



Report 2

NORTH BEXHILL APPRAISAL AND RECOMMENDATION OF DEVELOPMENT OPTIONS

August 2016



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Issue Date: August 2016

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Prepared on behalf of Rother District Council by
CSA Environmental.



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Foreword

The North Bexhill Appraisal and Recommendation of Development Options report has been prepared by CSA Environmental on behalf of Rother District Council. The report identifies and assesses the potential development options for North Bexhill, and subsequently recommends the preferred option for growth, together with proposing how the development should integrate with the construction of the North Bexhill Access Road.

It is intended that the potential development option for North Bexhill is to be included in the consultative draft of the Development and Site Allocations Plan.

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Chapter 1

Introduction

Introduction

1.1 Background

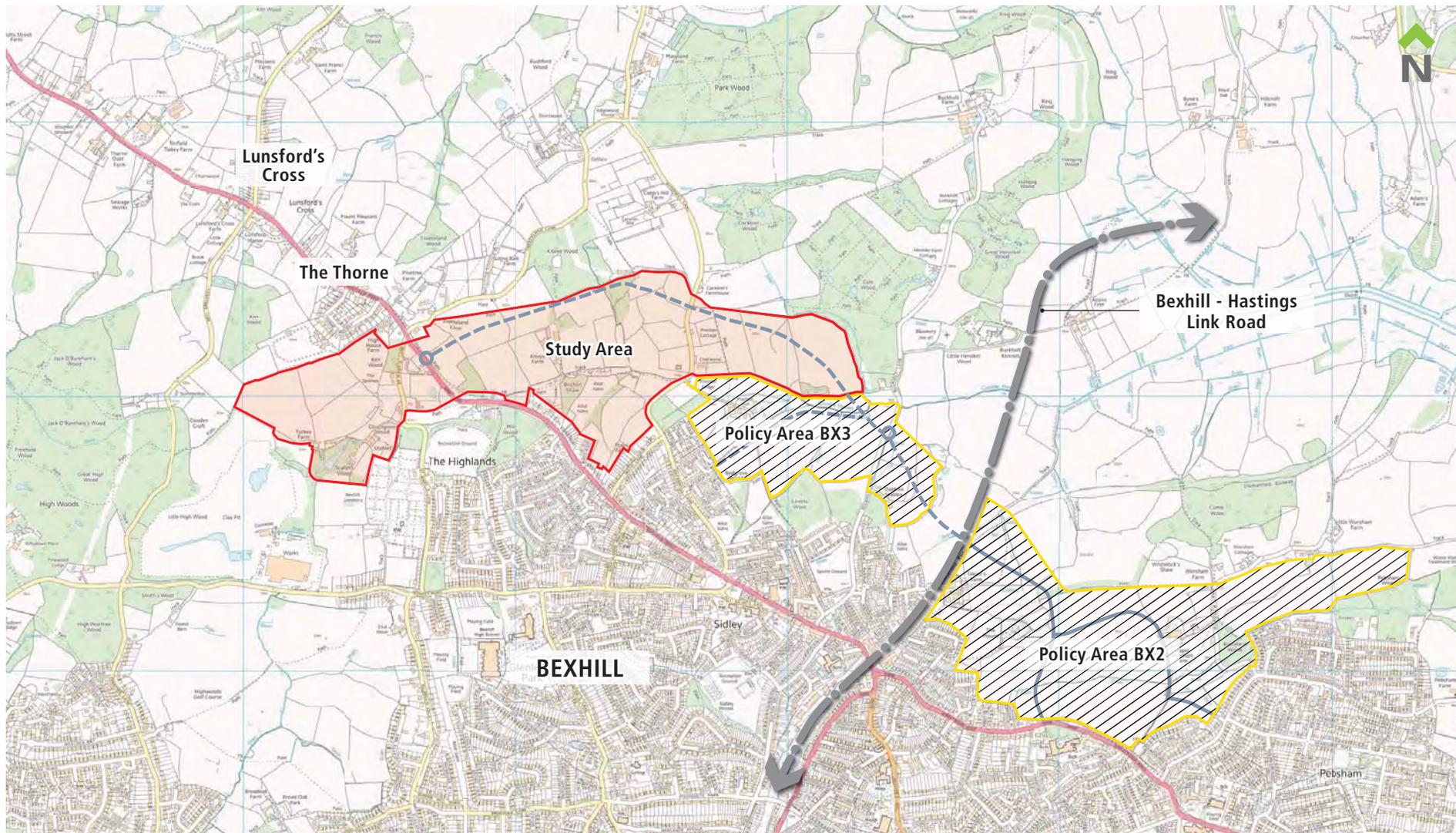
CSA Environmental have undertaken the North Bexhill Appraisal and Recommendation of Development Options on behalf of Rother District Council. This report forms the second of a suite of two documents that together comprise a focussed study that evaluates the nature and extent of the development potential of a broad location of growth to the north of Bexhill.

Bexhill is the main town and administrative centre in Rother District with a population of some 43,700 people and 19,800 households. The strategy for the development of the town is set out in Chapter 8 of the Local Plan Core Strategy (LPCS), which was adopted in September 2014. This envisages significant growth both in housing (3,100 dwellings) and business floor space (at least 60,000 sq.m) between 2011 and 2028. This new development is integral to a broader strategy to make the town more prosperous and vibrant, with a more balanced demographic profile.

LPCS Policy BX3 (Development Strategy) makes provision for major growth to the north of Bexhill, following on from that already planned (by saved Local Plan policies) at North East Bexhill. Development at North East Bexhill has been facilitated by the construction of the Bexhill to Hastings Link Road, which opened in December of 2015 (Figure 1.1).



Extracted pages from Rother Local Plan Core Strategy Adopted 2014



 Study Area

 Strategic Growth Area: North East Bexhill
 Policy Area BX2 - Land north of Pebsham
 Policy Area BX3 - Land North of Sidley

Figure 1.1: Study Area

The general location of the further growth to the north of the town is shown on LPCS Key Diagram Map 2 (Figure 1.2). This shows a new road being built linking the new Bexhill to Hastings Link Road to the A269 (Ninfield Road) just beyond the existing settlement edge, which was identified as necessary to accommodate the scale of planned growth for Bexhill in highway terms.

This new road is known as the North Bexhill Access Road. In addition to providing access to the new development within the Study Area, it will provide a direct connection to the proposed business sites within the growth area at North East Bexhill. The Access Road has received funding approval from the Growth Deal via the South East Local Enterprise Partnership (LEP), and the proposals for the road scheme are being led by Sea Change Sussex. The Access Road received Conditional Approval for a Full Planning Application in January 2016 (LPA Ref: RR/2015/2260/P), further details of which are set out in Chapter 3 (Section 3.2) of this report.

The expansion of Bexhill to the north will, in tandem with the allocated development at North East Bexhill, make a significant contribution to meeting the town’s development requirements over the period of the new Local Plan (2011 – 2028). The Strategic Housing Land Availability Assessment (June 2013) was prepared to support the LPCS identifies the ‘broad location’ for future growth to the north of the town (Ref BX102, p2 and p7 of ‘Tables and Maps’). It gives an indicative scale of housing growth of 300 to 575 dwellings. This broad location for future growth forms the area of search for which this Study examines (See Figure 1.1).

Although the land to the north of Bexhill will principally be developed for new housing, it will also include some employment development and community facilities, together with supporting green infrastructure.

For the purposes of this Study the term ‘Study Area’ is used to describe the land to the north of Bexhill.

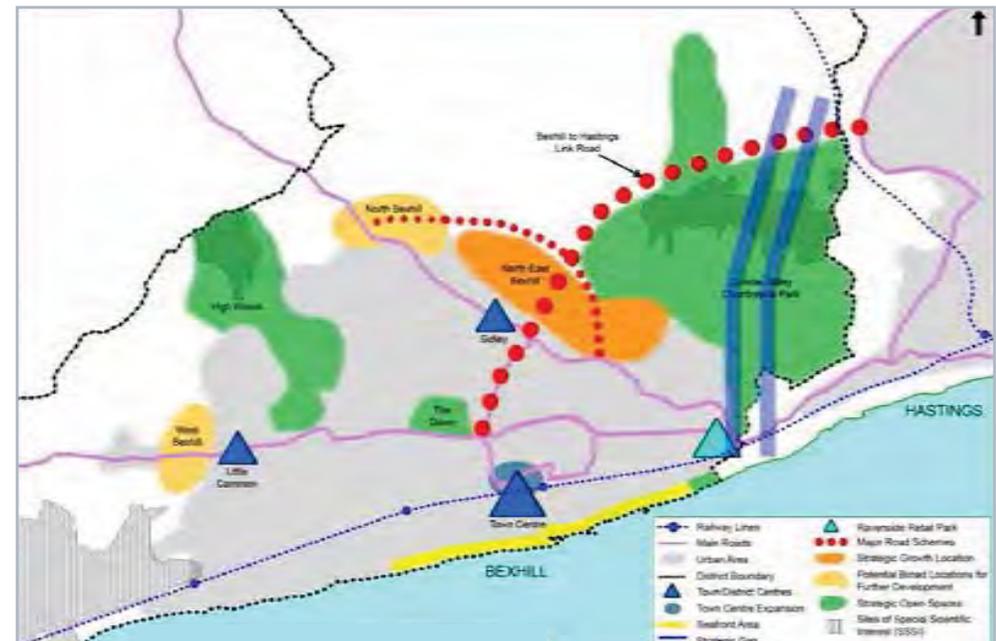


Figure 1.2: Key Diagram Map 2 (Source: Local Plan Core Strategy 2014)

1.2 Purpose of Report

The purpose of this report is to identify and assess the potential development options for North Bexhill, and to subsequently recommend the preferred option for growth, together with proposing how the development should integrate with the construction of a new local distributor road. It is anticipated that the recommendations of the preferred development option will lead to a resultant allocation or allocations. The preferred Development Option is illustrated as a 'Spatial Masterplan' showing the distribution of the principal land uses, principles of access and circulation and required areas of strategic green infrastructure.

The assessment and recommendations of this report carefully consider the evidence base of the landscape and ecological findings presented in the North Bexhill Landscape and Ecological Study. It is intended that this work will form the basis of the draft proposals to be included in the consultative draft of the 'Development and Site Allocations Plan' (DaSA).

This report covers the following areas:

- **Chapter 2: Guiding Principles for Development** - Draws together the findings of the North Bexhill Landscape and Ecological Study to create a clear framework of strategic development principles in order to inform the formulation of the Development Options.
- **Chapter 3: Development Options** - The formulation of a set of Development Options that follow the framework of strategic development principles.
- **Chapter 4: Sustainability Appraisal** - To identify the most sustainable Development Options through the integration of social, environmental and economic considerations.
- **Chapter 5: Recommendation: Preferred Development Option** - Based upon the findings of the Sustainability Appraisal, the recommendation of the preferred Development Option.
- **Chapter 6: Recommendation: Integration with new local distributor road** - A series of recommendations on how the development of the Study Area should integrate with the North Bexhill Access Road.
- **Chapter 7: Summary and Conclusions** - Summarises the findings and recommendations of this report and explains the next steps for how the North Bexhill allocation will be taken through the Development Plan process.





Chapter 2

Guiding Principles for Development

Guiding Principles for Development

2.1 Introduction

The production of the Landscape and Ecological Study has resulted in a large level of information. This information forms an important part of the evidence base for formulating the potential Development Options for the development of the Study Area and subsequently assessing the sustainability of these options and recommending the preferred Development Option. This chapter therefore draws together the findings of the Landscape and Ecological Study to create a clear framework of strategic development principles. This framework will be used to inform the formulation of the subsequent Development Options contained in the following chapter.

The framework will take the form of a 'Strategic Regulating Plan' that illustrates the fundamental constraints and opportunities to development in the Study Area. This plan is supported by a set of written 'guiding principles of development' which the Development Options should seek to adhere to. For the purposes of clarity and ease of reference, these principles are set out in a table format, setting out the fundamental principle and concisely explaining the rationale behind it.

The approach of creating a Strategic Regulating Plan and set of guiding principles of development will ensure that the formulation of the Development Options can be considered 'reasonable' in the first instance and avoid the formulation of unrealistic scenarios for potential development.

2.2 Findings of the North Bexhill Landscape and Ecological Study

The North Bexhill Landscape and Ecological Study appraised the relevant landscape and ecological factors bearing upon the development potential of the North Bexhill Growth Area. It was split into two principal components to comprehensively appraise the identified broad location of growth around the northern edge of Bexhill.

2.3 Landscape Study

2.3.1 Relationship with the Existing Urban Area / Settlement Pattern

The built up area of Bexhill lies to the south of the Study Area. The Landscape Study found that due to the Study Area's size, its relationship with the existing settlement edge is not consistent due to the presence of different land uses, the area's topography and existing landscape features. In the western section of the Study Area, the Landscape Study finds that it is separated from the wider settlement by the open space at Bexhill Cemetery and the recreation ground. As result, development in this location, particularly on the northern valley side, would be separated from the main settlement at Bexhill. This poor relationship would make it difficult to successfully integrate the new development with the existing settlement edge. The Landscape Study also concluded that development to the west of St Mary's Lane could result in coalescence with the adjoining settlements at Lunsford's Cross and The Thorne.

To the east of St. Mary's Lane and Ninfield Road the Landscape Study finds that Landscape Description Units (LDU) D, E and F possessed a stronger relationship with the existing settlement edge, including with the existing housing development along Ninfield Road, Mayo Rise and Mayo Lane. It also sets out that within these parts of the Study Area are the urban fringe influences of the existing allotments and horsiculture. Within the northernmost parts of this location the Landscape Study recommends

that new woodland planting could be established along the higher ground to preserve the separation with the adjoining settlements at Lunsford's Cross and The Thorne.

The areas of the Study Area immediately to the west of Watermill Lane are found to possess a poorer relationship with the existing settlement edge, particularly further to the north, although it should be noted that if the parts of the Study Area directly to the south come forward for development then this relationship would change. However, the Landscape Study recommends that the lower slopes of the valley in this location could be retained free from development to provide a setting for the existing public footpath and watercourse.

To the east of Watermill Lane the Landscape Study finds the Study Area in this location is presently poorly related to the existing settlement pattern. However, the Study concludes that future development in North East Bexhill would extend the urban area of the town to the south of Preston Hall making this area a more logical zone for expansion. However, the presence of the listed Preston Hall is seen to be an important consideration in locating future development with the Landscape Study recommending that development should be avoided on the lower slopes of the valley which would intrude on the setting of the Hall and on the existing watercourse.

2.3.2 Landscape and Visual Sensitivity

In common with the Study Area's relationship with the existing settlement pattern, its large size means that there are a number of influences and factors that result in it possessing areas of differing landscape and visual sensitivity.

To the west of St Mary's Lane, the Landscape Study concludes that the Study Area in this location has a pleasant rural character and exhibits characteristics of the wider High Weald landscape character area, particularly in the north western field. The Landscape Study also finds that there are views of this area from St. Mary's Lane, Bexhill Cemetery and from the existing public footpath and caravan park to the north. It also set out that long distance views tend to be contained by the intervening topography and significant areas of established vegetation.

To the east, adjacent to St. Mary's Lane, Ninfield Road and Mayo Lane, the parts of the Study Area are found to have an undistinguished landscape character with the existing settlement edge detracting from its landscape character. In particular, the area located between St. Mary's Lane and Ninfield Road is identified as having a relatively ordinary scenic value and being well contained in views, apart from some localised views. The Landscape Study explains how the parts of the Study Area bound by Ninfield Road, Mayo Lane and Watermill Lane are visible

from the adjoining valley side to the north, although, in these views this area is perceived alongside the existing settlement edge. Directly to the north, the Study Area sits on the south facing slope of this valley with the higher ground to the north identified as being sensitive in landscape and visual terms.

The area to the west of Watermill Lane is found to have a relatively intact field structure, which provides a contrast with the larger field structure in other parts of the Study Area. This location therefore has a pleasant character with a stronger sense of remoteness to the north. In visual terms, it is well contained from the wider landscape, although there are open views to the north from the existing public footpath which follows the northern extent of the Study Area in this location.

The Landscape Study identifies how to the east of Watermill Lane the Study Area sits on the opposing side to the existing valley and therefore is contained by the ridgeline and woodland to the north. This location is found to have a pleasant, rolling landform, although it possesses relatively ordinary scenic qualities in comparison to the wider landscape character. In common with other parts of the Study Area, the higher ground to the north is considered to be more visually sensitive in views from the immediate north.

2.3.3 Capacity to Accept Change

Based upon the above considerations, the Landscape Study concludes that some parts of the Study Area have a better capacity to accept change than others.

The areas to the east of St. Mary's Lane and Ninfield Road and to the north west of Mayo Lane are found to have the highest capacity to accommodate new development, with them possessing a **moderate high** capacity to accept change, as it would not appear discordant with the existing settlement pattern on the northern edge of Bexhill and be well related to the existing edge of the town, with the area being separated from the wider landscape to the north as a result of the intervening topography.

The Landscape Study considers that development of the Study Area to the west of St. Mary's Lane would be separated from the main settlement at Bexhill due to existing areas of open space and topography, with the capacity to accept change reducing from a **moderate** capacity in the eastern part of the location to a **moderate low** capacity in the westernmost part.

The areas of the Study Area to the west of Watermill Lane are found to have a varied capacity to accommodate change. The northernmost area is concluded to have a **moderate low** capacity owing to its inherent landscape qualities. The area to the south and west (LDU C) is found

to have a **moderate** capacity owing to its inherent landscape qualities and dislocation from the existing settlement edge. However, its visual effects would be relatively localised owing to the containment of this area in views from the wider landscape.

The majority of the area to the east of Watermill Lane is concluded by the Landscape Study to have a **moderate** capacity to accommodate new development in conjunction with the wider planned expansion at North East Bexhill. However, the higher ground in this area is found to have a **moderate low** capacity to change due to it being more visually sensitive in views from the immediate north.

2.4 Ecological Study

The Ecological Study finds that the Study Area is dominated by semi-improved grassland, woodland parcels and hedgerows. The Combe Haven valley, which bisects the Study Area in an east to west direction, is found to support key wetland habitats. The Study also finds that the habitat features across the Study Area contribute to connectivity between ecological features in the local landscape such as Ancient Woodland. These habitats are also likely to support a range of notable and protected wildlife, including bats, badgers, dormice, birds, reptiles and amphibians.

Searches carried out as part of the Ecological Study show that there are no designated wildlife sites within the Study Area. However, the searches do show that there are a number of Sites of Nature Conservation Interest (SNCI) and Sites of Special Scientific Interest (SSSI) that occur within close proximity of the Study Area. The Ecological Study recommends that potential access to these sites from future proposals at North Bexhill will need close consideration due to potential increased visitor pressures and hydrological and pollution impacts. Therefore, the Ecological Study also establishes that measures to avoid impacts and maximise opportunities to enhance, restore and improve access to such sites should be incorporated into new development proposals for the area, with strategic green infrastructure principles being applied.

The Ecological Study identifies that the Study Area falls within a Biodiversity Opportunity Area (BOA). Consequently, in line with the objectives of the BOA, future proposals within this area should seek to retain and enhance existing key habitat features, maintain and improve linkages between key habitats and maximise the creation of new habitats to form meaningful habitat corridors across the landscape. Where habitats could be lost/impacted appropriate mitigation and/or compensation measures will be required to ensure no net loss of biodiversity occurs as a result of new development.

Habitats across the Study Area offer opportunities for a range of notable/protected species to be present. Therefore, the Ecological Study recommends that protected species surveys should be undertaken at the appropriate time to determine the species present and inform assessment of the importance of the Study Area for these species. In advance of protected species survey data being available, the Ecological Study identifies potential constraints to possible European Protected Species (EPS) licensing requirements in respect of bats, dormice and Great Crested Newts, which would convey strict mitigation and compensation requirements on the proposed development area. The Study also finds that mitigation for potential impacts to badgers, reptiles and birds are also likely to be of relevance. These findings add further weight to the principle of establishing meaningful habitat corridors in line with the objectives of the BOA.

2.5 The Strategic Regulating Plan

The Strategic Regulating Plan (Figure 2.1) draws together the findings of the Landscape and Ecological Study by visually representing the fundamental constraints and opportunities to development in the Study Area.

From a landscape and visual sensitivity point of view the Regulating Plan shows that the more central parts of the Study Area have the highest capacity to accommodate new development, with the Landscape Study finding these to have a **moderate high** capacity. The Strategic Regulating Plan shows how the capacity of the Study Area to accommodate new development reduces to both the west and east of this central area. The parts of the Study Area that have the lowest capacity to accommodate development (**moderate low**) are located in the western extent of the area and the locations immediately to the east and west of Watermill Lane adjacent to the northern boundary of the Study Area.

The Strategic Regulating Plan illustrates how the Study Area is bisected by a strong framework of hedgerows and tree belts, and watercourses including the Combe Haven which runs along the eastern section of the Study Area's southern boundary. The plan also shows where the Study Area contains tranches of mature woodland, some of which is ancient in origin. These existing landscape features form the focus of the Study Area's ecological and landscape value and provide connectivity between existing woodland blocks and habitat of value for protected species. Therefore, they provide important opportunities for significant habitat creation as well as recreational opportunities, together with space to accommodate new SuDS features. These areas of open space also provide opportunities for new woodland creation which will not only supplement existing woodland, but also could be located on the higher ground to screen views from the north, provide an appropriate backdrop to new development and

preserve the separation with the adjoining settlements at Lunsford's Cross and The Thorne.

The fields immediately to the west of Watermill Lane are seen to have a more intimate field pattern in comparison to the rest of the Study Area, consisting of smaller scale fields, sub-divided by a network of treed hedgerows. This area also contains grassland habitat potentially more diverse than that of the rest of the Study Area, which the Ecological Study recommends should be retained if possible.

A number of Areas of Restraint were also identified by the Landscape Study and these are shown on the Strategic Regulating Plan. These comprise small zones of the Study Area which are considered to contribute to the landscape character or setting and therefore which should act as a constraint to development in these locations.



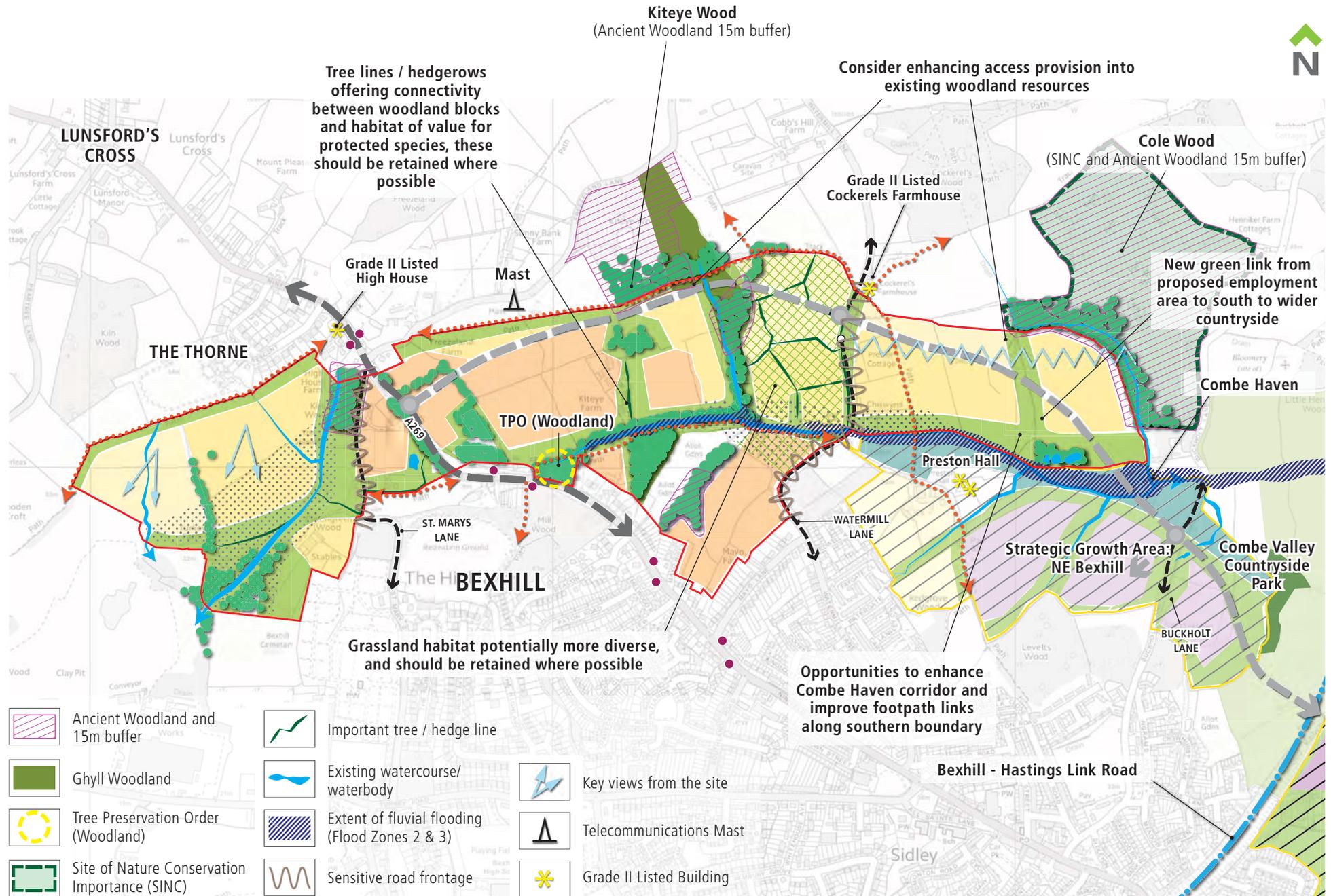


Figure 2.1: Strategic Regulating Plan

2.6 Guiding Principles of Development

2.6.1 Sustainability and Planning Policy Context

The Guiding Principles of Development have been prepared to support the Strategic Regulating Plan. These principles of development are based upon the salient findings of the North Bexhill Landscape and Ecological Study set out above. The Development Options prepared for the study area adhere to these Guiding Principles of Development to ensure they are underpinned by the evidence base established by the Landscape and Ecological Study.

