual
Summary of comments Should not leave any out.

ref 68
Ward Old Hastings
Response ref 12.9/19
Individual/name of organisation Individual
Summary of comments The same rule for all is far more effective and easier to apply

ref 147
Ward
Response ref 12.9/20
Individual/name of organisation The Mother Agnes Trust
Summary of comments Places a burden on development in a location where growth and regeneration are imperative, and where viability is finely balanced.

ref 142
Ward
Response ref 12.9/21
Individual/name of organisation Forestry Commission
Summary of comments If you wish to consider a higher percentage then there should be a threshold. You may wish to note that other councils, such as Bracknell Forest (currently at submission stage of the LDF Core Strategy) are planning to require up to 20% in larger developments, with 10% for smaller development.

Question 12.10

Should we identify sites/opportunities for renewable energy schemes?

Responses to this question: Total number of responses: 88
Individuals: Total 58
Local Groups: Total 9
Developers: Total 3
Statutory Agencies: Total 6
Other (including anonymous): Total 12

Response percentages: Agree – 83% Disagree – 8% No Opinion – 9%

Question 12.11

Please tell us any comments you have on whether we should identify sites/opportunities for renewable energy schemes?

Responses to this question: Total number of responses: 37
Individuals: Total 29
Conquest (2), Gensing (1), Baird (1), Central St Leonards (2), Tressell (3), Castle (4), Old Hastings (5), Maze Hill (1), Braybrooke (3), Wishing Tree (2), Other (5)

Local Groups: Total 4
Ore Valley Forum; Hastings & Rother LA21; Hastings & Rother Urban Design Group; Hastings Urban Bikes

Developers: Total 1
The Mother Agnes Trust

Statutory agencies: Total 1
Forestry Commission.

Other (including anonymous): Total 2
Anonymous (2).

ref 2
Ward
Response ref 12.11/1
Individual/name of organisation Individual
Summary of comments In relation to flood risk – There is no justification for building in an area where the risk of flooding is 1 in 75 or greater, whatever the pressures or absence of alternatives

ref 5
Ward Conquest
Response ref 12.11/2
Individual/name of organisation Individual
Summary of comments If the area is not made into an ugly no-go place. Could possibly make a feature of it instead, looks good and interesting, especially for the younger generation.

ref 15
Ward Gensing
Response ref 12.11/3
Individual/name of organisation Individual
Summary of comments Many “renewable energy schemes” are in fact clothed in mythology. If this could be stripped away individuals might then their own informed choice – as they largely have, for instance, with low-energy lightbulbs. That changeover was virtually painless.

ref 18
Ward Baird
Response ref 12.11/4
Individual/name of organisation Individual
Summary of comments The flood policy is laughable if it wasn’t so serious. How do you think you can keep the sea back? Neptune tried it! For instance the idiotic plan to build a hotel on the beach!

ref 33
Ward
Response ref 12.11/5
Individual/name of organisation Anonymous
Summary of comments As a highly skilled postgraduate who is currently unemployed I do think that the lack of job opportunities here is serious and that people like me could decide to move away solely for this reason. I love living here. I think the town has a fantastic amount to offer but I look at the job adverts and the low salaries with increasing gloom.

ref 35
Ward Central St Leonards
Response ref 12.11/6
Individual/name of organisation Individual
Summary of comments All renewable energies should be decentralised and built into all new proposed buildings and implemented into far as possible all existing buildings.
Further residents of Hastings should be encouraged to use less energy through promotional literature and the Council should see through, such as no essential street lighting and retail units that leave lights on day and night.

ref 27
Ward Tressell
Response ref 12.11/7
Individual/name of organisation Individual
Summary of comments Having completed this form I would like to state that I realise the complex nature of all the issues. (As I already knew before completing this form). The town needs radical regeneration starting with (1) decent homes, (2) good jobs, career paths, (3) public transport that works, (4) action not words

ref 47
Ward Tressell
Response ref 12.11/8
Individual/name of organisation Individual
Summary of comments Generally speaking this all sounds wonderful – but whose going to pay for it?