The Rother Local Plan Core Strategy sets out that at the heart of planning, at all levels, is the principle of 'sustainable development'. The Guiding Principles of Development, therefore, are underpinned by the principle of sustainable development. In essence, sustainable development is about ensuring a better quality of life for everyone both now and in the future. It means a more inclusive society that achieves and shares the benefits of increased economic prosperity, in which the environment is protected and improved and there is a less wasteful use of natural resources.

Policy OSS3 (Location of development) of the Core Strategy sets out that in assessing the suitability of a particular location for development proposals should consider, amongst other issues, the distinct character of an area and the character and qualities of a landscape. The Core Strategy amplifies these important environmental considerations by establishing the following environmental objectives:

- To conserve, manage and, where appropriate enhance, the high quality landscape resources.
- To protect important ecological resources in the district and, where appropriate, enhance these as part of a wider approach to 'green space'.
- To place strong emphasis on design quality in all development.
- To protect communities from flooding and effectively manage risk.

A number of policies within the Core Strategy provide further clarification on how these objectives should be met. Policy EN1 (Landscape Stewardship) seeks to ensure the protection, and wherever possible, enhancement of landscape features, including Ancient Woodland, native hedgerows, copses, field patterns, ditches, ponds and water courses.

Policy EN5 (Biodiversity and Green Space) establishes district-wide environmental aims. Of relevance to the Study Area is the objective to increase accessibility to the countryside from the Bexhill fringes. The policy also seeks to ensure development retains, protects and enhances habitats of ecological interest, including ancient woodland, water features and hedgerows, and provide appropriate management of these features. Another salient requirement of the policy is for developers to integrate biodiversity into development schemes by avoiding adverse impacts from development on biodiversity or habitat, or where wholly unavoidable, provide appropriate mitigation against or compensation for any losses. Developers will also be expected to consider and promote opportunities for the creation and/or restoration of habitats appropriate to local context.

Policy EN7 (Flood Risk and Development) requires that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at highest risk of flooding. A small part of the Study Area is subject to flood risk along the route of an existing watercourse and where this watercourse becomes the Combe Haven in the south eastern part of the Study Area. The policy also requires the implementation of sustainable drainage systems (SuDS) to mitigate flood risk as a result of the new built development.

Policy BX1 (Overall Strategy for Bexhill) establishes some more locally specific sustainability principles relevant to the Study Area. The policy establishes the requirement to develop local amenities in the town, including a network of accessible green space around the town and the implementation of the Combe Valley Countryside Park between Bexhill and Hastings. The policy also seeks to deliver new recreational routes into the Countryside Park.

Policy BX3 (Development Strategy) establishes the development strategy for Bexhill between 2011 – 2028. The policy sets out that part of the town's future residential and employment growth should be focussed to the north of the town (i.e. the Study Area), the scale, timing and locations of which will ideally be determined through the Site Allocations process. The supporting text to the policy highlights that growth in the Study Area provides the opportunity to extend the proposed 'country avenue' serving the existing allocation in the area of Preston Hall Farm as far as the A269, Ninfield Road, thereby relieving Sidley of significant through traffic. The supporting text also establishes that development within the Study Area should contribute to the extension of accessible green space from the Combe Valley Countryside Park towards the High Woods area.

	Guiding Principle of Development	Description
A	To retain and enhance existing key habitat and landscape features.	A basic tenet is to work with and value what is already there. This will ensure that new development within the Study Area maintains the existing key habitat features and provides the basis to deliver enhancements to existing habitat and landscape features. These features should include the Study Area's ancient woodland, existing water courses and hedgerows. Enhancements to these features should assist in providing new valuable resources for local wildlife and reinforce existing landscape features such as hedgerows and stands of trees. This principle accords with the provisions of Policy EN 5 of the Core Strategy.
B	To maintain and improve linkages between key habitats and maximise the creation of meaningful habitat corridors across the Study Area.	The existing linkages between key habitats should be maintained to provide wildlife corridors. These corridors should maintain the movement of wildlife through the Study Area and provide a sense of continuity between town and country. New landscaping should enhance the corridors through habitat creation. This principle accords with the provisions of Policy EN 5 of the Core Strategy and the objectives of the BOA.
C	To mitigate the loss and/or impact on habitats with appropriate compensation measures.	The development of the Study Area may result in the loss of some existing landscape or habitat features, such as where new roads serving the proposed development parcels require the removal of an area of hedgerow. The Development Options for the Study Area should therefore provide sufficient space to provide appropriate mitigation against any losses. This principle accords with the provisions of Policy EN 5 of the Core Strategy.
D	To maximise opportunities to enhance important landscape and ecological features as part of a wider approach to green space.	The Study Area should not be viewed as an isolated parcel of land. Its location on the northern fringes of Bexhill means that it possesses a number of landscape and habitat connections that are contiguous with its surroundings. These features include the Combe Haven, existing hedgerows and areas of adjacent woodland that are contiguous with woodland within the Study Area. Therefore, consideration should be given to how the spatial layout of the development proposals can facilitate enhancements of these wider landscape and ecological features. This principle accords with the provisions of Policy EN 5 of the Core Strategy.
E	To provide accessible green space that can form an integrated part of a wider network of green infrastructure around the town.	In accordance with Policy BX1 of the Core Strategy, the development of the Study Area should secure a green infrastructure link to the Combe Valley Countryside Park, which lies just to the east. This should be achieved by delivering new recreational routes from the new development to the Countryside Park. The opportunity to utilise existing public rights as part of the network of new routes should be explored.

Figure 2.2: Guiding Principle of Development Table

	Guiding Principle of Development	Description
F	To ensure new development avoids areas at risk from flooding.	In accordance with Core Strategy Policy EN7, the Development Options should avoid locating new development within parts of the Study Area that are at highest risk from flooding.
G	To avoid locating development within the parts of the Study Area that have a moderate low capacity to accommodate new development.	The Landscape Study found that some parts of the Study Area have a moderate low capacity to accommodate new development due to their remoteness from the existing settlement edge of Bexhill, their inherent landscape qualities, and being more visually sensitive in views from the north. This principle accords with Policy OSS3 which requires proposals for new development to be considered in the context of the character and qualities of the landscape.
H	To avoid locating development that would result in coalescence with the adjoining settlement at Lunford's Cross and The Thorne.	The Landscape Study found that new development in parts of the Study Area would result in coalescence with Lunford's Cross and The Thorne. Therefore, the Development Options should be structured to avoid coalescence issues in accordance with Core Strategy Policy OSS3, which places weight on considering the character of existing settlements.
I	Avoid parts of the Study Area indicated as Areas of Restraint.	The Landscape Study has identified some zones within the Study Area which contribute to the landscape character or setting of an LDU. These Areas of Restraint should act as a constraint to development in these locations in order to maintain these important parts of the Study Area.

2.7 Summary

This section has established a set of guiding principles of development based upon the findings of the Landscape and Ecological Study. These guiding principles have been devised to inform the Development Options for the Study Area contained in the following chapter. These guiding principles of development are supported by a Strategic Regulating Plan which illustrates the fundamental constraints and opportunities to development in the Study Area. Together, the guiding principles and the Strategic Regulating Plan discount certain parts of the Study Area for development to ensure the following Development Options do not put forward unrealistic scenarios for future development.

The guiding principles of development contained within this section have been underpinned by the principle of sustainable development. To this end, careful consideration has been paid to the relevant policies in the Rother Local Plan Core Strategy which should be adhered to in putting forward sustainable development scenarios for North Bexhill.

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Chapter 3

Development Options

Development Options

3.1 Introduction

The previous chapter summarised the findings of the North Bexhill Landscape and Ecological Study and established a set of guiding principles based upon the findings of the Study. These guiding principles, which are underpinned by the principle of sustainable development, are supported by a Strategic Regulating Plan which illustrates the fundamental constraints and opportunities within the Study Area.

This chapter puts forward a set of potential Development Options which explore how the Study Area could be brought forward for new housing and business development. Each Development Option is presented as a 'spatial masterplan' by identifying the principal development areas, spaces and movement routes. Each option is also supported by explanatory text that sets out the rationale behind its formulation and how it adheres to the framework of guiding principles of development.



3.2 The North Bexhill Access Road

The general location of the future growth to the north of Bexhill is shown on Local Plan Core Strategy Key Diagram Map 2 (Figure 3.1). This shows a new road being built linking the new Bexhill to Hastings Link Road to the A269 (Ninfield Road) just beyond the existing settlement edge, which was identified as necessary to accommodate the scale of planned growth for Bexhill in highway terms.

This new road is known as the North Bexhill Access Road. In addition to providing access to the new development within the Study Area, it will provide a direct connection to the proposed business sites within the growth area at North East Bexhill. The Access Road has received funding approval from the Growth Deal via the South East Local Enterprise Partnership (LEP), and the proposals for the road scheme are being led by Sea Change Sussex. The supporting text for Policy BX3 (Development Strategy) of the Local Plan Core Strategy sets out that the northerly growth of the town provides the opportunity to extend the existing section of the Access Road serving the existing allocation in the area of Preston Hall Farm to the A269, Ninfield Road, thereby relieving Sidley of significant through traffic.

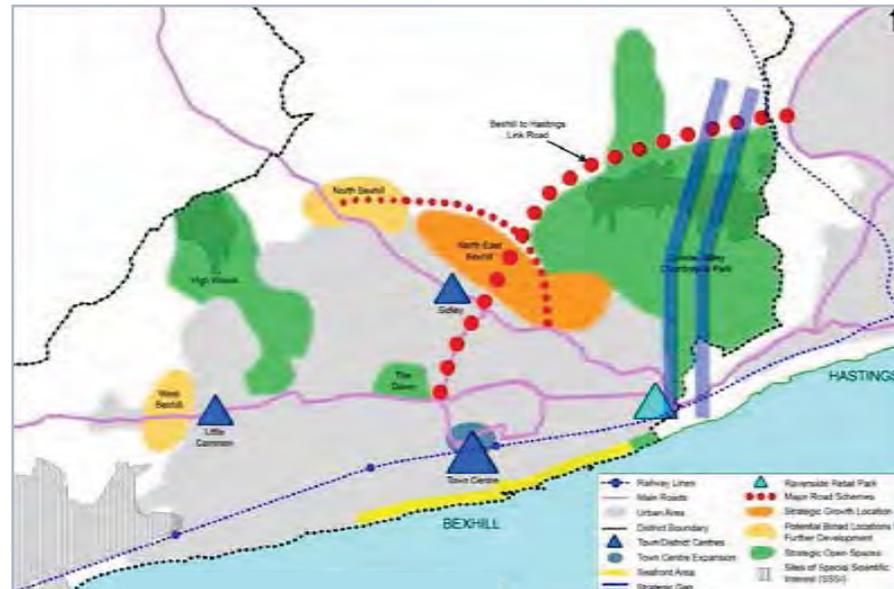
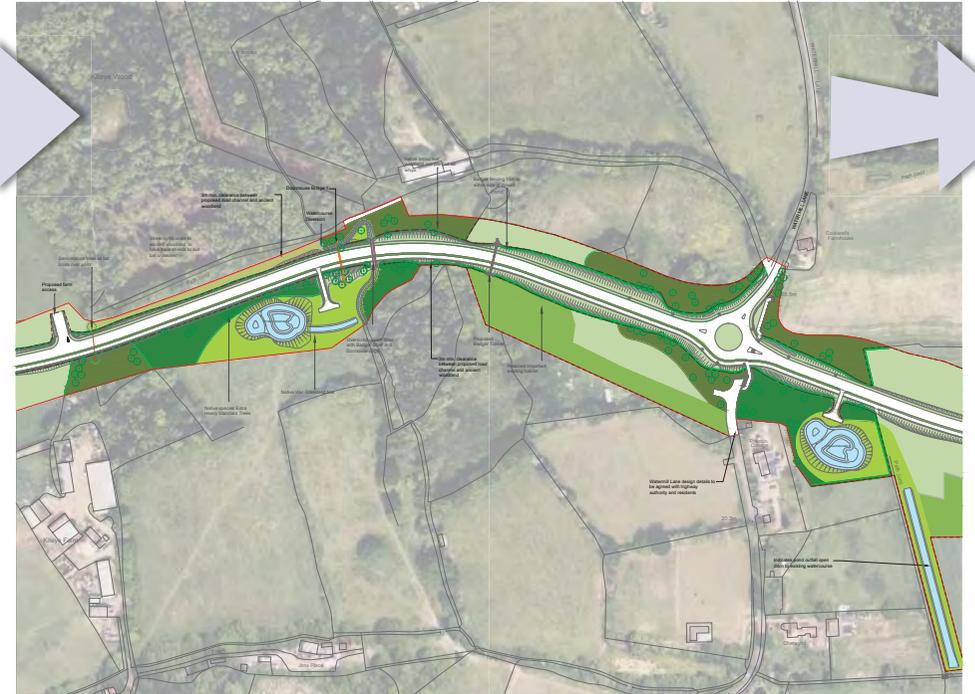
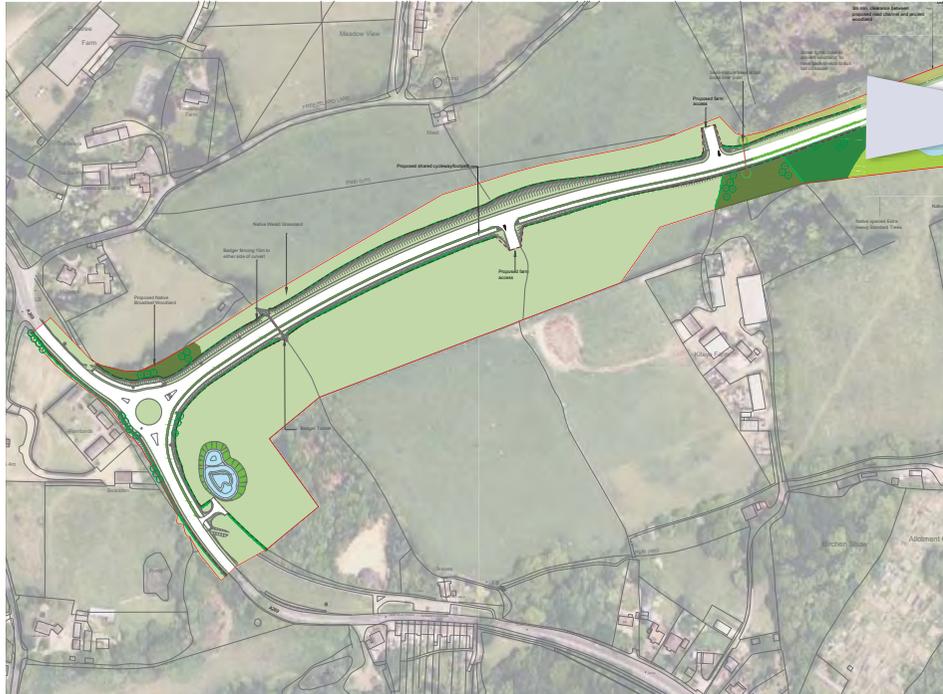


Figure 3.1: Key Diagram Map 2 (Source: Local Plan Core Strategy 2014)



The approved section of the Access Road measures approximately 2.4 km and comprises a 2-direction, single carriageway (7.3m wide) with a segregated 3m-wide shared footway and cycleway. The Access Road includes the provision of three roundabouts. Moving eastwards, the first roundabout ('A269 roundabout') provides a connection with the existing road network at the A269. The second roundabout ('Watermill Lane roundabout') is located just west of the existing Watermill Lane and the third roundabout ('Buckholt Lane roundabout') is located just to the west of the existing Buckholt Lane.

The third roundabout includes a connection, in the form of a spur, to the allocated BX3 employment sites at North East Bexhill. It is proposed that both Watermill Lane and Buckholt Lane would be stopped up south of the respective roundabouts, with each roundabout providing access north onto each lane. In addition, a number of agricultural accesses to the existing farmland have been approved as part of the Access Road design.

A bridge structure over the existing Combe Haven watercourse is proposed. The bridge, design with a central pier, has appropriate clearance for future provision of a riverside walkway. In addition, three culverts are created where the Access Road crosses existing watercourses.

The section of carriageway east of the Buckholt Lane roundabout is designed to a 30mph speed limit, whilst the remainder of the road will have a 40mph speed limit.

Restorative works in relation to the Access Road include 14.87 hectares of restorative works. 3.71 hectares of these works will be wet grassland which will be maintained for the lifespan of the Access Road. The remainder of the restorative works consist of Weald wildflower grassland which will be returned to the landowners for agricultural use following completion of the construction of the Access Road.

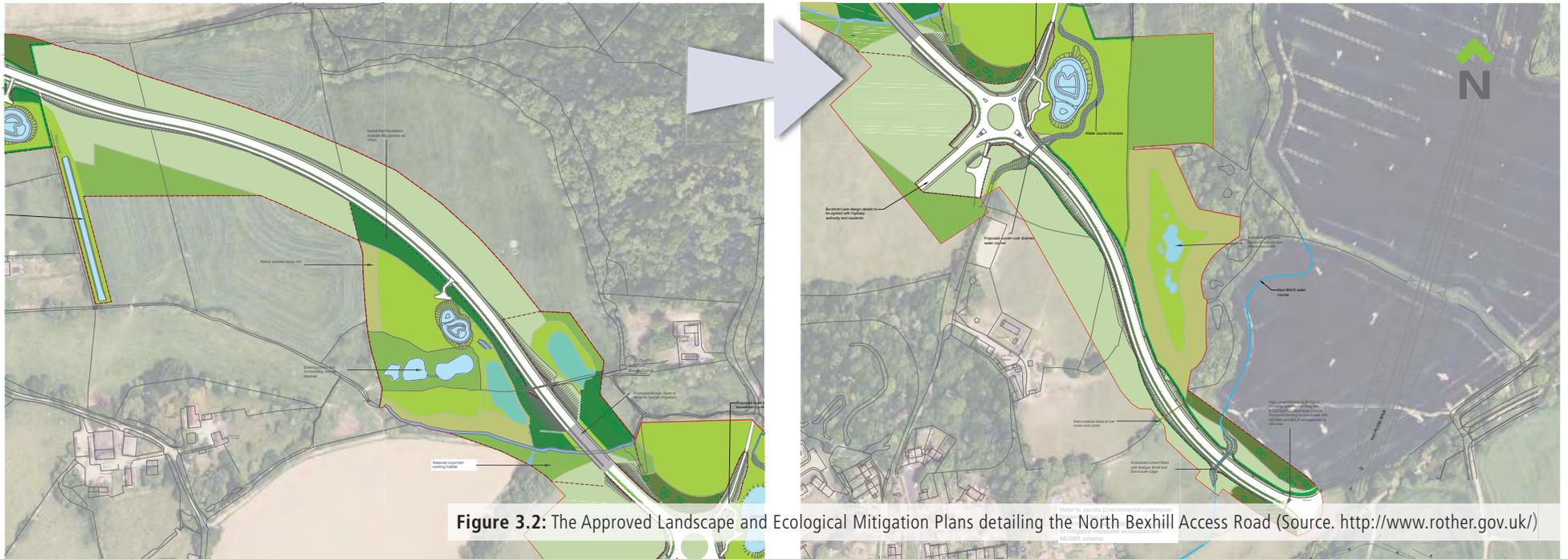


Figure 3.2: The Approved Landscape and Ecological Mitigation Plans detailing the North Bexhill Access Road (Source: <http://www.rother.gov.uk/>)

Other compensation measures include the planting of native woodland/scrub and 4,550 metres of native hedgerows. Detailed compensation measures include two dormouse bridges, two badger tunnels, two oversized culverts with badger shelf and dormouse cage, ecological ponds and two bat hop-overs.

The Access Road utilises Sustainable Drainage Systems (SuDS), which includes a number of open swales and five attenuation ponds. The drainage strategy also includes 2,221 sq.m of flood compensation zones to compensate for the loss of floodplain volume.

The route of the Access Road is an important factor in determining the most appropriate location for growth within North Bexhill, particularly as the Access Road is likely to provide the principal vehicular access points and linkages to the new development parcels, although these points of access do not form part of the approved road scheme.

Given the scale of the proposed highway and its strategic and economic importance it will inevitably have implications for a number of environmental factors, including landscape and ecological features, landscape character and views. In considering each of the options for growth within North Bexhill the following sections provide a commentary on the relationship between the proposed development areas and the North Bexhill Access Road.

3.3 Existing Public Footpaths

A number of existing public footpaths cross the Study Area providing important connections with both the countryside and the existing settlement edge of Bexhill. For the purposes of this report it is assumed that the potential exists to upgrade the existing public footpaths within the Study Area to create new combined pedestrian/cycle routes in order to accord with the objective of creating a series of new traffic-free routes.

3.4 Development Yield Assumptions

3.4.1 Housing Density

The number of dwellings that can be accommodated on each option has been calculated by multiplying the amount of residential development land (stated in hectares) by a net dwelling density of 28 dwellings per hectare (dph). It is assumed that the residential development blocks shown on the Development Options will be developed for housing and directly associated uses, including access road within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas.

The net density of 28 dph reflects that the majority of the Study Area lies on the south facing slope of the valley which extends alongside the northern edge of Bexhill, with the remainder of the Study Area sitting on the opposing valley side. Therefore, the topography of the Study Area dictates a carefully considered density that respects the Study Area's topography. In general terms, at the detailed design stage the topography of the Study Area is likely to result in a lower density form of development as follows:

- The parking for the new homes must have convenient and appropriate access to the dwellings they serve. The dwellings located on the slopes need to be sufficiently set back from the back edge of the pavement to allow for sufficient space for appropriate gradients to be achieved between the car parking spaces and the principal dwelling access point.

- The use of detached and semi-detached dwellings is therefore the most appropriate dwelling form in this instance so that parking can be provided within the plot and to the side of the individual dwellings they serve.
- Given the topography of the Study Area, this approach means that the development will largely comprise of lower density forms with the use of terraced dwellings restricted to the least sloping parts of the Study Area.
- The use of lower density forms will allow for adequate vegetation and tree planting so that the new dwellings will sit within a landscaped setting that respects the topography and existing landscape character of the Study Area.

Worked Example: Calculating Dwelling Yield

Amount of residential development land: 7 hectares

Calculation: 7 hectares x 28 dph = 196 dwellings

3.4.2 Business Floorspace

Sea Change Sussex, who are implementing the employment land at North East Bexhill, have advised that the employment land at North Bexhill will generate a yield of 26%. This means that the amount of employment floor space within a given employment land development parcel equates to 26% of the parcel size. At the detailed design stage, this yield will allow for adequate car parking to be accommodated, therefore avoiding the problems of parked cars over-spilling onto access roads and landscaped areas.

Worked Example: Employment Land Yield

*Amount of business development land:
2.5 hectares (25,000sq.m)*

*Calculation: $25,000 \times 0.26 =$
6,500sq.m of business floorspace*

3.5 Development Options Context

The following three Development Options, which explore how the Study Area could be brought forward for new housing and business development, have been prepared to be sufficiently different in scale to enable their sustainability credentials to be compared, although this does not rule out the ability for refinements to be made to any of them as a result of the Sustainability Appraisal (Section 4).

3.5.1 Housing

The overall scale and general area of housing accommodated by the following Development Options are guided by the LPCS. The LPCS gives an indicative scale of housing growth of 300 to 575 dwellings. The Development Options have been prepared to be broadly in line with the indicative scale of growth set out in the LPCS, albeit Development Option 3 is a little higher than this range. In this respect, it is important to note that the approved route of the NBAR is inherently more accurate than the indicative route shown on the LPCS Key Diagram Map (Figure 1.2), which has allowed for an accurate assessment of the quantum of development that the Development Options can accommodate.

3.5.2 Business Development

In terms of business development land provision, the LPCS identifies a requirement for at least 60,000 sq.m of business floorspace at Bexhill over the plan period to 2028. The existing allocations just to the east of the Study Area either side of the new Link Road ("Combe Valley Way"), total some 50,000 sq.m. Additionally, provision has already been made for up to 3,500 sq.m of business floorspace to the west of the town. Consequently, this creates a deficit in the LPCS requirement for business floorspace totalling 6,500 sq.m.

However, it is important to note that at the time of writing planning permission was recently approved for a major residential-led development within the North East Bexhill area, which included the provision for up to 7,000 sq.m of business floorspace (Application Reference Number RR/2015/1760/P). This recently approved development, therefore, may meet the aforementioned deficit for business development land, although regard is also had to the fact that the LPCS requirement for 60,000 sq.m of business floorspace is a minimum. It is also important to note that the final level of business floorspace that will be delivered in this recently approved development will be subject to detailed design considerations at the Reserved Matters stage. Therefore, it is considered appropriate that the following Development Options consider the potential for 6,500 sq.m of business floorspace to meet longer-term needs.

3.5.3 Potential Traveller Site

RDC is committed through the LPCS to identifying a further five pitches over the plan period to 2028 (six pitches having already been identified elsewhere within the District). The Development Options will therefore accommodate a potential traveller site of 0.2 hectares to accommodate up to five pitches.

3.6 Development Option 1

Option 1 accommodates the following quantum of development:

- Residential development: 15.00 hectares / 420 dwellings

3.6.1 General Design Principles

Option 1 has been prepared to represent the most sensitive Development Option by locating the majority of the development in the central and eastern parts of the Study Area, with no development located to the west of St. Mary's Lane or immediately to the west of Watermill Lane. The location of the potential housing parcels avoids the parts of the Study Area at risk from flooding.

As the LPCS requirement for business floorspace at Bexhill has potentially been met by existing commitments, this Development Option does not include business development.

3.6.2 Access

The parcel of residential development to the west of Ninfield Road would be accessed from the new A269 roundabout. The housing area immediately to the east are shown to be accessed from a new roundabout off Ninfield Road. The proposed development area to the east of Watermill Lane is shown to be accessed from a new access point via the North Bexhill Access Road.

The southern development area is remote from the North Bexhill Access Road. Therefore, it is envisaged that this development parcel should be accessed from the adjacent section of Ninfield Road, which would involve the demolition of at least one existing property, located beyond the limits of the Study Area, to make way for a new vehicular access point. It is assumed that access from Mayo Lane, via at least one existing property, is unfeasible due to the constrained nature of the existing carriageway. Similarly, it is assumed that access from Watermill Lane is not appropriate due to the well landscaped and sunken lane character of the road.

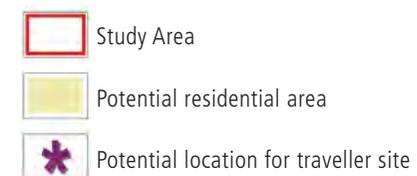


Figure 3.3: Development Option 1



- | | | | | | |
|-------------------------|----------------------------------|-----------------------------------|------------------------------------|-------------------------------------|-------------------------|
| Potential open space | Existing bus route & bus stops | Existing Public Rights of Way | Existing trees and woodland | Potential linear green park | Telecommunications mast |
| Habitat enhancement | Existing vehicular routes | Potential pedestrian/cycle routes | Ancient Woodland & 15 metre buffer | Existing watercourses & waterbodies | Existing ridgeline |
| Playing pitch provision | North Bexhill Access Road | Key pedestrian linkages | Existing Ghyll Woodland | Extent of fluvial flooding | |
| | Potential principal access roads | | Tree Preservation Order | Listed Buildings | |

3.6.3 Green Infrastructure

The Development Option has been structured to retain the Study Area's principal habitat and landscape features including the areas of ancient woodland, the existing water courses and hedgerows. These retained features are set within areas of open space to provide space for new landscaping and areas of habitat creation so that their landscape and ecological value can be enhanced. The open spaces will also allow for new landscaping to mitigate against the loss of any existing vegetation and to establish new woodland blocks on the higher ground to screen views from the north, provide an appropriate backdrop to the new development and preserve the separation with the adjoining settlements at Lunsford's Cross and The Thorne.

The provision of the linear open spaces focussed along the existing watercourses and hedgerows creates a series of wildlife corridors that cross the Study Area in both a north-south and east-west direction. The corridors maintain linkages between key habitats within the Study Area and provide connections to the wider landscape. These open space corridors create a landscape-led structure to this Development Option defining logical locations for potential development parcels which avoid the Study Area's existing landscape features.

The principal open space corridor running through the Development Option is focussed along the Combe Haven and the existing watercourse to the west before it becomes the Combe Haven. This maintains a substantial corridor of open space running in an east to west direction through the Study Area connecting to the Combe Valley Countryside Park to the east. The Development Option shows how a new recreational route could be created in the eastern part of the Study Area to extend eastwards from the existing public footpath that currently runs between Ninfield Road and Watermill Lane alongside the existing watercourse. The extension of the footpath would facilitate the creation of a traffic-free route running from the Study Area to the Countryside Park to the east.

The Development Option also establishes the provision of a potential new traffic-free route extending eastwards from the existing public footpath located within the Study Area just to the south of Cockerel's Farmhouse. This existing footpath already provides good connections both westwards through the Study Area and northwards to the countryside beyond. The Development Option indicates the provision of a potential pedestrian/cycle route leading eastwards from this public footpath in order to provide a second recreational route through the Study Area to the Combe Valley Countryside Park. This route is also proposed to run through a corridor of green infrastructure that wraps around the northern and eastern sides of the potential safeguarded business development area.

The spatial arrangement of the Development Option utilises the north-south aligned open spaces to create a series of traffic-free connections between the existing and proposed recreational routes discussed above. This creates a framework of traffic-free routes convenient to the proposed development parcels, maximising integration with the development's green infrastructure, the wider network of public footpaths beyond the Study Area and the Combe Valley Countryside Park.

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3.7 Development Option 2

Option 2 accommodates the following quantum of development:

- Residential development: 17.20 hectares / 480 dwellings
- Business development: 2.50 hectares / 6,500 sq.m business floorspace

3.7.1 General Design Principles

Option 2 follows the structure and spatial masterplanning principles established by Option 1, with two exceptions:

- The increase in the developable area is afforded by the inclusion of residential development land immediately to the west of Watermill Lane in the area identified as potentially having a high ecological value.
- The proposed employment development is located in the eastern part of the Study Area, to the north of the North Bexhill Access Road where it would benefit from the good degree of accessibility afforded by the new road. The proposed location of the employment area in this option means that it would also benefit from being located close the employment area that is coming forward as part of the North East Bexhill strategic growth area. Residential development land is located in place of the Option 1 employment area.

3.7.2 Access

The principles of access remain the same as Option 1 with two exceptions:

- It is assumed that an additional access point off the North Bexhill Access Road would be required to provide a separate access point to the residential development parcel immediately to the west of the employment area. The alternative access point to this residential development parcel would be via the residential parcel immediately to the west. However, this would involve the partial removal of an existing hedgerow, a section of which is to be removed as part of the North Bexhill Access Road proposals. On balance therefore it is considered important to minimise the severance of this existing hedgerow.
- The additional residential development parcel located to the west of Watermill Lane is shown to be accessed via the North Bexhill Access Road to the north. This new access point would have to pass through an area of open space which is to otherwise be left undeveloped. It is acknowledged the development of the North Bexhill Access Road is likely to reduce the landscape quality of this open space. However, on balance in this Development Option it is considered that it should remain undeveloped, except for a new road providing access to the residential parcel, due to the potential ecological value of this part of the Study Area.

3.7.3 Green Infrastructure

The principles of green infrastructure remain the same as Option 1 apart from the inclusion of an additional parcel of residential development immediately to the west of Watermill Lane. This additional parcel of development has been shaped to maintain the integrity of the proposed linear open space running along the adjacent watercourse/Combe Haven.

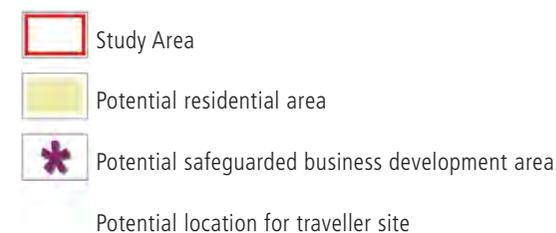
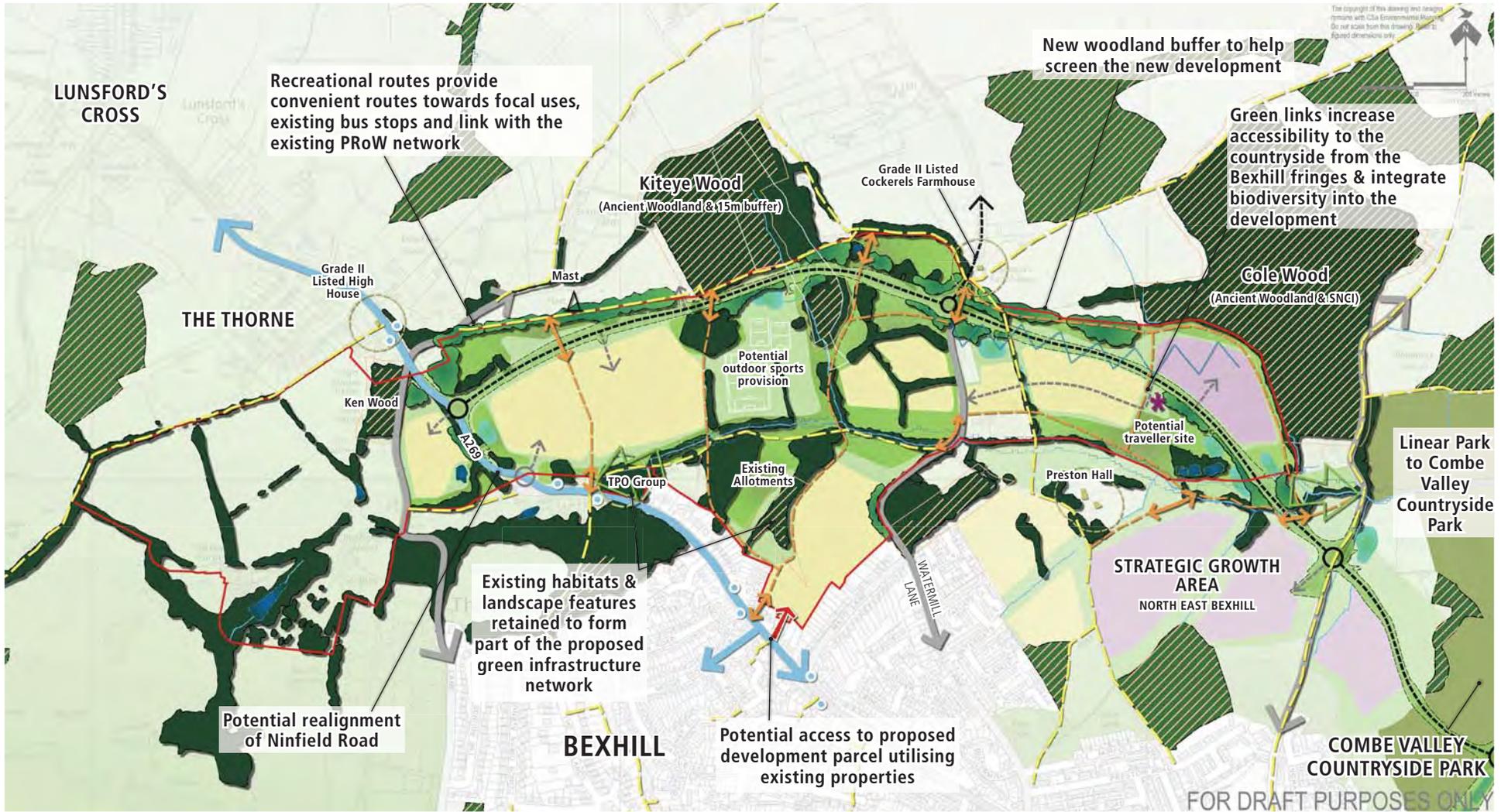


Figure 3.4: Development Option 2



- | | | | | | |
|----------------------------------|--------------------------------|-----------------------------------|------------------------------------|-------------------------------------|-------------------------|
| Potential open space | Existing bus route & bus stops | Existing Public Rights of Way | Existing trees and woodland | Potential linear green park | Telecommunications mast |
| Habitat enhancement | Existing vehicular routes | Potential pedestrian/cycle routes | Ancient Woodland & 15 metre buffer | Existing watercourses & waterbodies | Existing ridgeline |
| Playing pitch provision | North Bexhill Access Road | Key pedestrian linkages | Existing Ghyll Woodland | Extent of fluvial flooding | Listed Buildings |
| Potential principal access roads | | | Tree Preservation Order | | |

3.8 Development Option 3

Option 3 accommodates the following quantum of development:

- Residential development: 22.50 hectares / 630 dwellings
- Business development: 2.50 hectares / 6,500 sq.m business floorspace

3.8.1 General Design Principles

Option 3 follows the structure and spatial masterplanning principles established by Option 2, albeit it comprises the inclusion of additional residential development land to the west of St. Mary's Lane and Ken Wood and to the north of the new A269 roundabout.

3.8.2 Access

The principles of access remain the same as Option 2 except for the inclusion of an additional access point from St. Mary's Lane to serve the potential residential development land located to the west of Ken Wood.

3.8.3 Green Infrastructure

The principles of green infrastructure remain the same as Option 2 for the majority of the Study Area. However, the inclusion of residential development land in the westernmost part of the Study Area would allow for the logical inclusion of public open space to be brought forward extending south westwards from Ken Wood creating a continuous area of publicly accessible green infrastructure extending in an east to west direction across the entire Study Area.

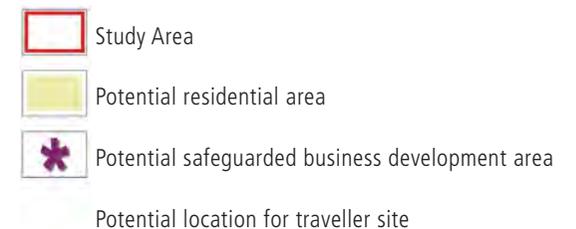
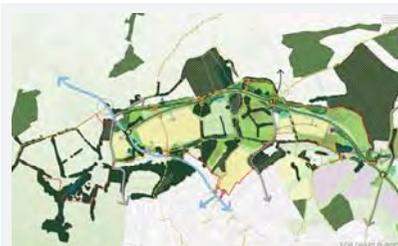


Figure 3.5: Development Option 3

3.9 Summary

This chapter has established three potential Development Options (see below) which illustrate how the Study Area could be developed for new housing ranging from 420 to 630 new dwellings and new business development of 6,500sq.m of business floorspace. All three Development Options adhere to the guiding principles of development established in the previous chapter.

The following chapter comprises the Sustainability Assessment of the three Development Options to identify the most sustainable option.



Development Option 1

- Up to 420 dwellings accommodated on 15.00 hectares of residential development land
- Approximately 34.50 hectares of green infrastructure
- A site for Gypsies and Travellers is also accommodated on the Development Option



Development Option 2

- Up to 480 dwellings accommodated on 17.20 hectares of residential development land
- Up to 6,500sq.m of new business floorspace accommodated on 2.50 hectares of potential safeguarded business development land
- Approximately 30 hectares of green infrastructure
- A site for Gypsies and Travellers is also accommodated on the Development Option



Development Option 3

- Up to 630 dwellings accommodated on 22.50 hectares of residential development land
- Up to 6,500sq.m of new business floorspace accommodated on 2.50 hectares of potential safeguarded business development land
- Approximately 44 hectares of green infrastructure
- A site for Gypsies and Travellers is also accommodated on the Development Option









Chapter 4

Sustainability Appraisal of North Bexhill Development Options

Sustainability Appraisal of North Bexhill Development Options

4.1 Introduction

What is a Sustainability Appraisal?

Sustainability Appraisal (SA) is a requirement of the Planning and Compulsory Purchase Act 2004, with Strategic Environmental Assessment (SEA) deriving from the European Union Directive 2001/42/EC. It is common practice in the UK to combine the two processes into one, which is referred to as Sustainability Appraisal (SA). This process incorporates the requirements of the SEA Directive.

SA is a tool used to ensure that the principles of sustainable development are fully taken into account when preparing development plans (in this case the Rother District Local Plan 2011-28). The overall aims of the SA are as follows:

- Make the Development Plan Document (DPD) as sustainable as possible by integrating sustainable development into the strategy making process, influencing all stages of plan development.
- Provide a high level of environmental protection and balance environmental, economic and social considerations in the plan's preparation.
- Consult on the SA process at various stages to allow the public and stakeholders to input into its production.
- Provide an environmental, social and economic audit.

The Council is required by law to produce a SA (incorporating Strategic Environmental Assessment (SEA)) for all of its Local Plan (2011-2028) documents except for the Statement of Community Involvement, the Annual Monitoring Report, Supplementary Planning Documents (SPDs) and the Local Development Scheme.

So far, several SA reports have been produced supporting Part One of the Rother District Local Plan (2011-28) – the Core Strategy. The documents in question can be found here <http://www.rother.gov.uk/sa>

The Council have prepared a SA, the 'Sustainability Appraisal Scoping Report', to inform Part Two of the Local Plan (2011-2028) – the Rother District Development and Site Allocations DPD (DASA). The Sustainability Appraisal Scoping Report, which was published in March 2015, sets out the framework for undertaking a SA.

4.2 Purpose of the Sustainability Appraisal

The purpose of this SA is to ‘test’ the Development Options to see whether they would have positive or negative effects when assessed against the SA Framework set out in the Sustainability Appraisal Scoping Report. The SA Framework takes the form of a set of objectives including minimising landscape impact, conserving and enhancing biodiversity, maximising accessibility to green infrastructure, ensuring integration with the existing settlement edge and minimising flood risk. All of the objectives and the type of criteria we consider are set in this chapter.

This SA helps to understand which of the Development Options or combination of the Development Options presents the most sustainable option for accommodating future development at North Bexhill and that any negative effects identified can be appropriately overcome. The implementation of the SA also helps to ensure compliance with the strategy for new residential and business development in Bexhill established by Policy BX3 (Development Strategy) of the Rother Local Plan Core Strategy.

A Sustainability Appraisal (SA) is the process used to assess the environmental, economic and social impacts of a proposal or policy within a plan. The SA ensures that plans are sustainable and that any negative effects identified can be appropriately overcome.

4.3 Sustainability Appraisal Framework

The Sustainability Appraisal Scoping Report contains the Council’s current SA Framework. The SA Framework contained in the Scoping Report was updated as a consequence of the Council now being in the process of preparing Part 2 of the Local Plan (2011-2028) – the ‘Development and Site Allocations Plan’. The updated SA Framework reflects current plans and policies, current baseline evidence/information and also the site specific nature of Part 2 of the Local Plan.

The Framework is developed as a basis for consideration of sites in the Rother District area. Therefore, it is relevant and applicable to the assessment of the North Bexhill Development Options.

The objectives of the SA Framework are sub-divided into environmental, economic and social issues. For sites and Development Options that are considered to be less reasonable options, this enables a more streamlined assessment based upon these three broad criteria. The SA Framework can be seen at **Table 4.1**.

4.4 SA Framework for North Bexhill Development Options Framework

SEA Directive Topics: Population, Human Health		
SA Objective	Decision-Aiding Questions	Indicators
<p>Social / Economic</p> <p>1</p> <p>Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home</p>	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Deliver affordable, sustainable housing in both urban and rural areas • Deliver development that is in keeping with local character • Deliver development to meet local housing need • Support sympathetic accommodation of housing growth in sustainable locations • Balance housing delivery with community facilities and environmental capacity • Provide for an appropriate mix and range of housing where it is needed • Appear likely to be viable, particularly in order to ensure the required proportion of affordable housing is achievable • Ensure new development is designed so as to make good quality place for people to live • Provide an opportunity for sustainable building • Incorporate an appropriate housing mix (i.e. meeting identified need for 1 & 2 bed properties in rural areas) • Meet any identified needs for specialist (e.g. older persons) housing 	<ul style="list-style-type: none"> • Average property price : earnings ratio • Delivery of affordable units • Number of completions • Number households on housing register • Total homeless in priority need

Figure 4.1: The SA Framework Plan

SEA Directive topics: Human Health

SA Objective	Decision-Aiding Questions	Indicators
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Social	2	<p>Improve the health and well-being of the population and reduce inequalities in health</p>	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Provide good access to health care and facilities (GP surgeries, dentist, hospitals) • Protect and, where appropriate, increase provision of, and access to, leisure including natural green space, cultural activities, open space and recreation facilities • Promote physical activity and vibrant neighbourhoods. Have scope and potential to increase accessibility to open space, recreation facilities via on-site provision to support healthy lifestyles • Have scope and potential for on-site provision of health facilities (where appropriate) • Have scope and potential to create or enhance walking and cycling routes, both on-site and off-site, to enhance healthy lifestyles • Access the PROW network • Add to or improve PROW network • Avoid adverse impacts of noise pollution, especially at night • Avoid proximity to landfill, contamination, industrial, and other polluting neighbours • Promote sites in proportion to the scale of the settlement, facilitating integration of new residents 	<ul style="list-style-type: none"> • Death rates • Life expectancy • Percentage of people with limiting long term illness • % new development within 30 minutes public transport of a GP and Hospital • Access to natural or semi natural green space
	3	<p>Reduce crime and fear of crime</p>	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Reduce actual levels of crime • Reduce fear of crime • Ensure sites are designed in such a way as to reduce crime and fear of crime • Incorporate a degree of informal surveillance/overlooking • Have a reasonable proximity to a police station 	<ul style="list-style-type: none"> • Recorded crime rates(by type) in Rother • IMD score (crime)

SEA Directive topics: Population, Human Health		
SA Objective	Decision-Aiding Questions	Indicators
Social / Economic	<p>4</p> <p>Reduce deprivation and social exclusion</p>	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Reduce poverty and social exclusion in those areas most affected • Reduce the number of children living in poverty • Reduce the number of households in fuel poverty • Promote development with good proximity to facilities, services and schools • Promote effective integration with existing communities and external development • Provide for affordable housing • Provide for an appropriate housing mix
Social / Economic	<p>5</p> <p>Raise educational achievement levels and develop the opportunities for lifelong learning</p>	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Increase the numbers of school-leavers achieving GCSE passes • Increase numbers undertaking further and higher education • Enhance opportunities for adult education • Have good accessibility to schools, colleges, universities, lifelong learning, and libraries

SEA Directive topics: Population, Human Health		
SA Objective	Decision-Aiding Questions	Indicators
<p>Economic</p> <p>6</p> <p>Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities</p>	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Stimulate economic growth, particularly in priority regeneration areas • Provide a diverse range of jobs that meets local needs • Support the rural economy • Ensure the correct mix of skills to meet the current and future needs of local employers • Increase provision of better quality jobs / skilled employment • Support increased employment in low impact sectors • Provide on-site employment opportunities • Develop with good access to existing and planned employment opportunities · • Support economically active, especially high skilled, residents to stay or move locally • Promote a sustainable and buoyant tourism sector, including by fostering heritage based tourism/regeneration and or eco-tourism where appropriate. • Avoid negative impact upon economic, tourist or heritage assets 	<ul style="list-style-type: none"> • % unemployed for more than 1yr • Unemployment as % of population • GVA per person • Number of VAT registered business • Amount of land for employment • Loss of employment land to retail • Permissions for B class uses • Tourism business turnover • Tourism visitor numbers • Broadband speeds

SEA Directive Topics: Population, Material Assets, Air, Climate Factors

SA Objective		Decision-Aiding Questions	Indicators
Social	7 Improve accessibility to services and facilities for all ages across the District	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Have good access to shops, services, educational and medical facilities, pubs, community hall, play areas, sports pitches, places of worship, library, nursery, petrol filling station. • Have scope to facilitate the above via on or off-site provision. • Improve accessibility, particularly in the rural areas of the District • Support delivery of quality public transport • Enhance the PRow and cycle network • Support the timely delivery of infrastructure needs associated with new development • Encourage the provision of services and facilities in accessible locations • Help support the continued viability of services, particularly in rural areas 	<ul style="list-style-type: none"> • Distance to key services • % new development within 30 minutes public transport of: <ul style="list-style-type: none"> • GP • Hospital • Primary & secondary school • Employment - Major retail centre • % completed retail, office & leisure development in centres

SEA Directive topics: Human Health, Cultural Heritage

SA Objective		Decision-Aiding Questions	Indicators
Social / Economic	8 Encourage and facilitate increased engagement in cultural and leisure activities	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Improve accessibility to cultural and leisure activities • Afford good access to community facilities, such as community hall, play areas, sports pitches, places of worship, library, theatres, cinemas, galleries, etc • Have scope to facilitate the above via on or off-site provision • Increase the number of cultural enterprises / organisations in the District 	<ul style="list-style-type: none"> • Leisure centre users as a proportion of the population • Attendees at cultural/heritage events and sites • Visitors to De La Warr Pavilion • Participants in local sport • Access to natural and semi-natural green space

SEA Directive topics: Material Assets, Air, Climatic Factors, Biodiversity, Soil		
SA Objective	Decision-Aiding Questions	Indicators
Social / Economic 9 Improve efficiency in land use and encourage the prudent use of natural resources	Does the option/policy: <ul style="list-style-type: none"> • Use land in sustainable locations that has been previously developed in preference to greenfield sites • Re-use buildings and materials • Protect and enhance the best and most versatile agricultural land • Maximise potential for providing facilities, i.e. from larger sites • Apply suitable density standards to ensure the best use of developable land in appropriate locations • Have potential to layout site to maximise energy efficiency (e.g. solar gain) • Have availability of utility services on site (water, electricity, sewerage, etc) 	<ul style="list-style-type: none"> • % development on previously developed land • Vacant private sector dwellings returned to occupancy • Agricultural land classification

SEA Directive topics: Material Assets, Air, Climatic Factors, Human Health, Biodiversity		
SA Objective	Decision-Aiding Questions	Indicators
Environmental 10 Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	Does the option/policy: <ul style="list-style-type: none"> • Reduce the need for travel by car / lorry • Reduce the need to travel for commuting • Have access to public transport (buses, train services) and non-car modes to access services • Have access to pedestrian & cycle routes for localised leisure opportunities • Have highway capacity • Avoid impact on and from AQMA • Improve air quality • Not worsen or, where practicable, mitigate traffic congestion 	<ul style="list-style-type: none"> • Background levels of air pollutants • Number of AQMAs • Commuting patterns in/out District • Mode of travel to work • % PRoW signposted & easy to use

SEA Directive Topics: Climatic Factors, Material Assets		
SA Objective	Decision-Aiding Questions	Indicators
Environmental 11 Reduce emissions of Greenhouse gases	Does the option/policy: <ul style="list-style-type: none"> • Reduce emissions through reduced travel, energy consumption • Promote renewable energy generation • Promote community involvement, understanding & action on climate change • Help reduce greenhouse gas emissions through reducing car travel • Have scope and potential to create or enhance walking and cycling routes, both on-site and off-site, to provide alternatives to car travel • Promote reduced energy use in new development (waste management and reduce energy demand from non-renewable resources) • Have potential for energy generation from renewable resources, including micro-generation as part of the energy requirements of new development • Have potential to maximise passive solar gain • Net Loss / Gain of Trees 	<ul style="list-style-type: none"> • Emissions of greenhouse gases • % new development with renewable energy generation • Renewable Energy capacity installed by type

SEA Directive Topics: Climatic Factors, Material Assets, Water, Human Health

SA Objective		Decision-Aiding Questions	Indicators
Environmental	12 Minimise the risk of flooding and resulting detriment to people and property	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Reduce the proportion of properties at risk of flooding in the District • Avoid locations within flood zones, including EA Flood zones, EA defined areas of surface water risk and SFRA identified issues of localised flooding • Ensure that appropriate flood risk protection measures are in place to protect well-being • Avoid exacerbating flood risk off-site by increasing run-off • Provide scope for, and promotion /adoption of SuDS 	<ul style="list-style-type: none"> • Properties at risk from flooding • Planning permissions granted contrary to EA advice on flood defence grounds