ref 31
Ward
Response ref 12.11/9
Individual/name of organisation Individual
Summary of comments Could also include micro generation and combined heat and power schemes (CHP)

ref 82
Ward Castle
Response ref 12.11/10
Individual/name of organisation Individual
Summary of comments Tidal – Bulverhythe?; Renewable energy/technology centre – Pebsham?

ref 135
Ward Old Hastings
Response ref 12.11/11
Individual/name of organisation Individual
Summary of comments How about one of the new breed of incinerators instead of dumping rubbish in a hole in the ground which give off toxic gases

ref 77
Ward
Response ref 12.11/12
Individual/name of organisation Ore Valley Forum
Summary of comments All new developments should include this as every little helps and would hopefully remind the householder that energy efficiency is vital

ref 130
Ward Castle
Response ref 12.11/13
Individual/name of organisation Individual
Summary of comments A wind farm up on the Pebsham landfill, or the top of Bos field, the top of William Parker grounds, above the castle, perhaps. Waste management – compost & recycle – encourage re-use and reduction (including discouraging business from tough use of packaging) Refuse to accept incinerators as 'recycling' and ban burning plastics. DO NOT waste resources on nonviable things like the much (illegible word) biofuels & hydrogen economy.

ref 36
Ward Maze Hill
Response ref 12.11/14
Individual/name of organisation Individual
Summary of comments Before mandating a particular scheme, the council should determine whether the best results would be obtained by a larger number of small power sources, e.g. solar panels on each roof, or by a larger renewable power scheme for the whole development

ref 125
Ward Old Hastings
Response ref 12.11/15
Individual/name of organisation Individual
Summary of comments Wind power on the Pier and the Front

ref 117
Ward Central St Leonards
Response ref 12.11/16
Individual/name of organisation Individual
Summary of comments Not sure about the changing image. Hastings is a back water. Some of us like it as it is.

ref 106
Ward Castle
Response ref 12.11/17
Individual/name of organisation Individual
Summary of comments It is impossible to tell what effect one improvement may have on another area. In Selsey there was a wonderful scheme put in place for flood defence which gave rise to the flooding of Bracklesham Bay

ref 86
Ward Braybrooke
Response ref 12.11/18
Individual/name of organisation Individual
Summary of comments These sites should be existing brown field that can be re-used or modified for a different purpose.

ref 95
Ward Wishing Tree
Response ref 12.11/19
Individual/name of organisation Individual
Summary of comments All sites.

ref 116
Ward Old Hastings
Response ref 12.11/20
Individual/name of organisation Individual
Summary of comments New housing developments in the flood plain area should be designed to survive potential flooding particularly if properties area located on the seafront adjacent to the railway at Bulverhythe. I notice that many apartment buildings in Sovereign Harbour are effectively built on concrete stilts allowing car parking at ground level but under the building. Bolder defences at Bulverhythe developing these into the housing schemes to provide jetties and mooring facilities. Bolder defences at Bulverhythe.

ref 85
Ward
Response ref 12.11/21
Individual/name of organisation Anonymous
Summary of comments Take example from Brighton and Hove new developments to produce a model of good practice in Hastings.

ref 97
Ward
Response ref 12.11/22
Individual/name of organisation Individual
Summary of comments We must be seen to address this important issue even if at the end of the day the opportunities are found not to capable of realisation.

ref 114
Ward
Response ref 12.11/23
Individual/name of organisation Hastings & Rother LA21
Summary of comments In cases were this is not possible a contribution to a fund for schemes elsewhere should be required.

ref 90
Ward Castle
Response ref 12.11/24
Individual/name of organisation Individual
Summary of comments Could we not encourage/support/fund schemes for existing buildings as well as new ones?