SEA Directive Topics: Water, Human Health, Material Assets, Climatic Factors

SA Objective		Decision-Aiding Questions	Indicators
Environmental	13 Maintain, improve and manage water resources in a sustainable way	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Protect & improve water quality (groundwater and surface water) • Require the use of water efficiency measures • Minimise the risk of pollution to water sources • Avoid locations within groundwater source protection zones/ aquife • Hydrological catchment area issues (identified in HRA) • Ensure new development has sufficient sewerage and waste water treatment capacity to avoid harm to water quality • Implement SuDs where appropriate to avoid run-off of polluted water to water courses or aquifers • Ensure any SuDS includes scope to enhance and enrich habitats and amenity value 	<ul style="list-style-type: none"> • Water consumption per household • Quality of river water • Rivers of High or Good chemical and biological water quality (passing Water Framework Directive criteria) • Bathing quality at beaches

SEA Directive Topics: Biodiversity, Flora, Fauna		
SA Objective	Decision-Aiding Questions	Indicators
<p style="text-align: center;">Environmental</p> <p style="text-align: center;">14</p> <p>Conserve and enhance biodiversity and geodiversity</p>	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Protect and enhance designated and locally valued habitats and species • Prevent and, where appropriate, reverse habitat fragmentation • Provide opportunities for provision & enhancement of green space / green infrastructure • Establish or maintain a network of protected areas to maintain both the distribution and abundance of threatened species and habitats • Avoid proximity harm to designated sites (international, national, local), with protection appropriate to their status • Avoid harm to Ancient Woodland • Avoid harm to BAP Habitats • Avoid harm to Rare & Protected species and their habitats • Have scope to mitigate and enhance habitats • Acknowledge and protect important trees, particularly mature specimens and TPOs • Acknowledge proximity to Biodiversity Opportunity Areas and scope to develop opportunities. • Avoid net loss of biodiversity • Avoiding damaging impacts to geo-diversity • Ensure the location and design of sites does not cause the further fragmentation of habitats and protects and enhances network routes for flora and fauna movement • Support landscaping that enhances native biodiversity • Have a positive nature conservation plan 	<ul style="list-style-type: none"> • Number & area designated sites • Condition of designated sites including SSSI in favourable, unfavourable recovering, unfavourable declining and unfavourable • Number and area of Local Sites • Area of ancient semi-natural Woodland • No further losses of ancient woodland from 2004 baseline • Area of Biodiversity Action Plan habitat – gains or losses over time • Loss of hedgerows <ul style="list-style-type: none"> • Number of Tree Preservation Orders (TPOs) in place

SEA Directive Topics: Landscape, Cultural Heritage, Soils		
SA Objective	Decision-Aiding Questions	Indicators
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Environmental</p> <p>15</p> <p>Protect and enhance the high quality natural and built environment</p>	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Ensure protection and enhancement of the AONB and respect the key features and characteristics of the High Weald AONB and its setting • Protect, enhance and avoid negative impacts upon sites & features of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled ancient monuments, registered battlefields, archeologically sensitive areas (ASAs)) • Minimise adverse visual impact on landscape setting of towns and rural settlements • Respect the historical settlement context • Promote development in character with the area • Seek to ensure that development is in keeping with the landscape character, including National and Local Landscape Character Areas • Avoid negative impacts on coastal and marine environment including seascapes, protected marine areas and undeveloped coast • Protect of gaps and avoid the coalescence of settlements • Promote development that is in scale and proportionate to host settlement • Ensure building design, arrangement and materials used complement and add to character of area • Promote sites that are well planned or soft landscaped in such a way as to positively enhance the environment. 	<ul style="list-style-type: none"> • Number of Conservation Areas • Number of Listed Buildings • Number of Registered Parks and Gardens • Listed Buildings of Grade I and II* at risk • Scheduled Ancient Monuments at Risk • % of Listed Buildings at risk • % of SAMs at risk • % of Registered Parks and Gardens at risk • % of Conservation Areas at risk • % of Conservation Areas with an up-to-date character appraisal • Landscape character assessment (qualitative, contextual) <ul style="list-style-type: none"> • % of businesses within the High Weald that are landbased (in comparison to the wider south-east)

SEA Directive Topics: Material Assets Environmental		
SA Objective	Decision-Aiding Questions	Indicators
Environmental 16 Reduce waste generation and disposal, and achieve the sustainable management of waste	Does the option/policy: <ul style="list-style-type: none"> • Help reduce waste and facilitate recycling in construction and operation • Encourage composting • Encourage development self-sufficient in waste management • Support recovery of energy from waste • Have good proximity to a household waste facility • Have good proximity to a 'bring' recycling point. 	<ul style="list-style-type: none"> • Tonnage & % of recycled household waste • Waste collected per person (kg) • % change in household waste collected per year • % household waste composted • % household waste landfilled

Potential Mitigation	Potential to mitigate negative effects and enhance positive effects
Cumulative and Synergistic Affects	Above factors may interact in a synergistic way and may increase cumulative affects either positively or negatively
Site Conclusions	Derived from above factors
Overall Settlement Commentary	Draw out key points that have led to the above conclusions, with particular reference to cumulative and synergistic factors

4.5 Appraisal Methodology

The Sustainability Appraisal centres on the consideration of the Development Options established in the previous chapter of this report. In summary, these Development Options are as follows:



Development Option 1

- Up to 420 dwellings accommodated on 15.00 hectares of residential development land
- Approximately 34.50 hectares of green infrastructure
- A site for Gypsies and Travellers is also accommodated on the Development Option



Development Option 2

- Up to 480 dwellings accommodated on 17.20 hectares of residential development land
- Up to 6,500sq.m of new business floorspace accommodated on 2.50 hectares of potential safeguarded business development land
- Approximately 30 hectares of green infrastructure
- A site for Gypsies and Travellers is also accommodated on the Development Option



Development Option 3

- Up to 630 dwellings accommodated on 22.50 hectares of residential development land
- Up to 6,500sq.m of new business floorspace accommodated on 2.50 hectares of potential safeguarded business development land
- Approximately 44 hectares of green infrastructure
- A site for Gypsies and Travellers is also accommodated on the Development Option

The appraisal involves assessing the performance of each Development Option against each SA objective using the decision-aiding questions as a basis of the assessment. The appraisal is a qualitative exercise based upon the professional judgement of CSA Environmental taking into account the information gathered in the North Bexhill Landscape and Ecological Study and other available background information.

The impact of each Development Option on each objective is defined as per the criteria set out in Table 4.5. It is not considered necessary or useful to score the impacts in any greater detail due to the strategic land use nature of the options themselves and the dangers of 'false precision'. A summary is included for each set of options. This summary includes key issues arising, potential mitigation measures, source of uncertainty and assumptions in making the assessment. The completed appraisal matrices can be found in the Appendices.

Symbol	Likely effect against the SA Objective
✓	Potentially significant beneficial effect
⊙	Option supports this objective though it may only have a minor effect
○	1. Policy has no effect 2. Effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the assessment at this stage
⊗	Option appears to conflict with the objective and may result in minor adverse effects
✗	Potentially significant adverse effect

Figure 4.2: Appraisal Scoring Symbols

4.6 The North Bexhill Access Road

All three Development Options are reliant on the North Bexhill Access Road to provide access to the development at North Bexhill. The spatial masterplan for each Development Option shows indicative principles of access from the North Bexhill Access Road to the proposed residential and potential safeguarded business development areas. However, further investigations will be required to ascertain the feasibility of accessing the proposed development parcels to ensure the deliverability of the chosen Development Parcel.

4.7 Sustainability Appraisal of Development Options - Option 1

Development Option	Sustainability Appraisal Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1	✓	✓	✓	✓	?	0	✓	✓	x	x	x	0	✓	0	x	x

NB: SA5 is not relevant to this Sustainability Appraisal and therefore cannot be appropriately assessed.

Development Option 1 delivers up to 420 dwellings (up to 126 affordable dwellings) accommodated on 15.00 hectares of residential development land. The Development Option also proposes 34.50 hectares of green infrastructure, including new playing fields, new recreational routes, SuDS features, the enhancement of existing landscape features, new areas of habitat creation and the creation of new traffic-free linkages to the Combe Valley Countryside Park. Such a significant increase in public open space in this part of Bexhill will have a positive impact on the health and well-being of both existing and new residents. A site for Gypsies and Travellers is also accommodated on the Development Option.

The Development Option's green infrastructure is based upon the retention of existing landscape features, including hedgerows and areas of woodland. This approach to the spatial layout of the Development Option creates logical parcels for new development, therefore allowing for the retention and enhancement of key habitat features and the retention and enhancement of linkages

between these habitat features. The Development Option creates generous areas of open space around these existing landscape features allowing sufficient space for appropriate mitigation and/or compensation measures to ensure there will be no net loss of biodiversity as a result of the new development.

The Development Option ensures the new housing areas, together with the planned new green infrastructure, are well-related with both the existing settlement edge and the planned residential and business development at North East Bexhill. This strong relationship is supported by utilising existing public footpaths (which could be upgraded to become combined pedestrian/cycle routes) and new recreational routes to provide direct connections between the existing and new areas of this part of Bexhill.

Development Option 1 is contained from the wider landscape to the north by the route of the North Bexhill Access Road, existing topography and existing landscaping in the form of the existing woodland and tree planting that lies to the north of the Study Area.

The proposed new built development retains the existing hedgerows and woodland, setting them in generous areas of open space that will offer scope to reinforce these existing landscape features, therefore helping to mitigate landscape impacts.

4.7.1 Opportunities to mitigate the potential minor adverse effects are:

- Secure appropriate provision or developer contributions for the delivery of measures to mitigate traffic impacts, and towards the costs of providing, community and social infrastructure, educational provision, open space/play areas and health care.
- Provide extended or additional bus services along the North Bexhill Access Road to increase the level of public transport serving the Development Option.
- Deliver new areas of hedgerow, tree and woodland planting to reinforce existing landscape features and therefore mitigate landscape impacts.
- Meet the objectives of the Biodiversity Opportunity Area (BOA). This includes protecting and enhancing existing wildlife habitats, and creating new wildlife habitats to ensure there is no net loss of biodiversity as a result of the new development.
- Maximise the use of on-site renewable energy and low carbon technologies as much as possible.
- Adopt a development that utilises sustainable layout principles to maximise passive solar gain, natural day lighting and the use of solar panels.
- Adopt sustainable waste management policies to minimise waste generation.

4.7.2 Further investigation, studies and public consultation required to include:

- Investigate the opportunity of either diverting existing bus services or providing new bus services along the North Bexhill Access Road in order to increase the level of public transport provision serving the Development Option.
- Undertake studies/dialogue and use public consultation to explore the potential community uses that should be delivered by the Development Option.
- Investigate whether the land ownership of the existing properties and field directly to the east of Watermill Lane allows for the delivery of a new recreational route and associated new public open space along the northern side of the Combe Haven in order to implement the green corridor link to the Combe Valley Countryside Park.
- Ascertain feasibility of accessing the proposed development parcels that require direct vehicular linkages from the North Bexhill Access Road and Ninfield Road.
- Investigate access to the proposed development parcels from Ninfield Road and if necessary, review feasibility of access direct from Watermill Lane.

4.8 Sustainability Appraisal of Development Options - Option 2

Development Option	Sustainability Appraisal Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 2	✓	✓	✓	✓	?	✓	✓	✓	✗	✗	✗	0	✓	✗	✗	✗

NB: SA5 is not relevant to this Sustainability Appraisal and therefore cannot be appropriately assessed.

Development Option 2 delivers up to 480 dwellings (up to 144 affordable dwellings) accommodated on 17.20 hectares of residential development land and 6,500sq.m of new jobs accommodated on 2.50 hectares of potential business development land, which equates to an additional 60 houses. The increase in dwelling numbers presents greater scope to meeting housing need, particularly through an increased provision of affordable dwellings. The potential safeguarded business development area has the same land take as that accommodated on Development Option 1. A site for Gypsies and Travellers is also accommodated on the Development Option.

This increase in residential development results in the provision of less green infrastructure. Even so, the green infrastructure is still significant in size measuring at 30 hectares and consequently it can also deliver the same mix of open space uses as Development Option 1, including the new open space corridors and recreational route linkages to the Combe Valley Countryside Park. This

provision of public open space is therefore considered to be sufficient in size to have a positive impact on the health and well-being of the existing and new communities.

Development Option 2 applies the same spatial layout principles as Development Option 1 by retaining existing landscape features to create logical development parcels located away from key habitat features, which allows for the retention and enhancement of linkages between these habitat features. Additionally, in common with Development Option 1, generous areas of open space around these existing landscape features will allow space for appropriate mitigation and/or compensation measures as a result of the new development. One of the key differences between the two Options is that Development Option 2 proposes to locate residential development directly to the west of Watermill Lane. This part of the Study Area is identified as having a grassland habitat that is potentially more diverse in comparison to other parts of the Study Area and therefore it is recommended in the Landscape and Ecology Study to

be retained where possible. It is recognised, therefore, that Development Option 2 is likely to have more impact on the ecological value of the Study Area as there is insufficient scope within the Development Option to appropriately mitigate the loss of the grassland habitat. This also means that the Development Option is unlikely to meet the BOA objective of ensuring no net loss of biodiversity as a result of the development.

The other key difference is that Development Option 2 locates the proposed business development to the north of the NBAR. As a consequence, Development Option 2 lacks the containment of development achieved by Development Option 1 and therefore, on balance, would have a slightly increased landscape impact, albeit not enough to be assessed as having a potentially significant adverse effect within the context of the SA objectives.

In common with Development Option 1, Development Option 2 creates a strong relationship with both the existing settlement edge and the planned residential and business development at North East Bexhill. Again, this strong relationship with the existing settlement edge is supported by utilising existing public footpaths and new recreational routes to maximise integration between the existing and new neighbourhoods in this part of the town.

As with Development Option 1, Development Option 2 is largely contained from the wider landscape by the route of the North Bexhill Access Road, existing topography and existing landscape features in the form of the existing woodland and tree planting that lies to the north of the Study Area. The proposed built development works around the existing hedgerows and woodland by setting them in generous areas of open space which offers scope to reinforce these existing landscape features to assist with mitigating landscape impacts.

4.8.1 **Opportunities to mitigate the potential minor adverse effects are:**

- Secure appropriate provision or developer contributions for the delivery of measures to mitigate traffic impacts, and towards the costs of providing, community and social infrastructure, educational provision, open space/play areas and health care.
- Provide extended or additional bus services along the North Bexhill Access Road to increase the level of public transport serving the Development Option.
- Deliver new areas of hedgerow, tree and woodland planting to reinforce existing landscape features and therefore mitigate landscape impacts.
- Protect and enhance existing wildlife habitats and create new wildlife habitats to ensure there is no net loss of biodiversity as a result of the new development.
- Maximise the use of on-site renewable energy and low carbon technologies as much as possible.
- Adopt a development that utilises sustainable layout principles to maximise passive solar gain, natural day lighting and the use of solar panels.
- Adopt sustainable waste management policies to minimise waste generation.

4.8.2 **Further investigation, studies and public consultation required to include:**

- Investigate the opportunity of either diverting existing bus services or providing new bus services along the North Bexhill Access Road in order to increase the level of public transport provision serving the Development Option.
- Undertake studies/dialogue and use public consultation to explore the potential community uses that should be delivered by the Development Option.
- Investigate whether the land ownership of the existing properties and field directly to the east of Watermill Lane allows for the delivery of a new recreational route and associated new public open space along the northern side of the Combe Haven in order to implement the green corridor link to the Combe Valley Countryside Park.
- Ascertain feasibility of accessing the proposed development parcels that require direct vehicular linkages from the North Bexhill Access Road and Ninfield Road.
- Investigate access to the proposed development parcels from Ninfield Road and if necessary, review feasibility of access direct from Watermill Lane.
- Undertake more detailed survey work of the land directly to the west of Watermill Lane identified to have a potentially more diverse grassland habitat in order to understand its ecological value.

4.9 Sustainability Appraisal of Development Options - Option 3

Development Option	Sustainability Appraisal Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 3	✓	✓	✓	✓	?	✓	✓	✓	✗	✗	✗	0	✓	✗	✗	✗

NB: SA5 is not relevant to this Sustainability Appraisal and therefore cannot be appropriately assessed.

Development Option 3 delivers up to 630 dwellings (up to 189 affordable dwellings) accommodated on 22.50 hectares of residential development land and 6,500sq.m of new business floorspace accommodated on 2.50 hectares of potential business development land, which equates to 170 more dwellings in than accommodated on Development Option 2. The increase in dwelling numbers presents greater scope to meeting housing need, particularly through an increased provision of affordable dwellings. The potential safeguarded business development area has the same land take as that accommodated on Development Option 2. A site for Gypsies and Travellers is also accommodated on the Development Option.

The increase in green infrastructure on Development Option 3 is achieved through the introduction new public open space associated with the residential development to the west of St. Mary's Lane. Development Option 3 therefore delivers a more extensive green corridor in comparison to Development Options 1 and 2, utilising existing public footpaths and new recreational routes

in order to make connections to the Combe Valley Countryside Park to the east. As with Development Options 1 and 2, the new green infrastructure delivers an exciting mix of open space uses, which have a positive impact on the health and well-being of the existing and new communities.

Development Option 3 has the potential to deliver approximately 44 hectares of green infrastructure. It follows the same spatial layout principles as Development Options 1 and 2, retaining existing landscape features which in turn define logical land parcels to accommodate new built development located away from the Study Area's key habitat features. As with Development Options 1 and 2, this approach allows for the retention and enhancement of the linkages between these habitat features and generous areas of open space to allow for appropriate mitigation and/or compensation measures. In common with Development Option 2, this option locates residential development directly to the west of Watermill Lane. This part of the Study Area is identified as having a grassland habitat that is potentially more diverse in

comparison to other parts of the Study Area and therefore it is recommended by the North Bexhill Landscape and Ecology Study to be retained where possible. The greater provision of green infrastructure on Development Option 3 may allow for the loss of this grassland habitat to be replaced in the new open space to the south and south west of Ken Wood. However, this area is remote from the existing grassland of value and therefore it is likely to be an unacceptable mitigation measure. On the basis that this mitigation measure is unacceptable, it is considered that this Development Option has a minor adverse effect on the Study Area's biodiversity value.

Also in common with Development Option 2, Development Option 3 locates the proposed business development to the north of the NBAR and therefore lacks the containment achieved by Development Option 1. As with Development Option 2, Development Option 3 will on balance have a slightly increased landscape impact in comparison to Development Option 1.

The majority of Development Option 3 creates a strong relationship with the existing settlement edge and the planned development at North East Bexhill. Again, this strong relationship is supported by utilising existing public footpaths and new recreational routes to maximise integration between the existing and new neighbourhoods in this part of the town. However, the Sustainability Appraisal highlights the remoteness of the proposed residential land located to the west of St. Mary's Lane, which does not possess a strong relationship with the existing settlement edge of Bexhill. It is also concluded that vehicular access to this residential development area is remote from the main development area. Furthermore, this access is likely to have to be taken from St. Mary's Lane which is unlikely to be able to accommodate additional traffic flows without significant modifications.

The Sustainability Appraisal also identifies that Development Option 3 results in coalescence with the adjoining settlement at The Thorne and Lunsford Cross due to the proposed residential development located both to the west of St. Mary's Lane and to the north of the A269 roundabout. As a result of this coalescence it is considered that Development Option 3 has a potentially adverse effect on landscape character.

4.9.1 **Opportunities to mitigate the potential minor adverse effects are:**

- Secure appropriate provision or developer contributions for the delivery of measures to mitigate traffic impacts, and towards the costs of providing, community and social infrastructure, educational provision, open space/play areas and health care.
- Provide extended or additional bus services along the North Bexhill Access Road to increase the level of public transport serving the Development Option.
- Deliver new areas of hedgerow, tree and woodland planting to reinforce existing landscape features and therefore mitigate landscape impacts.
- Protect and enhance existing wildlife habitats and create new wildlife habitats to ensure there is no net loss of biodiversity as a result of the new development.
- Maximise the use of on-site renewable energy and low carbon technologies as much as possible.
- Adopt a development that utilises sustainable layout principles to maximise passive solar gain, natural day lighting and the use of solar panels.
- Adopt sustainable waste management policies to minimise waste generation.

4.9.2 **Further investigation, studies and public consultation required to include:**

- Investigate the opportunity of either diverting existing bus services or providing new bus services along the North Bexhill Access Road in order to increase the level of public transport provision serving the Development Option.
- Undertake studies/dialogue and use public consultation to explore the potential community uses that should be delivered by the Development Option.
- Investigate whether the land ownership of the existing properties and field directly to the east of Watermill Lane allows for the delivery of a new recreational route and associated new public open space along the northern side of the Combe Haven in order to implement the green corridor link to the Combe Valley Countryside Park.
- Ascertain feasibility of accessing the proposed development parcels that require direct vehicular linkages from the North Bexhill Access Road and Ninfield Road.
- Investigate access to the proposed development parcels from Ninfield Road and if necessary, review feasibility of access direct from Watermill Lane and St. Mary's Lane.
- Undertake more detailed survey work of the land directly to the west of Watermill Lane identified to have a potentially more diverse grassland habitat in order to understand its ecological value.

4.10 Summary

This chapter has 'tested' the sustainability of the three Development Options for North Bexhill. This Sustainability Appraisal has provided a good understanding of the sustainability credentials of three Development Options, established a set of measures to mitigate the potential minor adverse effects and make a set of recommendations on further investigation, studies and public consultation required to help refine the chosen Development Option.

The following chapter draws upon the findings of the Sustainability Appraisal to recommend the Preferred Development Option.





Chapter 5

Recommendation:
Preferred Development Options

Recommendation: Preferred Development Options

5.1 Introduction

The previous chapter comprised the Sustainability Appraisal (SA) of the three Development Options that have been prepared for the Study Area. The SA 'tested' the Development Options to see whether they would have positive or negative effects when assessed against the SA Framework.

This chapter considers the results of the SA in order to formulate the recommendations on the preferred Development Option for North Bexhill. The preferred Development Option is illustrated within this chapter and is accompanied by supporting text which includes an indicative land use budget, an explanation of the key requirements and strategy for the development of North Bexhill.



5.2 Findings of Sustainability Appraisal and Recommendations of Preferred Development Option 1

Of the three Development Options assessed, Development Option 1 is found to be the most sustainable. Development Option 2 is found to be less sustainable than Development Option 1 as it proposed to locate residential development directly to the west of Watermill Lane in an area identified as having a grassland habitat that is potentially more diverse in comparison to other parts of the Study Area. The SA concludes that Development Option 2 is unlikely to be able to meet the BOA objective of ensuring no net loss of biodiversity as a result of the development due to a lack of available space within the Development Option to appropriately mitigate the loss of grassland habitat.

Development Option 3 is also found to have an unacceptable impact on the grassland habitat to the west of Watermill Lane and although it potentially has space to mitigate the loss of the grassland, the SA finds that the area for the replacement grassland is remote from the existing grassland and therefore constitutes an unacceptable mitigation measure which would lead to minor adverse effects on the Study Area's biodiversity value. The SA also highlights that in comparison to Development Options 1 and 2, Development Option 3 results in some of the residential development parcels being remote from the existing settlement edge of Bexhill, with consequential access issues. Critically, the SA finds that Development Option 3 results in the coalescence with the adjoining settlement at The Thorne and Lunsford Cross due to the proposed residential

development located both to the west of St. Mary's Lane and to the north east of the A268 roundabout. The SA concludes that this coalescence has a potentially adverse effect on landscape character.

Development Options 2 and 3 have also found to lack the containment of Development Option 1 as they both propose business development land to the north of the NBAR, resulting in, on balance, a slightly increased landscape impact. Given this potential impact, allied with the uncertainty over the need for further business development land (Section 3.5.2), it is considered that the preferred Development Option does not need to accommodate business development land. However, RDC does reserve the opportunity to review the suitability of the proposed business development land accommodated on Development Options 2 and 3 if the need for more business development land arises in the future.

Therefore, based upon the findings of the SA it is recommended that Development Option 1 forms the basis of the preferred Development Option for North Bexhill.

Development Option	Sustainability Appraisal Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1	✓	✓	✓	✓	?	0	✓	✓	x	x	x	0	✓	0	x	x
Option 2	✓	✓	✓	✓	?	✓	✓	✓	x	x	x	0	✓	x	x	x
Option 3	✓	✓	✓	✓	?	✓	✓	✓	x	x	x	0	✓	x	x	x

Figure 5.1: Results of the Sustainability Appraisal

5.3 The Preferred Development Option

In total, the preferred Development Option will provide up to 420 dwellings accommodated on around 15.00 hectares of residential development land. The preferred Development Option will also provide approximately 34.50 hectares of green infrastructure and a site for Gypsies and Travellers. Its development will provide new homes of good quality, type, size and tenure to meet local need, including a greater focus on larger, family housing. The new housing will be developed at a net dwelling density of 28 dph, which will allow the use of lower density forms to ensure the new homes appropriately address the Study Area's topography and to allow sufficient space for new vegetation and landscaping so that the new dwellings sit within a landscaped setting.

The preferred Development Option is well located in relation to the existing settlement edge of North Bexhill and to the North Bexhill Access Road. The North Bexhill Access Road will provide access to the new housing and provide a direct connection to the proposed business sites within the growth area at North East Bexhill to the south east. The preferred Development Option will be well-served by existing bus services along Ninfield Road and the opportunity may exist to introduce new bus services along the North Bexhill Access Road which would ensure all of the proposed development would be within easy walking distance of sustainable transport opportunities.