ref 110
Ward Braybrooke
Response ref 12.11/25
Individual/name of organisation Individual
Summary of comments Eco home excellent & good are now insufficient standards and should be higher requirement to ensure 10% renewable in new build & high water conservation & energy is met

ref 76
Ward Tressell
Response ref 12.11/26
Individual/name of organisation Individual
Summary of comments This is a very well thought through scheme for the Pebsham country park area, showing a whole range of recycling possibilities. (Richard Watson's scheme for Bio-energy centre etc.,) This really should be given thorough scrutiny as a possible key part of all the objectives of this Framework. It could be a trailblazer.

ref 122
Ward
Response ref 12.11/27
Individual/name of organisation Hastings & Rother Urban Design Group
Summary of comments As all schemes should be required to provide renewable energy, specially identified site should be high quality exemplar schemes meeting much higher targets not just on energy generation but across the spectrum of sustainability.

ref 50
Ward Braybrooke
Response ref 12.11/28
Individual/name of organisation Individual
Summary of comments A review of the planning process may form a new grade of development which falls between Public Open Space and Construction. The new grade for sustainable development would not be as onerous as the existing requirements for construction

ref 126
Ward
Response ref 12.11/29
Individual/name of organisation Hastings Urban Bikes
Summary of comments Develop in shore wave power

ref 124
Ward Old Hastings
Response ref 12.11/30
Individual/name of organisation Individual
Summary of comments Yes! Hastings could produce its own wave power.

ref 30
Ward Conquest
Response ref 12/11/31
Individual/name of organisation Individual
Summary of comments Individual house/site autonomy is not really practical. For example a wind turbine on every house would not only look awful but is also very inefficient. Large turbines off the coast (either as a tourist attraction with a cable car between or south of the rail sheds at Bulverhythe) could work. Wind turbines could also be placed at one or more of the towns "thresholds" – see comment on 4.9 obj 9 point 2.

ref 66
Ward Wishing Tree
Response ref 12.11/32
Individual/name of organisation Individual
Summary of comments For large commercial schemes only – not for domestic schemes. We will still need nuclear power.

ref 53
Ward Braybrooke
Response ref 12.11/33
Individual/name of organisation Individual
Summary of comments Consultation essential

ref 67
Ward
Response ref 12.11/34
Individual/name of organisation Individual
Summary of comments We need a policy on CHP plants for housing schemes above 20/30 units

ref 68
Ward Old Hastings
Response ref 12.11/35
Individual/name of organisation Individual
Summary of comments "Renewable energy schemes" should apply to all sites for development Hastings is rapidly heading for overdevelopment. Identifying more Greenfield sites will exacerbate this situation

ref 147
Ward
Response ref 12.11/36
Individual/name of organisation The Mother Agnes Trust
Summary of comments Places a burden on development in a location where growth and regeneration are imperative, and where viability is finely balanced.

ref 142
Ward
Response ref 12.11/37
Individual/name of organisation Forestry Commission
Summary of comments We wish to ensure that Renewable Energy policies highlight the contribution of biomass to heat production. Biomass can contribute well to on site renewable energy generation, and policies should particularly highlight the role of local wood from existing woodland, sawmill co-products, waste wood (i.e. that would otherwise be landfilled) and energy crops. Many of the benefits derived from woodland are dependent on their active management and there is therefore a need to develop markets for wood products to encourage management. Many woodlands are an economic asset which require market stimulation and investment to achieve their full potential. We therefore welcome the support for promotion of renewable energy, particularly woodfuel, the benefits of which would also include encouragement of rural skills and employment

Question 12.12

Do you consider that draft South East Plan Policy NRM3 Sustainable Risk Management policy covers the flood risk issues for Hastings?

Responses to this question: Total number of responses: 77
Individuals: Total 51
Local Groups: Total 9
Developers: Total 3
Statutory Agencies: Total 6
Other (including anonymous): Total 8

Response percentages: Agree – 47% Disagree – 35% No Opinion – 18%

Additional comments made on chapter 12

ref 110
Individual/name of organisation Individual
Summary of comments Adopt a requirement for 10% renewable energy provision in all new build housing and commercial premises based upon the calculated annual energy use with provision to increase this requirement

ref 149
Individual/name of organisation Environment Agency
Summary of comments
Paragraph 12.6: This section makes reference to "protecting groundwater and water quality", however we suggest that this is changed to read "protecting groundwater and surface water quality". There is mention in paragraph 12.6 of "planning ahead to provide adequate water infrastructure and development" however this requires further expansion to deal with the potential impact on water quality from the provision of additional new housing in terms of sewage disposal.

Flood Risk – Paragraphs 12.16 – 12.19: In addition to referring to areas that are at risk from coastal and river flooding, we also highlight the need to identify other sources of flooding in your borough as prescribed by PPS25. Examples of other types of flooding are identified in Annex C (Forms of Flooding) of PPS25 and include overwhelmed sewers and drainage systems as well as rising groundwater and overland flows.

Also at a national planning policy level, we bring your attention to the DEFRA document titled 'UK Making Space for Water, 2005'. This aims at allowing space for water in order to avoid floods and erosion though an integrated approach. This is relevant to addressing flood risk issues and preparing for climate change in Hastings.

Flood Risk: Although there is some reference made to Planning Policy Guidance 25: 'Development and Flood Risk' (PPG25, 2001) and the emerging Planning Policy Statement 25 (PPS25, 2005), we reiterate the need for any future development within your borough to be informed by a Strategic Flood Risk Assessment (SFRA) in accordance with national policy.

Draft PPS25 requires that an SFRA is carried out to inform the preparation of Planning Authorities Local Development Document's, having regard to catchment wide flooding issues which affect the area. As well as taking into consideration tidal and fluvial flooding, we also highlight the need to identify other sources of flooding including overwhelmed sewers and drainage systems, rising groundwater and overland flows as prescribed by PPS25.

We further highlight that PPG25 and the consultation draft PPS25 suggest that the sequential test required for development and flooding can be combined with the sequential approach required by Planning Policy Statement 3: 'Housing' (PPS3, 2006). It is important that the sequential test is understood in both of these contexts with regard to the location of housing development in Hastings.

Water Quality: Throughout the document, there is very little reference to the importance of protecting water quality. It is pertinent that every effort is made to protect water quality within the Hastings Borough and this includes both surface waters and groundwater.

Reference should also be made to the Water Framework Directive 2000/60/EC. This is important given that it does not allow the deterioration of a waterbody and also expands the scope of 'water protection' to include all waterbodies, including rivers, coasts, estuaries, lakes, man made structures and groundwater.

Furthermore, we highlight that Hastings has many small watercourses, some spring fed as well as lakes and ponds and these have not been mentioned within the report.

Groundwater & Contaminated Land: The Strategy has no outline of the geological or hydrogeological setting in Hastings. It should be noted that there are numerous springs and streams found across the borough, with much of the underlying geology classified as minor aquifers. We highlight that there are a small number of groundwater and surface water abstractions, with associated Source Protection Zones. Therefore, we would expect to see these identified on the adopted Proposals Map.

There are a number of policies that are relevant to this document with regards to groundwater and contaminated land, however there is no reference to these. We would like to see Planning Policy Statement 23: Planning and Pollution Control (PPS23, 2004) acknowledged. This policy promotes a tiered risk assessment of potential pollution in relation to re-development of brownfield sites. In addition, we would wish to see the inclusion of the Environment Agency's Policy and Practice for the Protection of Groundwater (PPPG) with the adoption of Groundwater Protection: Policy and Practice (GP3) when it eventually supersedes PPPG.

Waste Management: Although we are pleased to see that the issues of recycling and using 'waste as a resource' are addressed, we feel that there is further opportunity to address wider waste issues throughout the document.

It is essential that waste growth is addressed and we would like to see explicit mention to the types of waste streams that are to be dealt with by your Local Development Framework. The different streams we would expect to see covered include household, commercial industrial, biodegradable municipal waste and construction demolition & excavation wastes.