The incoming and existing residents in the area will both benefit from the new infrastructure opportunities afforded by the preferred Development Option. The most significant element of infrastructure will be the delivery of extensive new areas of public open space. These areas of open space have been structured to create a series of open space corridors connecting to larger areas of open space within the Development Option and eastwards to the Combe Valley Countryside Park. This new green infrastructure will deliver excellent opportunities to increase the provision of, and access to, leisure activities in the form of new natural green space, public open space and recreational facilities. These areas of public open space incorporate the existing on-site public footpaths. These public footpaths will be supplemented through the provision of new recreational routes to provide new connections with off-site public footpaths and new linkages between the new development, the existing settlement edge and the Combe Valley Countryside Park.

The preferred Development Option is illustrated by a Concept Framework (Figure 5.3) which illustrates the distribution of the principal land uses, principles of access and circulation and required areas of strategic landscape infrastructure. The Concept Framework has been informed by a thorough understanding of the key constraints, which follows both the preparation of the Landscape and Ecology Study and the 'testing' of the three original Development Options to see whether they have positive or negative effects when assessed against the Rother District SA Framework. This has led to robust evidence base which has helped to provide an understanding of the mitigation measures required to enable the development to be delivered. These mitigation measures are as follows:

- Secure appropriate provision or developer contributions for the delivery of measures to mitigate traffic impacts, and towards the costs of providing, community and social infrastructure, educational provision, open space/play areas and health care.
- Provide extended or additional bus services along the North Bexhill Access Road to increase the level of public transport serving the preferred Development Option.
- Deliver new areas of hedgerow, tree and woodland planting to reinforce existing landscape features and therefore mitigate landscape impact.

- Protect and enhance existing wildlife habitats, and create new wildlife habitats to ensure there is no net loss of biodiversity as a result of the new development.
- Maximise the use of on-site renewable energy and low carbon technologies as much as possible.
- Adopt a development that utilises sustainable layout principles to maximise passive solar gain, natural day lighting and the use of solar panels.
- Adopt sustainable waste management policies to minimise waste generation.

5.3.1 Green Infrastructure

The new green infrastructure (Figure 5.2) will be structured to allow for the retention of existing landscape features, including hedgerows and areas of woodland. This approach to the masterplanning of the preferred Development Option will create logical parcels for new development, allowing for the retention and enhancement of key habitat features and the retention and enhancement of linkages between these habitat features. The preferred Development Option creates generous areas of open space around these existing landscape features to allow for sufficient space for appropriate mitigation and/or compensation measures to ensure there would be no net loss of biodiversity as a result of the new development.

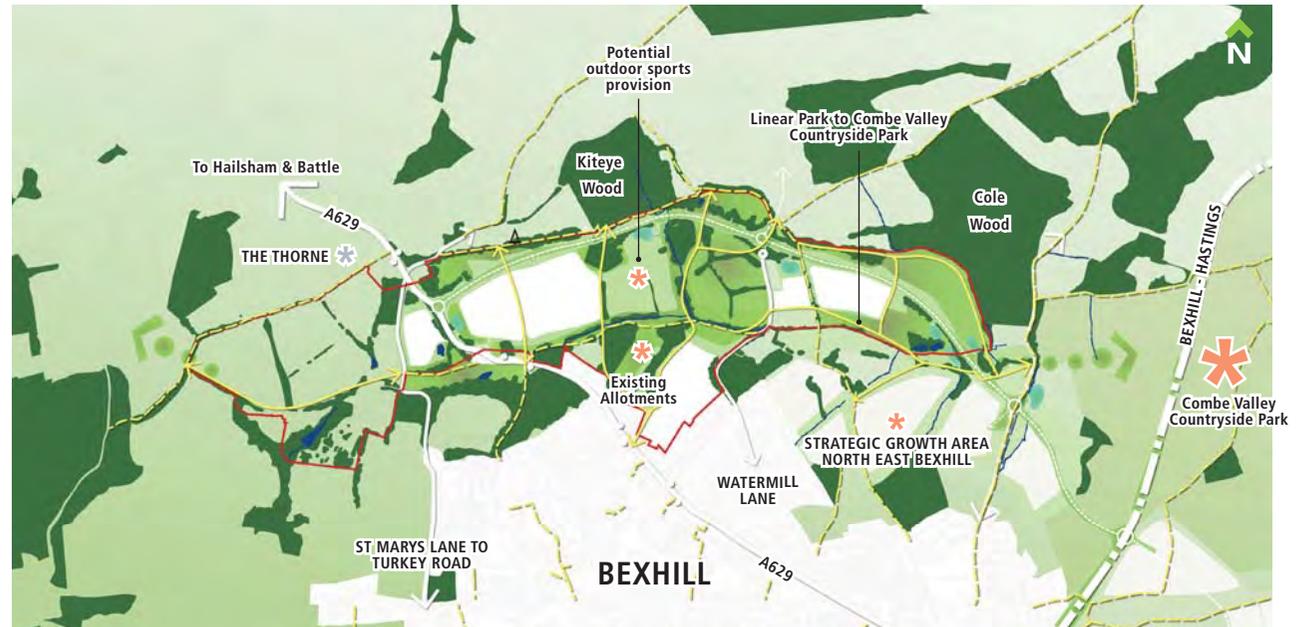
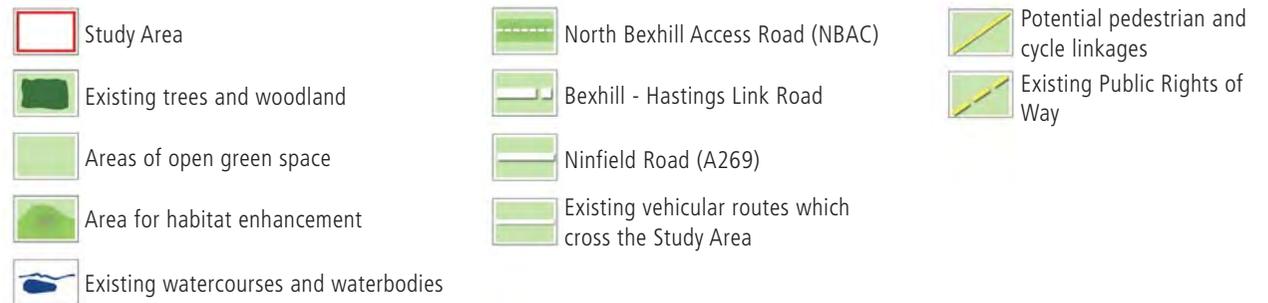


Figure 5.2: The preferred Development Option accommodates approximately 34.50 hectares of green infrastructure.



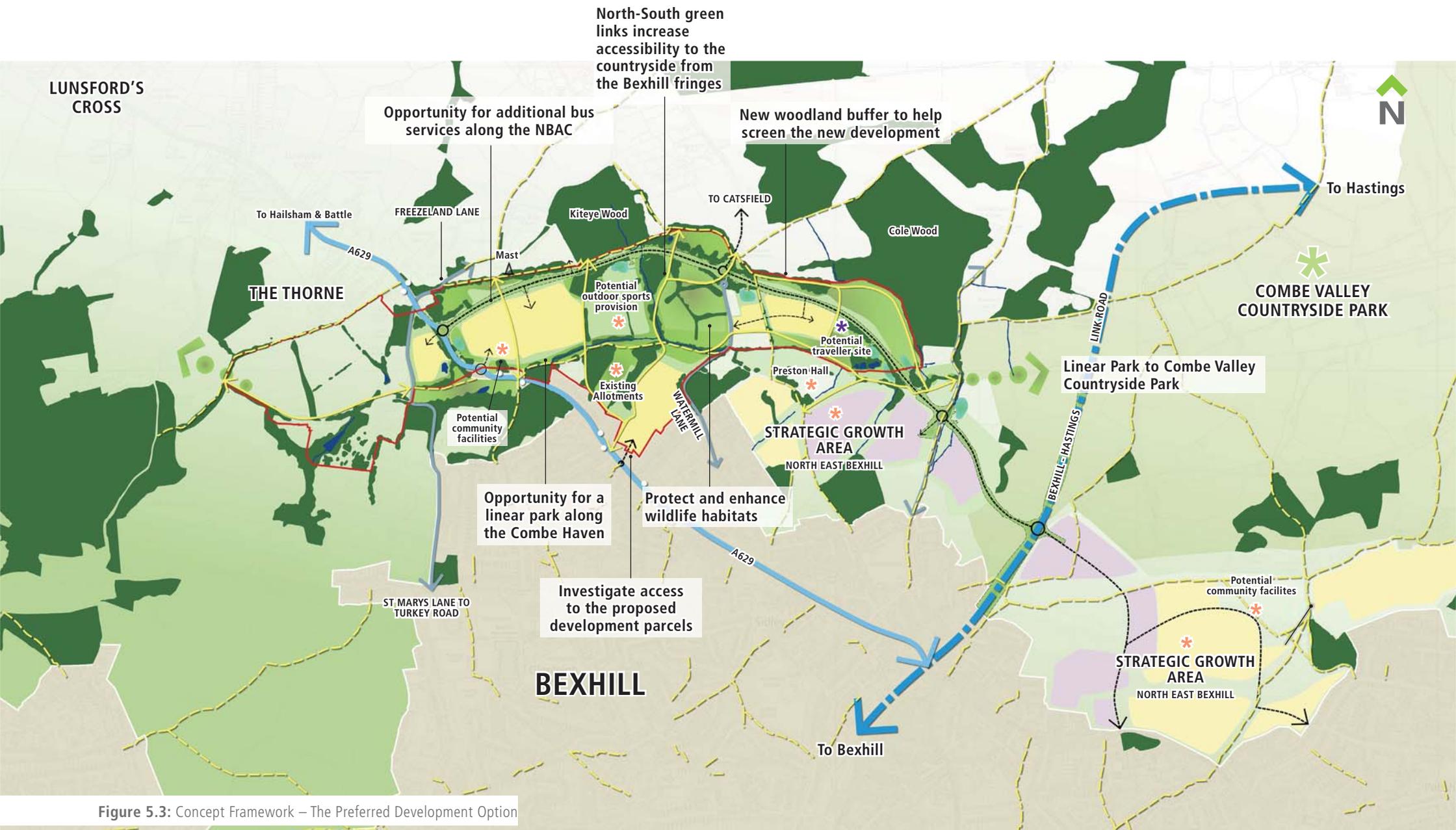


Figure 5.3: Concept Framework – The Preferred Development Option

-  Study Area
-  Potential residential area: **15.00ha** (Approximately 420 dwellings @ 28dph)
-  Potential location for traveller site: **0.2ha**
-  North Bexhill Access Road (NBAC)
-  Bexhill - Hastings Link Road
-  Ninfield Road (A269)
-  Existing vehicular routes which cross the Study Area
-  Existing Public Rights of Way
-  Potential pedestrian and cycle linkages

5.4 Recommendations For Further Work

The SA has also identified a number of further investigations, studies and public consultation required to fully understand how the preferred Development Option should be delivered and how its sustainability credentials should be maximised. These are as follows:

- Investigate the opportunity of either diverting existing bus services or providing new bus services along the North Bexhill Access Road in order to increase the level of public transport provision serving the preferred Development Option.
- Undertake studies/dialogue and use public consultation to explore the potential community uses that could be delivered by the preferred Development Option.
- Investigate whether the land ownership of the existing properties and field directly to the east of Watermill Lane allows for the delivery of a new recreational route and associated new public open space along the northern side of the Combe Haven in order to implement the green corridor link to the Combe Valley Countryside Park.
- Ascertain feasibility of accessing the proposed development parcels that require direct vehicular linkages from the North Bexhill Access Road and Ninfield Road and if necessary, review feasibility of access direct from Watermill Lane and Mayo Lane.

5.5 Conclusions/Recommendations

This chapter has considered the results of the SA in order to recommend the preferred Development Option for North Bexhill. The preferred Development Option accommodates up to 420 dwellings accommodated on around 15.00 hectares of residential development land. The preferred Development Option will also provide approximately 34.50 hectares of green infrastructure and a site for Gypsies and Travellers.

It will be important that the preferred Development Option is brought forward with the recommended mitigation measures, listed in this chapter, put in place to enable the development to be brought forward in a sustainable manner. It is also recommended that the further investigations, studies and public consultation listed in this chapter are undertaken in order to fully understand how the preferred Development Option should be delivered and how its sustainability credentials should be maximised.

The following chapter establishes a series of recommendations on how the preferred Development Option should be structured to maximise its integration with North Bexhill Access Road.

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Chapter 6

Recommendation:
Integration with new Local
Distributor Road

6.1 Introduction

The previous chapter recommended the preferred Development Option for North Bexhill. The preferred Development Option accommodates up to 420 dwellings, approximately 34.50 hectares of green infrastructure and a site for Gypsies and Travellers.

This chapter establishes a series of recommendations on the integration of the preferred Development Option with the North Bexhill Access Road. The preferred Development Option is illustrated by a Concept Framework (Figure 5.2) in the previous chapter. This Concept Framework illustrates the principles of access between the North Bexhill Access Road and the preferred Development Option. Therefore, this chapter focuses on the relationship of the proposed residential buildings with the North Bexhill Access Road.



Figure 6.1: Extract of approved proposals for the North Bexhill Access Road showing carriageway width and provision for footway and cycleway.

6.1.1 **Relationship of the NBAR with the preferred Development Option**

Moving eastwards from the A269 roundabout, the NBAR passes alongside the northern edge of the residential development parcel that lies to the east of Ninfield Road (A269). The NBAR then passes through the northern part of an area of green infrastructure to the Watermill Lane Roundabout. After the Watermill Lane roundabout the NBAR passes through a smaller area of green infrastructure before passing alongside the northern edge of a residential development parcel. The NBAR then continues in a south easterly direction through areas of open space before exiting the Study Area and on towards the Buckholt Lane roundabout.

6.1.2 Face the North Bexhill Access Road

The most fundamental requirement in structuring the built form alongside the NBAR is to make a clear distinction between the public fronts and the private backs. The new dwellings should front the NBAR to present their public face to the public realm and give life to it. In the case of where the residential development land abuts the NBAR, the new dwellings should therefore overlook the road with the rear gardens located within the development block behind.

6.1.3 Continuity of Frontage

It is recognised that it would not be appropriate to create continuous building lines along the NBAR due to the edge of settlement context and the need to locate sensitively designed parking areas to the sides of the buildings. However, an appropriate degree of continuity can be created with the use of walls, gates and other landscape features. Projections and set-backs from the main building line should also be employed to add emphasis, but the function of resulting spaces should have a clear purpose.

6.1.4 Quality of Architecture

The architectural design of the new dwellings overlooking the NBAR will be an extremely important consideration as they will mark the northerly approaches to Bexhill for not only road users, but for people approaching the town on foot from the existing public footpaths. The quality of the architecture in the parts of North Bexhill that overlook the NBAR should therefore exemplify high quality architecture that creates a distinct sense of place to North Bexhill, whilst drawing upon, but not slavishly recreating, local traditions of built form, materials and craftsmanship.

Architectural devices should be incorporated into the facades so that the buildings “reach out” to the NBAR”. Views out of the dwellings will put ‘eyes on streets’ and contribute to a safe public realm. Adding visual interest and animation to facades can be achieved by:

- Maximising the number of windows and doors onto the public realm.
- Enlivening edges with balconies, bays, porches and other projections.

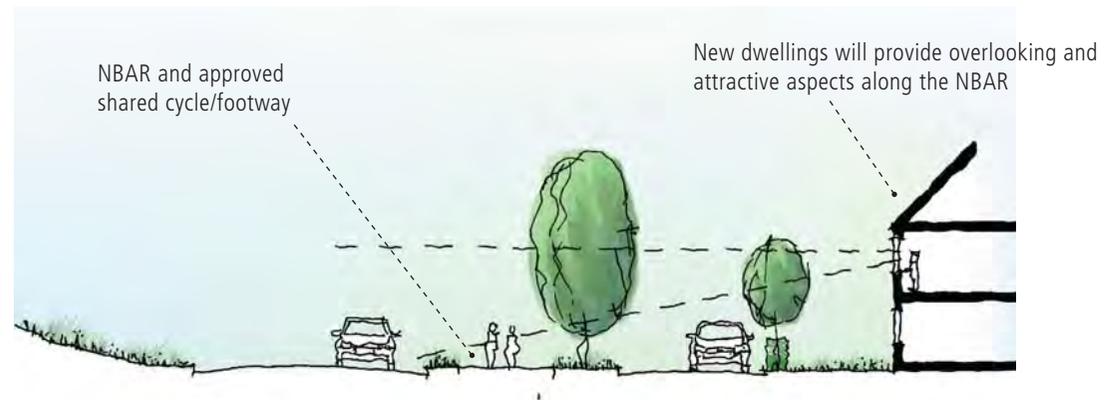


Figure 6.2: Illustrative section showing potential relationship of new housing with the North Bexhill Access Road.



6.1.5 Landscaping

New landscaping should be introduced between the NBAR and the new dwellings in order to frame and filter views from the road.

6.2 Summary

This chapter has established a series of recommendations on how the preferred Development Option should integrate with the NBAR. These recommendations set out that the new dwellings should front the road, that a high quality of architecture should be employed and that new landscaping should be introduced to create an appropriate interface between the new dwellings and the NBAR. It is advised that these recommendations should be expanded upon as part of a Supplementary Planning Document (SPD) that refines and elaborates on the North Bexhill allocation. The following chapter provides a summary of the findings and recommendations of this report.





Chapter 7

Summary and Conclusions

7.1 Summary and Conclusion

The North Bexhill Appraisal and Recommendations of Development Options report has been undertaken by consultants CAS Environmental on behalf of Rother District Council. The report identifies and assesses the potential development options for North Bexhill and recommends the preferred option for growth. The report also establishes a number of strategic design principles which set out how the new development at North Bexhill should integrate with the approved North Bexhill Access Road.

7.1.1 Formulating and Assessing the Development Options for North Bexhill

This report draws together the findings of the North Bexhill Landscape and Ecological Study to create a clear framework of strategic development principles that inform three Development Options for North Bexhill. These three Development Options illustrate how the Study can be developed for new housing ranging from 420 to 630 new dwellings and 6,500sq.m of new business floorspace. The sustainability credentials of each Development Option have been 'tested' against a set Sustainability Appraisal objectives, including minimising landscape impact, conserving and enhancing biodiversity, maximising accessibility to green infrastructure, ensuring integration with the existing settlement edge and minimising flood risk.

7.1.2 The Preferred Development Option

The findings of the Sustainability Assessment have been carefully considered, the results of which have led to the recommendation of the Preferred Development Option for North Bexhill which accommodates the following:

- Up to 420 dwellings accommodated on 15.00 hectares of residential development land.
- 34.5 hectares of supporting green infrastructure.
- A site for Gypsies and Travellers.

 Study Area

 Potential residential area: **15.00ha**

 Potential location for traveller site: **0.2ha**

 North Bexhill Access Road (NBAC)

 Bexhill - Hastings Link Road

 Ninfield Road (A269)

 Existing vehicular routes which cross the Study Area

 Existing Public Rights of Way

 Potential pedestrian and cycle linkages

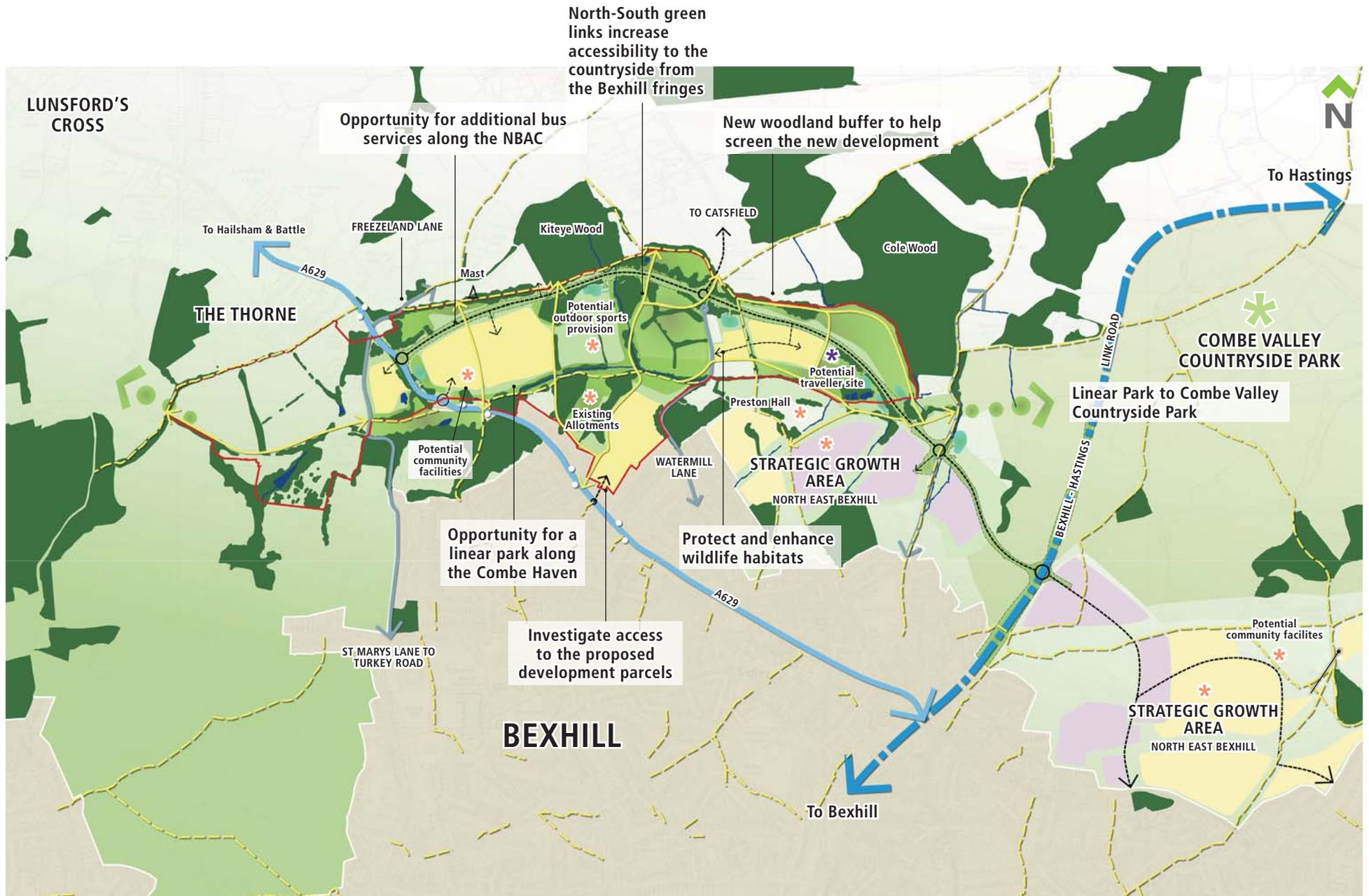


Figure 7.1: Concept Framework – The Preferred Development Option

The Sustainability Assessment process also provides a thorough understanding of the mitigation measures required to enable the development of North Bexhill to be brought forward in an appropriate and sustainable manner. These mitigation measures are as follows:

- Secure appropriate provision or developer contributions for the delivery of measures to mitigate traffic impacts, and towards the costs of providing, community and social infrastructure, educational provision, open space/play areas and health care.
- Provide extended or additional bus services along the North Bexhill Access Road to increase the level of public transport serving the preferred Development Option.
- Deliver new areas of hedgerow, tree and woodland planting to reinforce existing landscape features and therefore mitigate landscape impact.
- Protect and enhance existing wildlife habitats, and create new wildlife habitats to ensure there is no net loss of biodiversity as a result of the new development.
- Maximise the use of on-site renewable energy and low carbon technologies as much as possible.

- Adopt a development that utilises sustainable layout principles to maximise passive solar gain, natural day lighting and the use of solar panels.
- Adopt sustainable waste management policies to minimise waste generation.

This report has also established a series of recommendations on how the preferred Development Option should integrate with the North Bexhill Access Road. These recommendations set out that the new buildings should front the road, that a high quality of architecture should be employed and that new landscaping should be introduced to create an appropriate interface between the new buildings and the NBAR. It is recommended that these recommendations should be expanded upon as part of a Supplementary Planning Document (SPD) that refines and elaborates on the North Bexhill allocation.

7.2 Next Steps

Having established the Preferred Development Option for North Bexhill, this report identifies a number of further investigations, studies and public consultation required to fully understand how the Preferred Development Option should be delivered and how its sustainability credential should be maximised. These are as follows:

- Investigate the opportunity of either diverting existing bus services or providing new bus services along the North Bexhill Access Road in order to increase the level of public transport provision serving the preferred Development Option.
- Undertake studies/dialogue and use public consultation to explore the potential community uses that could be delivered by the preferred Development Option.
- Investigate whether the land ownership of the existing properties and field directly to the east of Watermill Lane allows for the delivery of a new recreational route and associated new public open space along the northern side of the Combe Haven in order to implement the green corridor link to the Combe Valley Countryside Park.
- Ascertain feasibility of accessing the proposed development parcels that require direct vehicular linkages from the North Bexhill Access Road and Ninfield Road.
- Investigate access options to the proposed development parcel that lies directly to the north west of Mayo Lane.

It is considered that these further investigations are addressed as part of a Supplementary Planning Document (SPD) that refines and elaborates on the North Bexhill allocation.

This report has been prepared to advise and assist RDC to consider the most appropriate form of development of the broad location for growth as set out in its Local Plan Core Strategy. It is now for the Council to consider the recommendations in this report for inclusion within its forthcoming Development and Site Allocations Plan, which it will need to consult widely on.





Appendices

Appendix A: Option 1 SA Matrix

Appendix B: Option 2 SA Matrix

Appendix C: Option 3 SA Matrix

Appendix A - Option 1 SA Matrix

SA Objective	Commentary
<p>SA1</p> <p>Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home</p>	<ul style="list-style-type: none"> • This Development Option would deliver 420 new dwellings, of which 126 dwellings would be for affordable tenures as per the provisions of Policy LHN2 (Affordable Housing) of the Rother Local Plan Core Strategy. There is sufficient scope within the design framework of the Development Option to accommodate an appropriate housing mix and meet any identified needs for specialist housing, whilst providing opportunities for sustainable buildings. • There have been no major constraints identified at this stage which might result in viability issues and potentially compromise the delivery of affordable housing on the site. • The Development Option puts forward a form of development that would be well-related to the existing settlement edge and the planned development at North East Bexhill. It therefore offers a location where the new homes would be physically connected to existing and allocated residential areas, allocated business development areas and the facilities these areas provide. The western and southernmost parts of the Development Option would be served by existing bus services along Ninfield Road, which provide connections with the wider area including Bexhill Railway Station (approximately 20 minute bus journey time). The relationship of the development parcels with the North Bexhill Access Road means that the introduction of any new bus services along the new road would ensure that the remainder of the Development Option would be well-served by public transport. • The Development Option would balance housing delivery with environmental capacity by avoiding the Study Area’s principal landscape and ecology features, such as the areas of existing woodland, hedgerows and watercourses. Therefore, the proposed form of development would retain the Study Area’s key ecological features/habitats and the connections between them. <p>Summary: The Development Option would deliver new housing, including affordable tenures in line with Rother District Council’s (RDC) affordable housing policies. The Development Option also ensures new housing would be related to the existing settlement edge, whilst appropriately balancing housing need with the Study Area’s environmental capacity. Therefore, it is considered the Development Option will have a potentially significant beneficial effect on the objectives of SA1.</p>



SA Objective	Commentary
<p>SA2</p> <p>Improve the health and well-being of the population and reduce inequalities in health</p>	<ul style="list-style-type: none"> The nearest health care facility is Sidley Surgery which is located approximately 500 metres to the south of the southernmost part of the Study Area. The furthest proposed residential development parcel would be located approximately 1,300 metres away from Sidley Surgery. The existing bus services along Ninfield Road presently serve bus stops located to Sidley Surgery. It is considered that there is sufficient scope within the Development Option to accommodate a new health care facility, if future investigations/studies identify that one is required. The Development Option has been structured to create a series of open space corridors connecting to larger areas of open space within the Study Area and eastwards to the Combe Valley Countryside Park. The areas of open space within the Development Option would offer excellent opportunities to increase the provision of, and access to, leisure in the form of new natural green space, public open space and recreational facilities. Key to this principle is the incorporation of the existing public footpaths and the provision of new recreational routes supplementing these existing rights of way. As a result, new connections would be created with off-site public footpaths and important new linkages established between the Development Option and the Combe Valley Countryside Park to the east. The Development Option ensures that the new residential development blocks would be closely related with the existing public footpaths and new recreational routes. The proposed network of open spaces within the Development Option would transform existing private land into generous new areas of public open space, therefore significantly increasing the level of public open space in the local area. The relationship of the Development Option with the existing settlement edge and the presence of new and existing recreational routes would mean these areas of new public open space would be highly accessible, therefore benefiting new and existing residents alike. These new areas of public open space would help to promote physical activity and support healthy lifestyles by providing new routes for walking, jogging and cycling, areas for informal sports games and new children's play facilities. It is considered that the Development Option would avoid adverse noise pollution and that noise generated from the North Bexhill Access Road can be appropriately mitigated at the detailed design stage. The Development Option avoids proximity to landfill, contamination, industrial and other polluting neighbours.
	<p>Summary:</p> <p>The Development Option is relatively remote from existing health care facilities in the town, although the existing bus services along Ninfield Road presently serve bus stops within close proximity of Sidley Surgery. However, it is considered there is sufficient scope within the Development Option to accommodate a new health care facility if one is required as a result of the new development at North Bexhill. Therefore, it is recommended that investigations should be carried out to ascertain the impacts of the new development on existing health care provision in the town and whether existing facilities should be extended or a new health care facility is provided on-site.</p> <p>The Development Option would significantly increase the level of public open space in this part of Bexhill to the benefit of the health and well-being of existing and new residents alike.</p> <p>As the Development Option would provide a significant increase in public open space and has the potential, if required, to provide a new health care facility, it is considered that the Development Option would have a potentially significant beneficial effect on the objectives of SA2. However, it is important to acknowledge that the land ownership of the existing properties and field directly to the east of Watermill Lane should be investigated to ascertain whether a new recreational route and new public open space along the northern side of the Combe Haven can be implemented to create the green corridor link to the Combe Valley Countryside Park.</p>



SA Objective	Commentary		
SA3	Reduce crime and fear of crime	<ul style="list-style-type: none"> Facilitating housing of all sectors of society, including disadvantaged groups, may help to reduce crime. The nearest police station (Bexhill Police Station) is located approximately 2.3km from the Development Option. It is considered therefore that the Development Option is within a reasonable proximity of the police station. The opportunity may exist to provide a community hall on-site (see also SA4). If so, the opportunity may also exist to incorporate a Sussex Police drop in/touch down facility within the centre. 	
		<p>Summary: The distance between the Development Option and the nearest police station is not considered to be an issue. It is recommended that dialogue with Sussex Police should be undertaken to ascertain whether the provision of a Sussex Police drop in/touch down facility (as part of a new community hall) could be a viable benefit of the new development. For these reasons, it is considered that the Development Option supports this objective, although it is likely to be only a positive minor effect.</p>	

SA Objective	Commentary
<p data-bbox="165 730 215 759">SA4</p> <p data-bbox="237 707 409 788">Reduce deprivation and social exclusion</p>	<ul data-bbox="456 272 1995 874" style="list-style-type: none"> • Generally, easier access to the housing market may help to reduce social deprivation and social exclusion. • The Development Option would deliver up to 131 affordable dwellings. It is envisaged that these new affordable homes would be of a type and size that would meet local need, with a tenure mix split between social rented and intermediate housing. It is also considered that the Development Option would provide specialist accommodation for older people, if required. • It is considered that the Development Option can be appropriately brought forward to achieve a size, type and mix of dwellings that will reflect both current and projected housing needs, including contributing to the increased provision of family dwellings as per Core Strategy Policy LHN1 (Achieving Mixed and Balanced Communities). • The provision of extensive areas of new public open space (including play facilities), together the potential to accommodate new community facilities, playing fields, such as a community hall, would help to reduce social exclusion by providing much needed community facilities. • The nearest primary schools are Glenleigh Park Primary Academy and All Saints C of E Primary School, which are located approximately 600m and 750m (as the crow flies) respectively from the southernmost part of the Development Option. The actual walking distance to both primary schools from the farthest part of the Development Option would be below the statutory walking distance of 2 miles for children under 81. The nearest secondary school is Bexhill High School, which is located 800m (as the crow flies) from the southernmost part of the Development Option. The actual walking distance to Bexhill High School from the farthest part of the Development Option would be below the statutory walking distance of 3 miles for children aged 8 and over¹. If required, it is considered that the Development Option could accommodate a new primary school, although this would likely have an impact on the total number of dwellings it could accommodate. • The Development Option puts forward a form of development that would be well-related to the existing settlement edge and the planned development at North East Bexhill. It promotes integration with the existing and emerging settlement edge by utilising both existing public footpaths and new recreational routes. The North Bexhill Access Road would also provide an important point of integration with North East Bexhill. <p data-bbox="456 935 562 959">Summary:</p> <p data-bbox="456 963 1995 1134">The Development Option may help to reduce deprivation and social exclusion through easier access to the housing market. The Development Option would deliver extensive new areas of public open space and presents the opportunity to deliver other community facilities, such as a community hall. It is considered that there is also scope to deliver a new primary school, if required, although this could have an impact on the overall quantum of residential development. It is recommended that further investigation is carried out to ascertain the impacts on current educational provision and whether the new development would generate the need for a primary school to be provided on-site. Similarly, it is recommended further investigation is undertaken to establish whether the development can address any existing shortfalls in community facility provision.</p> <p data-bbox="456 1171 1973 1225">For the above reasons, it is considered that the Development Option would support the objective of reducing deprivation and social exclusion, although it is likely to be limited to a positive minor effect.</p> <div data-bbox="2024 679 2074 724" style="text-align: right;">  </div>

¹ Section 444(5) of the Education and Inspections Act 2006

SA Objective	Commentary
SA5	<p data-bbox="232 280 445 456">Raise educational achievement levels and develop the opportunities for lifelong learning</p> <ul data-bbox="450 352 2011 379" style="list-style-type: none"> SA5 is not relevant to this Sustainability Assessment and therefore cannot be appropriately assessed. Accessibility to schools is assessed in SA4.

SA Objective	Commentary
SA6	<p data-bbox="232 738 445 970">Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities</p> <ul data-bbox="450 707 2011 834" style="list-style-type: none"> The construction of the Development Option's new homes would provide a number of economic benefits locally, including jobs linked directly to the construction of new development, jobs supported through the supply chain, additional retail expenditure generated by the new residents, additional Council Tax income and New Homes Bonus payments. It is considered that this Development Option avoids negative impacts upon economic, tourist or heritage assets. <p data-bbox="450 906 2011 994">Summary: The new housing would provide some limited economic benefits locally, including jobs related to the construction of the new homes. As the construction phase would be relatively short term the Development Option is likely to be neutral in respect of the economic objectives of SA6.</p>

SA Objective	Commentary
<p style="text-align: center;">SA7</p> <p style="text-align: center;">Improve accessibility to services and facilities for all ages across the District</p>	<ul style="list-style-type: none"> • The Development Option puts forward a form of development that would be well-related to the existing settlement edge and the planned development at North East Bexhill. It therefore offers a location where the new homes would be physically connected to existing and allocated residential areas, the allocated business development areas and the existing facilities these areas provide. These facilities include the existing sports ground at St. Mary's Lane, the district shopping/service centre at Sidley and the local schools. • It is considered that the Development Option would have scope to provide some local services on-site, such as a local shop, a doctor's surgery, nursery or community hall. The Development Option could also accommodate a new primary school, although this would likely have an impact on the total number of dwellings it could accommodate. Equally, the Development Option would be required to make contributions to help support and improve local infrastructure, including schools and highways. • The western and southernmost parts of the Development Option would be served by existing bus services along Ninfield Road, whilst the relationship of the development parcels with the North Bexhill Access Road means that the introduction of any new bus services along its route would ensure that the remainder of the Development Option would be well served by public transport. • The Development Option provides the opportunity to enhance the existing public footpath network within the Study Area. They could be appropriately surfaced to ensure year-round use and widened to accommodate cyclists. The Development Option also establishes how a network of new recreational routes could be extended to the existing public footpaths within the Study Area to create traffic-free connections to the Combe Valley Countryside Park and the existing public rights of way that abut the Study Area. • The implementation of the Development Option would secure appropriate provision or developer contributions for the timely delivery of infrastructure needs associated with the new development in accordance with Policy IM2 (Implementation and Infrastructure) of the Rother Local Plan Core Strategy and the latest Infrastructure Delivery Plan. • The timely delivery of the North Bexhill Access Road creates the basis for an accessible new development. The Development Option does not preclude the delivery of other local service and facilities within the most accessible parts of the development. • The delivery of up to 420 new dwellings and in the order of 189 new jobs would help to support the continued viability of services in the local area through direct and indirect jobs linked to the construction of the Development Option, additional retail expenditure locally and additional Council Tax and business taxes. <p>Summary: The Development Option puts forward a form of development that would be well-related to the existing settlement edge and the planned development at North East Bexhill. The Development Option also utilises the existing public footpaths and a network of new recreational routes to maximise accessibility to the existing and planned settlement edge and therefore the facilities provided within them. The Development Option would deliver the timely delivery of infrastructure needs associated with the development, not least the provision of new areas of public open space that would accommodate a range of new outdoor uses/facilities. However, at this stage the full scope community facility provision to be provided is not fully known. Therefore, it is concluded that the Development Option supports the objectives of SA7, although the benefits would be relatively limited in scope/scale and only have a minor effect.</p>



SA Objective	Commentary		
SA8	<p>Encourage and facilitate increased engagement in cultural and leisure activities</p>	<ul style="list-style-type: none"> • The new housing development is likely to increase the catchment (and demand) for cultural and leisure activities, and hence stimulate and facilitate activity. • The Development Option would secure the provision of approximately 34.50 hectares of green infrastructure that could be brought into the public realm. This green infrastructure has the potential to secure a range of leisure activities including providing new routes for walking, jogging and cycling, areas for informal sports games and new children’s play facilities. The connected network of open spaces established by the Development Option means that all the new homes would be within easy reach of these new facilities. • The Development Option would be well-connected to existing and new pedestrian/cycle routes which would provide links across the Study Area giving access to the Combe Valley Countryside Park and other areas of countryside. • The principles of vehicular access and pedestrian/cycle connectivity illustrated by the Development Option would create the basis for a well connected and permeable development that would afford good access to new community facilities. • Subject to viability, the Development Option would secure new green infrastructure and community facilities through appropriate provision or developer contributions in accordance with Policy IM2 (Implementation and Infrastructure) of the Rother Local Plan Core Strategy and the latest Infrastructure Delivery Plan. 	
		<p>Summary: The new development could increase the catchment for cultural and leisure activities in the town. The delivery of new public open space would assist in delivering new leisure activities, such as walking, cycle, sports pitches and children’s play area. As these benefits are generally limited in scope and scale, it is considered the Development Option would only have a minor effect on the objectives of SA8.</p>	

SA Objective	Commentary
<p>SA9</p> <p>Improve efficiency in land use and encourage the prudent use of natural resources</p>	<ul style="list-style-type: none"> • The Development Option would result in the loss of agricultural land within Grade 3 (Good to Moderate) and Grade 4 (Poor)³. The development of any land around the built up area of Bexhill is likely to include land of a similar grade. • The Development Option shows how significant new areas of public open space could be provided to form an important new community asset that would contain new recreational routes, sports pitches and children’s play areas. Critically, the Development Option would deliver new linkages to the Combe Valley Countryside Park. The Development Option also does not preclude the delivery of other community facilities such as a community hall, a doctor’s surgery or crèche. • The Development Option applies a density standard of 28 dph. This lower density form of development is dictated by the topography of the Study Area. • As the majority of the Study Area sits on a south facing slope, the existing topography would dictate, to an extent, the creation of an east-west street pattern. Such a street pattern would maximise the number of buildings that could be orientated broadly to the south. This would maximise the opportunity for daylighting, passive solar and the use of solar panels. • The construction of the North Bexhill Access Road will create a new ‘utilities corridor’ underneath which services such as water, electricity and sewerage will run in order to serve the Development Option. <p>Summary: The Development Option comprises the development of Greenfield land, which does not meet the objective of SA9 to use land that has previously been developed. Consequently, the Development Option would result in the loss of agricultural land within Grade 3 and Grade 4, although the development of any land around Bexhill is likely to include land of a similar scale. It is envisaged that the on-site topography would allow for a development form that maximise the number of dwellings that could be orientated to the south to maximise natural daylighting, passive solar gain and the use of solar panels. However, the ability to adopt sustainable/renewable energy practices does not fully outweigh the loss of Greenfield land and therefore the Development Option partially conflicts with SA9, resulting in minor adverse effects.</p>

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³As per 1:250 000 Series Agricultural Land Classification mapping prepared by Natural England. This map represents a generalised pattern of land classification grades and any enlargement of the scale of the map would be misleading. This map does not show subdivisions of Grade 3 which are normally mapped by more detailed survey work.

SA Objective	Commentary
<p data-bbox="163 655 226 679">SA10</p> <p data-bbox="241 523 427 815">Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage</p>	<ul data-bbox="461 276 2002 671" style="list-style-type: none"> • The close relationship of the Development Option with the North Bexhill Access Road means that the new housing would benefit from a direct connection to the Bexhill-Hastings Link Road, therefore minimising impacts on existing traffic levels within the area. The North Bexhill Access Road will provide direct and convenient connections to the business development that is planned at North East Bexhill. • The Development Option is well related to existing public footpaths, which could be upgraded to accommodate cyclists. The Development Option also accommodates a network of new recreational routes which would connect with these existing rights of ways. These new and existing routes would provide direct connections to the existing settlement edge, the adjacent countryside and the Combe Valley Countryside Park, which would encourage more sustainable movement patterns for local trips. • The western and southernmost parts of the Development Option would be served by existing bus services along Ninfield Road, whilst the relationship of the development parcels with the North Bexhill Access Road means that the introduction of any new bus services along its route would ensure that the remainder of the Development Option would be well-served by public transport. • The implementation of the Development Option is expected to secure appropriate provision or developer contributions for the delivery of measures to mitigate traffic impacts generated by the new development. <p data-bbox="461 708 566 732">Summary:</p> <p data-bbox="461 738 2002 850">The Development Option would result in an increase to traffic and associated pollution levels. However, the planned nature of a development of this size would allow required highway mitigation measures to be delivered in a planned and appropriate manner. The Development Option would also be well-related to the existing public footpaths and provide a number of new recreational routes that maximise the connections with the existing settlement edge, which would help to encourage more sustainable movement patterns for local trips.</p> <p data-bbox="461 887 2002 967">It is recommended that further investigation is carried out to ascertain the viability of either diverting existing bus routes or providing new bus routes routed along the North Bexhill Access Road to increase the level of public transport provision supporting the Development Option. The provision of bus services along the North Bexhill Access Road would help to minimise car usage associated with the new development.</p> <p data-bbox="461 1003 2002 1059">However, as the Development Option would increase traffic levels, albeit with the North Bexhill Access Road in place, it will not reduce road congestion and pollution levels in the wider area and therefore is considered to conflict with SA10, albeit it is likely to only result in minor adverse effects.</p>

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SA Objective	Commentary
<p data-bbox="159 568 219 592">SA11</p> <p data-bbox="237 539 427 624">Reduce emissions of Greenhouse gases</p>	<ul data-bbox="456 280 2002 528" style="list-style-type: none"> • The Development Option would be served by existing bus services and benefits from a number of existing and new pedestrian/cycle connections, which would help to encourage more sustainable movement patterns for local trips, therefore helping to minimise greenhouse gas emissions. • The Development Option does not preclude the use of renewable energy generation to be provided in conjunction with the new homes at the detailed design stage. • As the majority of the Study Area sits on a south facing slope, the existing topography will dictate, to an extent, the creation of an east-west street pattern. Such a street pattern would maximise the number of buildings that can be orientated broadly to the south. This would maximise the opportunity for daylighting, passive solar and the use of solar panels. • It is envisaged that the Development Option could deliver a significant net gain of new woodland and tree planting. <p data-bbox="456 584 562 608">Summary:</p> <p data-bbox="456 612 2002 783">The Development Option will be served by existing bus services that presently run along Ninfield Road. Also, as mentioned above within this SA, the opportunity may exist for bus services to be routed along the North Bexhill Access Road, which would maximise accessibility to public transport and therefore help to further reduce the emission of Greenhouse gases. The proposed network of pedestrian and cycle routes would help to encourage more sustainable movement patterns for local trips. The Development Option also does not preclude the use of on-site energy generation, although the full scale of such measures would need to be balanced against viability considerations. If the above measures can be successfully implemented, then it is considered that they would help to balance the negative effects of such development on the production of Greenhouse gases.</p> <p data-bbox="456 818 1984 874">However, the above measures would help to minimise emissions of Greenhouse gases and reduce emissions. Therefore, the Development Option will conflict with the objectives of SA11 in that it may result in minor adverse effects.</p>

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SA Objective	Commentary
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SA12	<p>Minimise the risk of flooding and resulting detriment to people and property</p>	<ul style="list-style-type: none"> The Development Option does not place inappropriate development in areas of flood risk. It would provide sufficient open space to incorporate Sustainable Drainages Systems (SuDS) features to manage excess surface water run-off during periods of heavy or persistent rainfall in order to prevent flooding and avoid exacerbating flood risk off-site. 	0
		<p>Summary: The Development Option would successfully avoid areas at risk from flooding and provide sufficient open space to incorporate new SuDS measures. Therefore, the Development Option will not exacerbate flood risk. Further investigation of the potential SuDS measures may highlight that measures can be put in place to reduce existing Greenfield run-off rates, which would be a clear benefit to reducing an flooding issues that may existing downstream of the Study Area. If this can be achieved, then the Development Option could be considered to deliver positive effects to the wider area, which would increase the score.</p>	

SA Objective	Commentary
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SA13	<p>Maintain, improve and manage water resources in a sustainable way</p>	<ul style="list-style-type: none"> The Development Option would provide sufficient open space to incorporate SuDS features. The SuDS features would slow and hold back the excess surface water that runs off the site, allowing natural processes to break down pollutants. The Study Area is not located within a groundwater source protection zone and does not have an aquifer located underneath it ⁴. The Study Area lies outside of any hydrological catchment areas. The Development Option would provide sufficient open space to incorporate SuDS features to manage excess surface water run-off during periods of heavy or persistent rainfall in order to prevent flooding and avoid exacerbating flood risk off-site. At the detailed design stage, the SuDS feature would present the opportunity to be sensitively designed, and subsequently managed, to appear as natural features within the landscape setting and provide habitat for a range of wetland species. 	✓
		<p>Summary: The Development Option's strong network of green spaces would provide excellent scope for incorporating new SuDS features ,which would help to appropriately maintain and manage water resources in an adequate way, including breaking down pollutants. The new SuDS features would also present the opportunity to be sensitively designed to provide both landscape and ecological benefits. Beyond these on-site benefits, the Development Option would not deliver any wider benefits for the wider area and therefore it is considered to support this objective, albeit it would only have a minor positive effect.</p>	

⁴As per Environment Agency Mapping (<http://maps.environment-agency.gov.uk>)

SA Objective	Commentary
<p data-bbox="159 699 219 722">SA14</p> <p data-bbox="237 655 416 767">Conserve and enhance biodiversity and geodiversity</p>	<ul data-bbox="456 288 1995 890" style="list-style-type: none"> • The Development Option locates the development to avoid the Study Area’s principal landscape and ecology features, such as the areas of existing woodland, hedgerows and watercourses. These retained habitats are noted to likely support a range of notable and protected wildlife, including bats, badgers, dormice, birds, reptiles and amphibians. • The Development Option retains the existing areas of woodland and hedgerow within the Study Area to avoid habitat fragmentation. However, it is important to note that the route of the North Bexhill Access Road would effectively sever the Development Option from the wider countryside beyond. • The existing landscape features would be retained within areas of open space, consequently providing good opportunities for enhancement of existing landscape features to deliver a range of landscape and ecological enhancements. These areas of open space would also provide sufficient space for mitigation where existing limited lengths of hedgerow may need to be removed to allow for access between development parcels. • The Development Option would avoid harm to the on-site Ancient Woodland and retain the existing TPOs located in the south western part of the site adjacent to Ninfield Road. • It is acknowledged that the Study Area lies within a Biodiversity Opportunity Area (BOA). In line with the objectives of the BOA, the Development Option would retain and enhance existing key habitat features, maintain and improve linkages between key habitats and maximise the creation of new habitats to form meaningful habitat corridors across the landscape. Where habitat could be lost/impacted, the Development Option allows for sufficient space for appropriate mitigation and/or compensation measures to ensure there will be no net loss of biodiversity as a result of the new development. • It is acknowledged that the Study Area lies within a Biodiversity Opportunity Area (BOA). In line with the objectives of the BOA, the Development Option would retain and enhance existing key habitat features, maintain and improve linkages between key habitats and maximise the creation of new habitats to form meaningful habitat corridors across the landscape. Where habitat could be lost/impacted, the Development Option allows for sufficient space for appropriate mitigation and/or compensation measures to ensure there will be no net loss of biodiversity as a result of the new development. <p data-bbox="456 959 562 979">Summary:</p> <p data-bbox="456 986 1995 1155">The Development Option’s green infrastructure would be based upon the retention of existing landscape features, including hedgerows and areas of woodland. This approach to the spatial layout of the Development Option has created logical parcels for new development, which would therefore allow for the retention and enhancement of key habitat features and the retention and enhancement of linkages between these habitat features. The Development Option creates generous areas of space around these existing landscape features to allow for sufficient space for appropriate mitigation and/or compensation measures to ensure there would be no net loss of biodiversity as a result of the new development. Therefore, it is considered that the effect of Development Option 1 on SA14 is neutral insofar as there would be no net loss of biodiversity.</p>

SA Objective	Commentary
<p data-bbox="163 651 226 676">SA15</p> <p data-bbox="241 595 423 735">Protect and enhance the high quality natural and built environment</p>	<ul data-bbox="461 272 2000 743" style="list-style-type: none"> • The Development Option would avoid the removal of on-site Ancient Woodland, Ghyll Woodland and woodland. It would also minimise the loss existing hedgerows, although the spatial arrangement of uses provides generous areas of open space to mitigate the loss of existing hedgerow vegetation. • The Study Area is not subject to any statutory or non-statutory designations for landscape quality. The majority of the proposed built development would be located within the parts of the Study Area that have a moderate high capacity to accommodate new development. The balance of the proposed built development would lie within parts of the Study Area that have a moderate capacity to accommodate. • The majority of the proposed development would lie on a south facing slope, which together with existing and new landscaping to the north, would serve to contain the proposed development from the wider area. The Development Option would therefore be well related to the existing edge of Bexhill. • New landscaping along the boundaries of the Study Area and the supplemental planting of the existing hedgerows and woodland would help to assimilate the development into the surrounding landscaping. • The Development Option therefore could be developed without significant effects on views from the surrounding area or harm to the wider landscape character. • The Development Option would respect the setting of the listed buildings at Preston Hall by retaining the existing vegetation that runs along the Combe Haven. • The Development Option would also retain an area of open space between the proposed residential development area and the listed buildings, which would allow for early landscaping to increase screening. This buffer will help to minimise effects of the proposed development on the listed buildings. <p data-bbox="461 799 566 825">Summary:</p> <p data-bbox="461 831 2000 943">The Development Option puts forward a landscape-led solution which would be largely contained by the North Bexhill Access Road, existing topography and landscaping. Therefore, the Development Option would be contained within the wider landscape to the north and would be well-related to the existing settlement edge. Within the Study Area the Development Option would work around the existing hedgerows and woodland, retaining generous areas of open space to offer good scope to reinforce these existing landscape features and therefore help to mitigate landscape impact.</p> <p data-bbox="461 975 2000 1062">Notwithstanding the above, the Development Option would result in a change to the landscape character of the Study Area, albeit without significant effects on views from the surrounding area or harm to the wider landscape character. The Development Option would allow for sufficient space to apply mitigation measures in the form of new landscaping. Therefore, it is considered that the Development Option would have a minor adverse effect on the objectives of SA15.</p>

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SA Objective	Commentary	
SA16	<p>Reduce waste generation and disposal, and achieve the sustainable management of waste</p>	<ul style="list-style-type: none"> The Development Option would result in some increase in waste generation, but would be limited by the geographic focus of the new growth. Also, Rother District Council adopts sustainable management policies.
		<p>Summary: The inherent increase in waste generation means that the Development Option would not reduce waste generation, but the adoption of sustainable management policies would help to minimise waste generation. For this reason the Development Option cannot reduce waste generation and therefore conflicts with the SA and may result in minor adverse effects.</p>

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Appendix B - Option 2 SA Matrix

SA Objective	Commentary
<p>SA1</p> <p>Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home</p>	<ul style="list-style-type: none"> • This Development Option would deliver 480 new dwellings, of which 144 dwellings would be for affordable tenures as per the provisions of Policy LHN2 (Affordable Housing) of the Rother Local Plan Core Strategy. There is sufficient scope within the design framework of the Development Option to accommodate an appropriate housing mix and meet any identified needs for specialist housing, whilst providing opportunities for sustainable buildings. • There have been no major constraints identified at this stage which might result in viability issues and potentially compromise the delivery of affordable housing on the site. • The Development Option puts forward a form of development that would be well-related to the existing settlement edge and the planned development at North East Bexhill. It therefore offers a location where the new homes would be physically connected to existing and allocated residential areas, allocated business development areas and the facilities these areas provide. The western and southernmost parts of the Development Option would be served by existing bus services along Ninfield Road, which provide connections with the wider area including Bexhill Railway Station (approximately 20 minute bus journey time). The relationship of the development parcels with the North Bexhill Access Road means that the introduction of any new bus services along the new road would ensure that the remainder of the Development Option would be well-served by public transport. • The Development Option would balance housing delivery with environmental capacity by avoiding the Study Area's principal landscape and ecology features, such as the areas of existing woodland, hedgerows and watercourses. Therefore, the proposed form of development would retain the Study Area's key ecological features/habitats and the connections between them. <p>Summary: The Development Option would deliver new housing, including affordable tenures in line with Rother District Council's (RDC) affordable housing policies. The Development Option also ensures new housing would be related to the existing settlement edge, whilst appropriately balancing housing need with the Study Area's environmental capacity. Therefore, it is considered the Development Option will have a potentially significant beneficial effect on the objectives of SA1.</p>

SA Objective	Commentary
<p data-bbox="165 826 215 855">SA2</p> <p data-bbox="237 743 398 943">Improve the health and well-being of the population and reduce inequalities in health</p>	<ul data-bbox="456 284 2002 943" style="list-style-type: none"> • The nearest health care facility is Sidley Surgery which is located approximately 500 metres to the south of the southernmost part of the Study Area. The furthest proposed residential development parcel would be located approximately 1,300 metres away from Sidley Surgery. The existing bus services along Ninfield Road presently serve bus stops located to Sidley Surgery. • It is considered that there is sufficient scope within the Development Option to accommodate a new health care facility, if future investigations/studies identify that one is required. • The Development Option has been structured to create a series of open space corridors connecting to larger areas of open space within the Study Area and eastwards to the Combe Valley Countryside Park. The areas of open space within the Development Option would offer excellent opportunities to increase the provision of, and access to, leisure in the form of new natural green space, public open space and recreational facilities. Key to this principle is the incorporation of the existing public footpaths and the provision of new recreational routes supplementing these existing rights of way. As a result, new connections would be created with off-site public footpaths and important new linkages established between the Development Option and the Combe Valley Countryside Park to the east. The Development Option ensures that the new residential development blocks would be closely related with the existing public footpaths and new recreational routes. • The proposed network of open spaces within the Development Option would transform existing private land into generous new areas of public open space, therefore significantly increasing the level of public open space in the local area. The relationship of the Development Option with the existing settlement edge and the presence of new and existing recreational routes would mean these areas of new public open space would be highly accessible, therefore benefiting new and existing residents alike. These new areas of public open space would help to promote physical activity and support healthy lifestyles by providing new routes for walking, jogging and cycling, areas for informal sports games and new children’s play facilities. • It is considered that the Development Option would avoid adverse noise pollution and that noise generated from the North Bexhill Access Road can be appropriately mitigated at the detailed design stage. • The Development Option avoids proximity to landfill, contamination, industrial and other polluting neighbours. <p data-bbox="456 994 562 1018">Summary:</p> <p data-bbox="456 1026 1995 1166">The Development Option is relatively remote from existing health care facilities in the town, although the existing bus services along Ninfield Road presently serve bus stops within close proximity of Sidley Surgery. However, it is considered there is sufficient scope within the Development Option to accommodate a new health care facility if one is required as a result of the new development at North Bexhill. Therefore, it is recommended that investigations should be carried out to ascertain the impacts of the new development on existing health care provision in the town and whether existing facilities should be extended or a new health care facility is provided on-site.</p> <p data-bbox="456 1201 1995 1254">The Development Option would significantly increase the level of public open space in this part Bexhill to the benefit of the health and well-being of existing and new residents alike.</p> <p data-bbox="456 1289 1995 1406">As the Development Option would provide a significant increase in public open space and has the potential, if required, to provide a new health care facility, it is considered that the Development Option would have a potentially significant beneficial effect on the objectives of SA2. However, it is important to acknowledge that the land ownership of the existing properties and field directly to the east of Watermill Lane should be investigated to ascertain whether a new recreational route and new public open space along the northern side of the Combe Haven can be implemented to create the green corridor link to the Combe Valley Countryside Park.</p>



SA Objective	Commentary		
SA3	Reduce crime and fear of crime	<ul style="list-style-type: none"> Facilitating housing of all sectors of society, including disadvantaged groups, may help to reduce crime. The nearest police station (Bexhill Police Station) is located approximately 2.3km from the Development Option. It is considered therefore that the Development Option is within a reasonable proximity of the police station. The opportunity may exist to provide a community hall on-site (see also SA4). If so, the opportunity may also exist to incorporate a Sussex Police drop in/touch down facility within the centre. 	
		<p>Summary: The distance between the Development Option and the nearest police station is not considered to be an issue. It is recommended that dialogue with Sussex Police should be undertaken to ascertain whether the provision of a Sussex Police drop in/touch down facility (as part of a new community hall) could be a viable benefit of the new development. For these reasons, it is considered that the Development Option supports this objective, although it is likely to be only a positive minor effect.</p>	

SA Objective	Commentary
<p>SA4</p> <p>Reduce deprivation and social exclusion</p>	<ul style="list-style-type: none"> • Generally, easier access to the housing market may help to reduce social deprivation and social exclusion. • The Development Option would deliver up to 144 affordable dwellings. It is envisaged that these new affordable homes would be of a type and size that would meet local need, with a tenure mix split between social rented and intermediate housing. It is also considered that the Development Option would provide specialist accommodation for older people, if required. • It is considered that the Development Option can be appropriately brought forward to achieve a size, type and mix of dwellings that will reflect both current and projected housing needs, including contributing to the increased provision of family dwellings as per Core Strategy Policy LHN1 (Achieving Mixed and Balanced Communities). • The provision of extensive areas of new public open space (including play facilities), together the potential to accommodate new community facilities, playing fields, such as a community hall, would help to reduce social exclusion by providing much needed community facilities. • The provision of potential new business development would help to secure economic growth to match housing growth, which would have a positive benefit on reducing deprivation and social exclusion. Furthermore, the provision of potential new business development within walking and cycling distance of the new homes has clear benefits in providing employment opportunities for people who cannot afford to run a car. The close proximity of the proposed new homes with the business development at North East Bexhill would deliver similar benefits. • The nearest primary schools are Glenleigh Park Primary Academy and All Saints C of E Primary School, which are located approximately 600m and 750m (as the crow flies) respectively from the southernmost part of the Development Option. The actual walking distance to both primary schools from the farthest part of the Development Option would be below the statutory walking distance of 2 miles for children under 81. The nearest secondary school is Bexhill High School, which is located 800m (as the crow flies) from the southernmost part of the Development Option. The actual walking distance to Bexhill High School from the farthest part of the Development Option would be below the statutory walking distance of 3 miles for children aged 8 and over¹. If required, it is considered that the Development Option could accommodate a new primary school, although this would likely have an impact on the total number of dwellings it could accommodate. • The Development Option puts forward a form of development that would be well-related to the existing settlement edge and the planned development at North East Bexhill. It promotes integration with the existing and emerging settlement edge by utilising both existing public footpaths and new recreational routes. The North Bexhill Access Road would also provide an important point of integration with North East Bexhill. <p>Summary:</p> <p>The Development Option may help to reduce deprivation and social exclusion through easier access to the housing market and the provision of accessible new employment opportunities at the potential safeguarded business development area. The Development Option would deliver extensive new areas of public open space and presents the opportunity to deliver other community facilities, such as a community hall. It is considered that there is also scope to deliver a new primary school, if required, although this could have an impact on the overall quantum of residential development. It is recommended that further investigation is carried out to ascertain the impacts on current educational provision and whether the new development would generate the need for a primary school to be provided on-site. Similarly, it is recommended further investigation is undertaken to establish whether the development can address any existing shortfalls in community facility provision.</p> <p>For the above reasons, it is considered that the Development Option would support the objective of reducing deprivation and social exclusion, although it is likely to be limited to a positive minor effect.</p>

¹ Section 444(5) of the Education and Inspections Act 2006

SA Objective	Commentary
SA5 Raise educational achievement levels and develop the opportunities for lifelong learning	<ul style="list-style-type: none"> SA5 is not relevant to this Sustainability Assessment and therefore cannot be appropriately assessed. Accessibility to schools is assessed in SA4.

SA Objective	Commentary
SA6 Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	<ul style="list-style-type: none"> The construction of the Development Option's new homes and the potential safeguarded business development area would provide a number of economic benefits locally, including jobs linked directly to the construction of new development, jobs supported through the supply chain, additional retail expenditure generated by the new residents, additional Council Tax income and New Homes Bonus payments. The potential safeguarded business development area would deliver up to 6,500sq.m of business development floorspace, which would support of the order of 189 jobs². After completion of the construction phase, the new potential safeguarded business development area would provide the opportunity to accommodate a diverse range of jobs and contributes to economic regeneration and growth of the town. The provision of the potential safeguarded business development area in close proximity of the proposed new homes would provide convenient access to new jobs, therefore promoting more sustainable travel-to-work patterns and creating a vibrant new development that benefits from possessing a mix of both business and residential development. The potential safeguarded business development area location in the eastern part of the Study Area would ensure it benefits from good access to the planned employment opportunities at North East Bexhill. It is considered that this Development Option avoids negative impacts upon economic, tourist or heritage assets. <p>Summary: The new housing would provide a number of economic benefits locally, including jobs related to construction and through the provision of new potential business development land. As the construction phase would be relatively short term and the scale of the residential and potential business development relatively limited in comparison to the scale of the wider area, the Development Option is likely to have a positive minor effect on the economic objectives of SA6. In comparison to Development Option 1, the potential safeguarded business development area would have better access to the planned employment opportunities at North East Bexhill, although the closer proximity is not considered sufficiently beneficial to result in a difference in the effects on the economic objectives of SA6 due to the accessibility that will be afforded by the North Bexhill Access Road.</p>

²An average of 40sq.m per worker is assumed as per the Hastings and Rother Employment Strategy and Land Review Update (August 2011)

SA Objective	Commentary
<p style="text-align: center;">SA7</p> <p style="text-align: center;">Improve accessibility to services and facilities for all ages across the District</p>	<ul style="list-style-type: none"> • The Development Option puts forward a form of development that would be well-related to the existing settlement edge and the planned development at North East Bexhill. It therefore offers a location where the new homes would be physically connected to existing and allocated residential areas, the allocated business development areas and the existing facilities these areas provide. These facilities include the existing sports ground at St. Mary's Lane, the district shopping/service centre at Sidley and the local schools. • It is considered that the Development Option would have scope to provide some local services on-site, such as a local shop, a doctor's surgery, nursery or community hall. The Development Option could also accommodate a new primary school, although this would likely have an impact on the total number of dwellings it could accommodate. Equally, the Development Option would be required to make contributions to help support and improve local infrastructure, including schools and highways. • The western and southernmost parts of the Development Option would be served by existing bus services along Ninfield Road, whilst the relationship of the development parcels with the North Bexhill Access Road means that the introduction of any new bus services along its route would ensure that the remainder of the Development Option would be well served by public transport. • The Development Option provides the opportunity to enhance the existing public footpath network within the Study Area. They could be appropriately surfaced to ensure year-round use and widened to accommodate cyclists. The Development Option also establishes how a network of new recreational routes could be extended to the existing public footpaths within the Study Area to create traffic-free connections to the Combe Valley Countryside Park and the existing public rights of way that abut the Study Area. • The implementation of the Development Option would secure appropriate provision or developer contributions for the timely delivery of infrastructure needs associated with the new development in accordance with Policy IM2 (Implementation and Infrastructure) of the Rother Local Plan Core Strategy and the latest Infrastructure Delivery Plan. • The timely delivery of the North Bexhill Access Road creates the basis for an accessible new development. The Development Option locates potential new business development adjacent to North Bexhill Access Road due to the good accessibility afforded by the road. The Development Option does not preclude the delivery of other local service and facilities within the most accessible parts of the development. • The delivery of up to 480 new dwellings and in the order of 189 new jobs would help to support the continued viability of services in the local area through direct and indirect jobs linked to the construction of the Development Option, additional retail expenditure locally and additional Council Tax and business taxes. <p>Summary: The Development Option puts forward a form of development that would be well-related to the existing settlement edge and the planned development at North East Bexhill. The Development Option also utilises the existing public footpaths and a network of new recreational routes to maximise accessibility to the existing and planned settlement edge and therefore the facilities provided within them. The Development Option would deliver the timely delivery of infrastructure needs associated with the development, not least the provision of new areas of public open space that would accommodate a range of new outdoor uses/facilities. However, at this stage the full scope community facility provision to be provided is not fully known. Therefore, it is concluded that the Development Option supports the objectives of SA7, although the benefits would be relatively limited in scope/scale and only have a minor effect.</p>



SA Objective	Commentary		
SA8	<p>Encourage and facilitate increased engagement in cultural and leisure activities</p>	<ul style="list-style-type: none"> • The new housing development is likely to increase the catchment (and demand) for cultural and leisure activities, and hence stimulate and facilitate activity. • The Development Option would secure the provision of approximately 30 hectares of green infrastructure that could be brought into the public realm. This green infrastructure has the potential to secure a range of leisure activities including providing new routes for walking, jogging and cycling, areas for informal sports games and new children’s play facilities. The connected network of open spaces established by the Development Option means that all the new homes would be within easy reach of these new facilities. • The Development Option would be well-connected to existing and new pedestrian/cycle routes which would provide links across the Study Area giving access to the Combe Valley Countryside Park and other areas of countryside. • The principles of vehicular access and pedestrian/cycle connectivity illustrated by the Development Option would create the basis for a well connected and permeable development that would afford good access to new community facilities. • Subject to viability, the Development Option would secure new green infrastructure and community facilities through appropriate provision or developer contributions in accordance with Policy IM2 (Implementation and Infrastructure) of the Rother Local Plan Core Strategy and the latest Infrastructure Delivery Plan. • The potential safeguarded business development area accommodated within the Development Option could accommodate new cultural enterprises/organisations. 	
		<p>Summary: The new development could increase the catchment for cultural and leisure activities in the town. The delivery of new public open space would assist in delivering new leisure activities, such as walking, cycle, sports pitches and children’s play area. As these benefits are generally limited in scope and scale, it is considered the Development Option would only have a minor effect on the objectives of SA8.</p>	

SA Objective	Commentary
<p>SA9</p> <p>Improve efficiency in land use and encourage the prudent use of natural resources</p>	<ul style="list-style-type: none"> • The Development Option would result in the loss of agricultural land within Grade 3 (Good to Moderate) and Grade 4 (Poor)³. The development of any land around the built up area of Bexhill is likely to include land of a similar grade. • The Development Option shows how significant new areas of public open space could be provided to form an important new community asset that would contain new recreational routes, sports pitches and children’s play areas. Critically, the Development Option would deliver new linkages to the Combe Valley Countryside Park. The Development Option also does not preclude the delivery of other community facilities such as a community hall, a doctor’s surgery or crèche. • The Development Option applies a density standard of 28 dph. This lower density form of development is dictated by the topography of the Study Area. • As the majority of the Study Area sits on a south facing slope, the existing topography would dictate, to an extent, the creation of an east-west street pattern. Such a street pattern would maximise the number of buildings that could be orientated broadly to the south. This would maximise the opportunity for daylighting, passive solar and the use of solar panels. • The construction of the North Bexhill Access Road will create a new ‘utilities corridor’ underneath which services such as water, electricity and sewerage will run in order to serve the Development Option. <p>Summary: The Development Option comprises the development of Greenfield land, which does not meet the objective of SA9 to use land that has previously been developed. Consequently, the Development Option would result in the loss of agricultural land within Grade 3 and Grade 4, although the development of any land around Bexhill is likely to include land of a similar scale. It is envisaged that the on-site topography would allow for a development form that maximise the number of dwellings that could be orientated to the south to maximise natural daylighting, passive solar gain and the use of solar panels. However, the ability to adopt sustainable/renewable energy practices does not fully outweigh the loss of Greenfield land and therefore the Development Option partially conflicts with SA9, resulting in minor adverse effects.</p>

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³As per 1:250 000 Series Agricultural Land Classification mapping prepared by Natural England. This map represents a generalised pattern of land classification grades and any enlargement of the scale of the map would be misleading. This map does not show subdivisions of Grade 3 which are normally mapped by more detailed survey work.

SA Objective	Commentary
<p data-bbox="163 699 226 722">SA10</p> <p data-bbox="241 568 427 858">Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage</p>	<ul data-bbox="461 280 2002 751" style="list-style-type: none"> • The close relationship of the Development Option with the North Bexhill Access Road means that the new housing and potential business development would benefit from a direct connection to the Bexhill-Hastings Link Road, therefore minimising impacts on existing traffic levels within the area. The North Bexhill Access Road will provide direct and convenient connections to the business development that is planned at North East Bexhill. • The Development Option is well related to existing public footpaths, which could be upgraded to accommodate cyclists. The Development Option also accommodates a network of new recreational routes which would connect with these existing rights of ways. These new and existing routes would provide direct connections to the existing settlement edge, the adjacent countryside and the Combe Valley Countryside Park, which would encourage more sustainable movement patterns for local trips. • The western and southernmost parts of the Development Option would be served by existing bus services along Ninfield Road, whilst the relationship of the development parcels with the North Bexhill Access Road means that the introduction of any new bus services along its route would ensure that the remainder of the Development Option would be well-served by public transport. • The provision of the safeguarded business development area in close proximity of the proposed new homes would provide convenient access to new jobs, therefore promoting more sustainable travel-to-work patterns. • The implementation of the Development Option is expected to secure appropriate provision or developer contributions for the delivery of measures to mitigate traffic impacts generated by the new development. <p data-bbox="461 799 566 823">Summary:</p> <p data-bbox="461 826 2002 938">The Development Option would result in an increase to traffic and associated pollution levels. However, the planned nature of a development of this size would allow required highway mitigation measures to be delivered in a planned and appropriate manner. The Development Option would also be well-related to the existing public footpaths and provide a number of new recreational routes that maximise the connections with the existing settlement edge, which would help to encourage more sustainable movement patterns for local trips.</p> <p data-bbox="461 975 2002 1054">It is recommended that further investigation is carried out to ascertain the viability of either diverting existing bus routes or providing new bus routes routed along the North Bexhill Access Road to increase the level of public transport provision supporting the Development Option. The provision of bus services along the North Bexhill Access Road would help to minimise car usage associated with the new development.</p> <p data-bbox="461 1091 2002 1147">However, as the Development Option would increase traffic levels, albeit with the North Bexhill Access Road in place, it will not reduce road congestion and pollution levels in the wider area and therefore is considered to conflict with SA10, albeit it is likely to only result in minor adverse effects.</p>

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SA Objective	Commentary	
SA11	Reduce emissions of Greenhouse gases	<ul style="list-style-type: none"> • The Development Option would be served by existing bus services and benefits from a number of existing and new pedestrian/cycle connections, which would help to encourage more sustainable movement patterns for local trips, therefore helping to minimise greenhouse gas emissions. • The Development Option does not preclude the use of renewable energy generation to be provided in conjunction with the new homes and business development at the detailed design stage. • As the majority of the Study Area sits on a south facing slope, the existing topography will dictate, to an extent, the creation of an east-west street pattern. Such a street pattern would maximise the number of buildings that can be orientated broadly to the south. This would maximise the opportunity for daylighting, passive solar and the use of solar panels. • It is envisaged that the Development Option could deliver a significant net gain of new woodland and tree planting.
		<p>Summary: The Development Option will be served by existing bus services that presently run along Ninfield Road. Also, as mentioned above within this SA, the opportunity may exist for bus services to be routed along the North Bexhill Access Road, which would maximise accessibility to public transport and therefore help to further reduce the emission of Greenhouse gases. The proposed network of pedestrian and cycle routes would help to encourage more sustainable movement patterns for local trips. The Development Option also does not preclude the use of on-site energy generation, although the full scale of such measures would need to be balanced against viability considerations. If the above measures can be successfully implemented, then it is considered that they would help to balance the negative effects of such development on the production of Greenhouse gases.</p> <p>However, the above measures would help to minimise emissions of Greenhouse gases and reduce emissions. Therefore, the Development Option will conflict with the objectives of SA11 in that it may result in minor adverse effects.</p>

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SA Objective	Commentary		
SA12	<p>Minimise the risk of flooding and resulting detriment to people and property</p>	<ul style="list-style-type: none"> The Development Option does not place inappropriate development in areas of flood risk. It would provide sufficient open space to incorporate Sustainable Drainages Systems (SuDS) features to manage excess surface water run-off during periods of heavy or persistent rainfall in order to prevent flooding and avoid exacerbating flood risk off-site. 	0
		<p>Summary: The Development Option would successfully avoid areas at risk from flooding and provide sufficient open space to incorporate new SuDS measures. Therefore, the Development Option will not exacerbate flood risk. Further investigation of the potential SuDS measures may highlight that measures can be put in place to reduce existing Greenfield run-off rates, which would be a clear benefit to reducing an flooding issues that may existing downstream of the Study Area. If this can be achieved, then the Development Option could be considered to deliver positive effects to the wider area, which would increase the score.</p>	

SA Objective	Commentary		
SA13	<p>Maintain, improve and manage water resources in a sustainable way</p>	<ul style="list-style-type: none"> The Development Option would provide sufficient open space to incorporate SuDS features. The SuDS features would slow and hold back the excess surface water that runs off the site, allowing natural processes to break down pollutants. The Study Area is not located within a groundwater source protection zone and does not have an aquifer located underneath it ⁴. The Study Area lies outside of any hydrological catchment areas. The Development Option would provide sufficient open space to incorporate SuDS features to manage excess surface water run-off during periods of heavy or persistent rainfall in order to prevent flooding and avoid exacerbating flood risk off-site. At the detailed design stage, the SuDS feature would present the opportunity to be sensitively designed, and subsequently managed, to appear as natural features within the landscape setting and provide habitat for a range of wetland species. 	✓
		<p>Summary: The Development Option's strong network of green spaces would provide excellent scope for incorporating new SuDS features, which would help to appropriately maintain and manage water resources in an adequate way, including breaking down pollutants. The new SuDS features would also present the opportunity to be sensitively designed to provide both landscape and ecological benefits. Beyond these on-site benefits, the Development Option would not deliver any wider benefits for the wider area and therefore it is considered to support this objective, albeit it would only have a minor positive effect.</p>	

⁴As per Environment Agency Mapping (<http://maps.environment-agency.gov.uk>)

SA Objective	Commentary
<p data-bbox="159 619 219 643">SA14</p> <p data-bbox="237 576 416 691">Conserve and enhance biodiversity and geodiversity</p>	<ul data-bbox="456 272 1995 738" style="list-style-type: none"> • The Development Option would result in residential development being located immediately to the west of Watermill Lane. This part of the Study Area is identified as having a grassland habitat that is potentially more diverse in comparison to other parts of the Study Area and therefore it is recommended to be retained where possible. Development Option 2 would have insufficient scope to appropriately mitigate the loss of the grassland habitat. This also means that the Development Option is unlikely to meet the BOA objective of ensuring no net loss of biodiversity as a result of the development. • Away from the grassland to the west of Watermill Lane, the Development Option locates the development to avoid the Study Area’s principal landscape and ecology features, such as the areas of existing woodland, hedgerows and watercourses. These retained habitats are noted to likely support a range of notable and protected wildlife, including bats, badgers, dormice, birds, reptiles and amphibians. • The Development Option retains the existing areas of woodland and hedgerow within the Study Area to avoid habitat fragmentation. However, it is important to note that the route of the North Bexhill Access Road would effectively sever the Development Option from the wider countryside beyond. • The existing landscape features would be retained within areas of open space, consequently providing good opportunities for enhancement of existing landscape features to deliver a range of landscape and ecological enhancements. These areas of open space would also provide sufficient space for mitigation where existing limited lengths of hedgerow may need to be removed to allow for access between development parcels. • The Development Option would avoid harm to the on-site Ancient Woodland and retain the existing TPOs located in the south western part of the site adjacent to Ninfield Road. <p data-bbox="456 799 562 818">Summary:</p> <p data-bbox="456 826 1995 999">The Development Option’s green infrastructure would be based upon the retention of existing landscape features, including hedgerows and areas of woodland. This approach to the spatial layout of the Development Option has created logical parcels for new development that avoid the majority of the Study Area’s biodiversity interest. However, the Development Option proposes to locate residential development directly to the west of Watermill Lane, which comprises a part of the Study Area identified as having a grassland habitat that is potentially more diverse in comparison to other parts of the Study Area. As the Study Area has insufficient scope to appropriately mitigate the loss of the grassland habitat the Development Option would not meet the BOA objectives of ensuring that there would be no net loss of biodiversity as a result of the development. Therefore, it is considered that Development Option 2 would have a minor adverse effect on the objectives of SA14.</p>

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SA Objective	Commentary
<p data-bbox="163 699 226 722">SA15</p> <p data-bbox="241 639 427 783">Protect and enhance the high quality natural and built environment</p>	<ul data-bbox="461 268 2007 847" style="list-style-type: none"> • The Development Option would avoid the removal of on-site Ancient Woodland, Ghyll Woodland and woodland. It would also minimise the loss existing hedgerows, although the spatial arrangement of uses provides generous areas of open space to mitigate the loss of existing hedgerow vegetation. • The Study Area is not subject to any statutory or non-statutory designations for landscape quality. The majority of the proposed built development would be located within the parts of the Study Area that have a moderate high capacity to accommodate new development. The balance of the proposed built development would lie within parts of the Study Area that have a moderate capacity to accommodate, apart from a small section of the proposed business development land within an area that has moderate low capacity for change. • The majority of the proposed development is located to the south of the NBAR, which provides a strong degree of containment. The business development land would be the only part of the proposed development located to the northern side of the NBAR. • The majority of the proposed development would lie on a south facing slope, which together with existing and new landscaping to the north, would serve to contain the proposed development from the wider area. The Development Option would therefore be well related to the existing edge of Bexhill. • New landscaping along the boundaries of the Study Area and the supplemental planting of the existing hedgerows and woodland would help to assimilate the development into the surrounding landscaping. • The Development Option therefore could be developed without significant effects on views from the surrounding area or harm to the wider landscape character. • The Development Option would respect the setting of the listed buildings at Preston Hall by retaining the existing vegetation that runs along the Combe Haven. • The Development Option would also retain an area of open space between the proposed residential development area and the listed buildings, which would allow for early landscaping to increase screening. This buffer will help to minimise effects of the proposed development on the listed buildings. <p data-bbox="461 879 566 903">Summary:</p> <p data-bbox="461 911 2007 1023">The Development Option puts forward a landscape-led solution which would be largely contained by the North Bexhill Access Road, existing topography and landscaping. Therefore, the Development Option would be contained within the wider landscape to the north and would be well-related to the existing settlement edge. Within the Study Area the Development Option would work around the existing hedgerows and woodland, retaining generous areas of open space to offer good scope to reinforce these existing landscape features and therefore help to mitigate landscape impact.</p> <p data-bbox="461 1054 2007 1142">Notwithstanding the above, the Development Option would result in a change to the landscape character of the Study Area, albeit without significant effects on views from the surrounding area or harm to the wider landscape character. The Development Option would allow for sufficient space to apply mitigation measures in the form of new landscaping. Therefore, it is considered that the Development Option would have a minor adverse effect on the objectives of SA15.</p>

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SA Objective	Commentary	
SA16	<p>Reduce waste generation and disposal, and achieve the sustainable management of waste</p>	<ul style="list-style-type: none"> The Development Option would result in some increase in waste generation, but would be limited by the geographic focus of the new growth. Also, Rother District Council adopts sustainable management policies.
		<p>Summary: The inherent increase in waste generation means that the Development Option would not reduce waste generation, but the adoption of sustainable management policies would help to minimise waste generation. For this reason the Development Option cannot reduce waste generation and therefore conflicts with the SA and may result in minor adverse effects.</p>

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Appendix C - Option 3 SA Matrix

SA Objective	Commentary
<p>SA1</p> <p>Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home</p>	<ul style="list-style-type: none"> • This Development Option would deliver 630 new dwellings, of which 189 dwellings would be for affordable tenures as per the provisions of Policy LHN2 (Affordable Housing) of the Rother Local Plan Core Strategy. There is sufficient scope within the design framework of the Development Option to accommodate an appropriate housing mix and meet any identified needs for specialist housing, whilst providing opportunities for sustainable buildings. • There have been no major constraints identified at this stage which might result in viability issues and potentially compromise the delivery of affordable housing on the site. • The Development Option puts forward a form of development that in the main would be well-related to the existing settlement edge and the planned development at North East Bexhill. It therefore offers a location where the new homes would be physically connected to existing and allocated residential areas, allocated business development areas and the facilities these areas provide. However, the proposed residential development parcels located to the west of St. Mary's Lane would be remote from both the existing settlement edge of Bexhill and remainder of the residential development put forward by the Development Option 3. • The western and southernmost parts of the Development Option would be served by existing bus services along Ninfield Road, which provide connections with the wider area including Bexhill Railway Station (approximately 20 minute bus journey time). The relationship of the development parcels with the North Bexhill Access Road means that the introduction of any new bus services along the new road would ensure that the remainder of the Development Option would be well-served by public transport. • The Development Option would balance housing delivery with environmental capacity by avoiding the Study Area's principal landscape and ecology features, such as the areas of existing woodland, hedgerows and watercourses. Therefore, the proposed form of development would retain the Study Area's key ecological features/habitats and the connections between them. <p>Summary: The Development Option would deliver new housing, including affordable tenures in line with Rother District Council's (RDC) affordable housing policies. Most of the Development Option would be related to the existing settlement edge, although the proposed residential areas to the west of St. Mary's Lane would be remote from the other parts of the Development Option to the detriment of the overall scheme. Therefore, due to the poor relationship of the areas to the west of St. Mary's Lane with the existing settlement edge and the rest of the Development Option, it is considered that the benefits of the Development Option would be limited to a positive minor effect.</p>



SA Objective	Commentary
<p>SA2</p> <p>Improve the health and well-being of the population and reduce inequalities in health</p>	<ul style="list-style-type: none"> • The nearest health care facility is Sidley Surgery which is located approximately 500 metres to the south of the southernmost part of the Study Area. The furthest proposed residential development parcel would be located approximately 1,300 metres away from Sidley Surgery. The existing bus services along Ninfield Road presently serve bus stops located to Sidley Surgery. • It is considered that there is sufficient scope within the Development Option to accommodate a new health care facility, if future investigations/studies identify that one is required. • The Development Option has been structured to create a series of open space corridors connecting to larger areas of open space within the Study Area and eastwards to the Combe Valley Countryside Park. The areas of open space within the Development Option would offer excellent opportunities to increase the provision of, and access to, leisure in the form of new natural green space, public open space and recreational facilities. Key to this principle is the incorporation of the existing public footpaths and the provision of new recreational routes supplementing these existing rights of way. As a result, new connections would be created with off-site public footpaths and important new linkages established between the Development Option and the Combe Valley Countryside Park to the east. The Development Option ensures that the new residential development blocks would be closely related with the existing public footpaths and new recreational routes. • The proposed network of open spaces within the Development Option would transform existing private land into generous new areas of public open space, therefore significantly increasing the level of public open space in the local area. The relationship of the Development Option with the existing settlement edge and the presence of new and existing recreational routes would mean these areas of new public open space would be highly accessible, therefore benefiting new and existing residents alike. These new areas of public open space would help to promote physical activity and support healthy lifestyles by providing new routes for walking, jogging and cycling, areas for informal sports games and new children's play facilities. • It is considered that the Development Option would avoid adverse noise pollution and that noise generated from the North Bexhill Access Road can be appropriately mitigated at the detailed design stage. • The Development Option avoids proximity to landfill, contamination, industrial and other polluting neighbours. <p>Summary: The Development Option is relatively remote from existing health care facilities in the town, although the existing bus services along Ninfield Road presently serve bus stops within close proximity of Sidley Surgery. However, it is considered there is sufficient scope within the Development Option to accommodate a new health care facility if one is required as a result of the new development at North Bexhill. Therefore, it is recommended that investigations should be carried out to ascertain the impacts of the new development on existing health care provision in the town and whether existing facilities should be extended or a new health care facility is provided on-site.</p> <p>The Development Option would significantly increase the level of public open space in this part of Bexhill to the benefit of the health and well-being of existing and new residents alike.</p> <p>As the Development Option would provide a significant increase in public open space and has the potential, if required, to provide a new health care facility, it is considered that the Development Option would have a potentially significant beneficial effect on the objectives of SA2. However, it is important to acknowledge that the land ownership of the existing properties and field directly to the east of Watermill Lane should be investigated to ascertain whether a new recreational route and new public open space along the northern side of the Combe Haven can be implemented to create the green corridor link to the Combe Valley Countryside Park.</p>



SA Objective	Commentary		
SA3	Reduce crime and fear of crime	<ul style="list-style-type: none"> Facilitating housing of all sectors of society, including disadvantaged groups, may help to reduce crime. The nearest police station (Bexhill Police Station) is located approximately 2.3km from the Development Option. It is considered therefore that the Development Option is within a reasonable proximity of the police station. The opportunity may exist to provide a community hall on-site (see also SA4). If so, the opportunity may also exist to incorporate a Sussex Police drop in/touch down facility within the centre. 	
		<p>Summary: The distance between the Development Option and the nearest police station is not considered to be an issue. It is recommended that dialogue with Sussex Police should be undertaken to ascertain whether the provision of a Sussex Police drop in/touch down facility (as part of a new community hall) could be a viable benefit of the new development. For these reasons, it is considered that the Development Option supports this objective, although it is likely to be only a positive minor effect.</p>	

SA Objective	Commentary
<p>SA4</p> <p>Reduce deprivation and social exclusion</p>	<ul style="list-style-type: none"> • Generally, easier access to the housing market may help to reduce social deprivation and social exclusion. • The Development Option would deliver up to 190 affordable dwellings. It is envisaged that these new affordable homes would be of a type and size that would meet local need, with a tenure mix split between social rented and intermediate housing. It is also considered that the Development Option would provide specialist accommodation for older people, if required. • It is considered that the Development Option can be appropriately brought forward to achieve a size, type and mix of dwellings that will reflect both current and projected housing needs, including contributing to the increased provision of family dwellings as per Core Strategy Policy LHN1 (Achieving Mixed and Balanced Communities). • The provision of extensive areas of new public open space (including play facilities), together the potential to accommodate new community facilities, playing fields, such as a community hall, would help to reduce social exclusion by providing much needed community facilities. • The provision of potential new business development would help to secure economic growth to match housing growth, which would have a positive benefit on reducing deprivation and social exclusion. Furthermore, the provision of potential new business development within walking and cycling distance of the new homes has clear benefits in providing employment opportunities for people who cannot afford to run a car. The close proximity of the proposed new homes with the business development at North East Bexhill would deliver similar benefits. • The nearest primary schools are Glenleigh Park Primary Academy and All Saints C of E Primary School, which are located approximately 600m and 750m (as the crow flies) respectively from the southernmost part of the Development Option. The actual walking distance to both primary schools from the farthest part of the Development Option would be below the statutory walking distance of 2 miles for children under 8¹. The nearest secondary school is Bexhill High School, which is located 800m (as the crow flies) from the southernmost part of the Development Option. The actual walking distance to Bexhill High School from the farthest part of the Development Option would be below the statutory walking distance of 3 miles for children aged 8 and over¹. If required, it is considered that the Development Option could accommodate a new primary school, although this would likely have an impact on the total number of dwellings it could accommodate. • The Development Option puts forward a form of development that would be well-related to the existing settlement edge and the planned development at North East Bexhill. It promotes integration with the existing and emerging settlement edge by utilising both existing public footpaths and new recreational routes. The North Bexhill Access Road would also provide an important point of integration with North East Bexhill. <p>Summary: The Development Option may help to reduce deprivation and social exclusion through easier access to the housing market and the provision of accessible new employment opportunities at the potential safeguarded business development area. The Development Option would deliver extensive new areas of public open space and presents the opportunity to deliver other community facilities, such as a community hall. It is considered that there is also scope to deliver a new primary school, if required, although this could have an impact on the overall quantum of residential development. It is recommended that further investigation is carried out to ascertain the impacts on current educational provision and whether the new development would generate the need for a primary school to be provided on-site. Similarly, it is recommended further investigation is undertaken to establish whether the development can address any existing shortfalls in community facility provision.</p> <p>For the above reasons, it is considered that the Development Option would support the objective of reducing deprivation and social exclusion, although it is likely to be limited to a positive minor effect.</p>

¹ Section 444(5) of the Education and Inspections Act 2006

SA Objective	Commentary
SA5 Raise educational achievement levels and develop the opportunities for lifelong learning	<ul style="list-style-type: none"> SA5 is not relevant to this Sustainability Assessment and therefore cannot be appropriately assessed. Accessibility to schools is assessed in SA4.

SA Objective	Commentary
SA6 Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	<ul style="list-style-type: none"> The construction of the Development Option's new homes and the potential safeguarded business development area would provide a number of economic benefits locally, including jobs linked directly to the construction of new development, jobs supported through the supply chain, additional retail expenditure generated by the new residents, additional Council Tax income and New Homes Bonus payments. The potential safeguarded business development area would deliver up to 6,500sq.m of business development floorspace, which would support of the order of 189 jobs². After completion of the construction phase, the new potential safeguarded business development area would provide the opportunity to accommodate a diverse range of jobs and contributes to economic regeneration and growth of the town. The provision of the potential safeguarded business development area in close proximity of the proposed new homes would provide convenient access to new jobs, therefore promoting more sustainable travel-to-work patterns and creating a vibrant new development that benefits from possessing a mix of both business and residential development. The potential safeguarded business development area location in the eastern part of the Study Area would ensure it benefits from good access to the planned employment opportunities at North East Bexhill. It is considered that this Development Option avoids negative impacts upon economic, tourist or heritage assets. <p>Summary: The new housing would provide a number of economic benefits locally, including jobs related to construction and through the provision of new potential business development land. As the construction phase would be relatively short term and the scale of the residential and potential business development relatively limited in comparison to the scale of the wider area, the Development Option is likely to have a positive minor effect on the economic objectives of SA6. In comparison to Development Option 1, the potential safeguarded business development area would have better access to the planned employment opportunities at North East Bexhill, although the closer proximity is not considered sufficiently beneficial to result in a difference in the effects on the economic objectives of SA6 due to the accessibility that will be afforded by the North Bexhill Access Road.</p>

²An average of 40sq.m per worker is assumed as per the Hastings and Rother Employment Strategy and Land Review Update (August 2011)

SA Objective	Commentary
<p data-bbox="165 778 215 807">SA7</p> <p data-bbox="237 711 405 879">Improve accessibility to services and facilities for all ages across the District</p>	<ul data-bbox="456 261 1995 1054" style="list-style-type: none"> • The Development Option puts forward a form of development that in the main would be well-related to the existing settlement edge and the planned development at North East Bexhill. It therefore offers a location where the new homes would be physically connected to existing and allocated residential areas, the allocated business development areas and the existing facilities these areas provide. These facilities include the existing sports ground at St. Mary's Lane, the district shopping/service centre at Sidley and the local schools. However, the proposed residential development parcels located to the west of St. Mary's Lane would be remote from both the existing settlement edge of Bexhill and remainder of the residential development put forward by the Development Option 3. • It is considered that the Development Option would have scope to provide some local services on-site, such as a local shop, a doctor's surgery, nursery or community hall. The Development Option could also accommodate a new primary school, although this would likely have an impact on the total number of dwellings it could accommodate. Equally, the Development Option would be required to make contributions to help support and improve local infrastructure, including schools and highways. • The western and southernmost parts of the Development Option would be served by existing bus services along Ninfield Road, whilst the relationship of the development parcels with the North Bexhill Access Road means that the introduction of any new bus services along its route would ensure that the remainder of the Development Option would be well served by public transport. • The Development Option provides the opportunity to enhance the existing public footpath network within the Study Area. They could be appropriately surfaced to ensure year-round use and widened to accommodate cyclists. The Development Option also establishes how a network of new recreational routes could be extended to the existing public footpaths within the Study Area to create traffic-free connections to the Combe Valley Countryside Park and the existing public rights of way that abut the Study Area. • The implementation of the Development Option would secure appropriate provision or developer contributions for the timely delivery of infrastructure needs associated with the new development in accordance with Policy IM2 (Implementation and Infrastructure) of the Rother Local Plan Core Strategy and the latest Infrastructure Delivery Plan. • The timely delivery of the North Bexhill Access Road creates the basis for an accessible new development. The Development Option locates potential new business development adjacent to North Bexhill Access Road due to the good accessibility afforded by the road. The Development Option does not preclude the delivery of other local service and facilities within the most accessible parts of the development. • The delivery of up to 630 new dwellings and in the order of 189 new jobs would help to support the continued viability of services in the local area through direct and indirect jobs linked to the construction of the Development Option, additional retail expenditure locally and additional Council Tax and business taxes. <p data-bbox="456 1098 562 1118">Summary:</p> <p data-bbox="456 1126 1995 1326">The Development Option puts forward a form of development that in the main would be well-related to the existing settlement edge and the planned development at North East Bexhill, although the residential development areas to the west of St. Mary's Lane would be remote from both the existing settlement edge and the rest of the Development Option. The Development Option also utilises the existing public footpaths and a network of new recreational routes to maximise accessibility to the existing and planned settlement edge and therefore the facilities provided within them. The Development Option would deliver the timely delivery of infrastructure needs associated with the development, not least the provision of new areas of public open space that would accommodate a range of new outdoor uses/facilities. However, at this stage the full scope community facility provision to be provided is not fully known. Therefore, it is concluded that the Development Option supports the objectives of SA7, although the benefits would be relatively limited in scope/scale and only have a minor effect.</p> <div data-bbox="2024 746 2074 791" style="text-align: right;">  </div>

SA Objective	Commentary
<p data-bbox="165 571 215 600">SA8</p> <p data-bbox="237 501 418 671">Encourage and facilitate increased engagement in cultural and leisure activities</p>	<ul data-bbox="461 288 1984 711" style="list-style-type: none"> • The new housing development is likely to increase the catchment (and demand) for cultural and leisure activities, and hence stimulate and facilitate activity. • The Development Option would secure the provision of approximately 44 hectares of green infrastructure that could be brought into the public realm. This green infrastructure has the potential to secure a range of leisure activities including providing new routes for walking, jogging and cycling, areas for informal sports games and new children’s play facilities. The connected network of open spaces established by the Development Option means that all the new homes would be within easy reach of these new facilities. • The Development Option would be well-connected to existing and new pedestrian/cycle routes which would provide links across the Study Area giving access to the Combe Valley Countryside Park and other areas of countryside. • The principles of vehicular access and pedestrian/cycle connectivity illustrated by the Development Option would create the basis for a well connected and permeable development that would afford good access to new community facilities. • Subject to viability, the Development Option would secure new green infrastructure and community facilities through appropriate provision or developer contributions in accordance with Policy IM2 (Implementation and Infrastructure) of the Rother Local Plan Core Strategy and the latest Infrastructure Delivery Plan. • The potential business development area accommodated within the Development Option could accommodate new cultural enterprises/organisations. <p data-bbox="461 788 562 810">Summary:</p> <p data-bbox="461 817 1957 900">The new development could increase the catchment for cultural and leisure activities in the town. The delivery of new public open space would assist in delivering new leisure activities, such as walking, cycle, sports pitches and children’s play area. As these benefits are generally limited in scope and scale, it is considered the Development Option would only have a minor effect on the objectives of SA8.</p>



SA Objective	Commentary
<p>SA9</p> <p>Improve efficiency in land use and encourage the prudent use of natural resources</p>	<ul style="list-style-type: none"> • The Development Option would result in the loss of agricultural land within Grade 3 (Good to Moderate) and Grade 4 (Poor)³. The development of any land around the built up area of Bexhill is likely to include land of a similar grade. • The Development Option shows how significant new areas of public open space could be provided to form an important new community asset that would contain new recreational routes, sports pitches and children’s play areas. Critically, the Development Option would deliver new linkages to the Combe Valley Countryside Park. The Development Option also does not preclude the delivery of other community facilities such as a community hall, a doctor’s surgery or crèche. • The Development Option applies a density standard of 28 dph. This lower density form of development is dictated by the topography of the Study Area. • As the majority of the Study Area sits on a south facing slope, the existing topography would dictate, to an extent, the creation of an east-west street pattern. Such a street pattern would maximise the number of buildings that could be orientated broadly to the south. This would maximise the opportunity for daylighting, passive solar and the use of solar panels. • The construction of the North Bexhill Access Road will create a new ‘utilities corridor’ underneath which services such as water, electricity and sewerage will run in order to serve the Development Option. <p>Summary: The Development Option comprises the development of Greenfield land, which does not meet the objective of SA9 to use land that has previously been developed. Consequently, the Development Option would result in the loss of agricultural land within Grade 3 and Grade 4, although the development of any land around Bexhill is likely to include land of a similar scale. It is envisaged that the on-site topography would allow for a development form that maximise the number of dwellings that could be orientated to the south to maximise natural daylighting, passive solar gain and the use of solar panels. However, the ability to adopt sustainable/renewable energy practices does not fully outweigh the loss of Greenfield land and therefore the Development Option partially conflicts with SA9, resulting in minor adverse effects.</p>

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³As per 1:250 000 Series Agricultural Land Classification mapping prepared by Natural England. This map represents a generalised pattern of land classification grades and any enlargement of the scale of the map would be misleading. This map does not show subdivisions of Grade 3 which are normally mapped by more detailed survey work.

SA Objective	Commentary
<p data-bbox="163 699 226 722">SA10</p> <p data-bbox="241 568 427 858">Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage</p>	<ul data-bbox="461 280 2002 751" style="list-style-type: none"> • The close relationship of the Development Option with the North Bexhill Access Road means that the new housing and potential business development would benefit from a direct connection to the Bexhill-Hastings Link Road, therefore minimising impacts on existing traffic levels within the area. The North Bexhill Access Road will provide direct and convenient connections to the business development that is planned at North East Bexhill. • The Development Option is well related to existing public footpaths, which could be upgraded to accommodate cyclists. The Development Option also accommodates a network of new recreational routes which would connect with these existing rights of ways. These new and existing routes would provide direct connections to the existing settlement edge, the adjacent countryside and the Combe Valley Countryside Park, which would encourage more sustainable movement patterns for local trips. • The western and southernmost parts of the Development Option would be served by existing bus services along Ninfield Road, whilst the relationship of the development parcels with the North Bexhill Access Road means that the introduction of any new bus services along its route would ensure that the remainder of the Development Option would be well-served by public transport. • The provision of the safeguarded business development area in close proximity of the proposed new homes would provide convenient access to new jobs, therefore promoting more sustainable travel-to-work patterns. • The implementation of the Development Option is expected to secure appropriate provision or developer contributions for the delivery of measures to mitigate traffic impacts generated by the new development. <p data-bbox="461 799 566 823">Summary:</p> <p data-bbox="461 826 2002 938">The Development Option would result in an increase to traffic and associated pollution levels. However, the planned nature of a development of this size would allow required highway mitigation measures to be delivered in a planned and appropriate manner. The Development Option would also be well-related to the existing public footpaths and provide a number of new recreational routes that maximise the connections with the existing settlement edge, which would help to encourage more sustainable movement patterns for local trips.</p> <p data-bbox="461 975 2002 1054">It is recommended that further investigation is carried out to ascertain the viability of either diverting existing bus routes or providing new bus routes routed along the North Bexhill Access Road to increase the level of public transport provision supporting the Development Option. The provision of bus services along the North Bexhill Access Road would help to minimise car usage associated with the new development.</p> <p data-bbox="461 1091 2002 1147">However, as the Development Option would increase traffic levels, albeit with the North Bexhill Access Road in place, it will not reduce road congestion and pollution levels in the wider area and therefore is considered to conflict with SA10, albeit it is likely to only result in minor adverse effects.</p>

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SA Objective	Commentary
<p>SA11</p> <p>Reduce emissions of Greenhouse gases</p>	<ul style="list-style-type: none"> • The Development Option would be served by existing bus services and benefits from a number of existing and new pedestrian/cycle connections, which would help to encourage more sustainable movement patterns for local trips, therefore helping to minimise greenhouse gas emissions. • The Development Option does not preclude the use of renewable energy generation to be provided in conjunction with the new homes and business development at the detailed design stage. • As the majority of the Study Area sits on a south facing slope, the existing topography will dictate, to an extent, the creation of an east-west street pattern. Such a street pattern would maximise the number of buildings that can be orientated broadly to the south. This would maximise the opportunity for daylighting, passive solar and the use of solar panels. • It is envisaged that the Development Option could deliver a significant net gain of new woodland and tree planting. <p>Summary: The Development Option will be served by existing bus services that presently run along Ninfield Road. Also, as mentioned above within this SA, the opportunity may exist for bus services to be routed along the North Bexhill Access Road, which would maximise accessibility to public transport and therefore help to further reduce the emission of Greenhouse gases. The proposed network of pedestrian and cycle routes would help to encourage more sustainable movement patterns for local trips. The Development Option also does not preclude the use of on-site energy generation, although the full scale of such measures would need to be balanced against viability considerations. If the above measures can be successfully implemented, then it is considered that they would help to balance the negative effects of such development on the production of Greenhouse gases.</p> <p>However, the above measures would help to minimise emissions of Greenhouse gases and reduce emissions. Therefore, the Development Option will conflict with the objectives of SA11 in that it may result in minor adverse effects.</p>

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SA Objective	Commentary
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SA12	Minimise the risk of flooding and resulting detriment to people and property	<ul style="list-style-type: none"> The Development Option does not place inappropriate development in areas of flood risk. It would provide sufficient open space to incorporate Sustainable Drainages Systems (SuDS) features to manage excess surface water run-off during periods of heavy or persistent rainfall in order to prevent flooding and avoid exacerbating flood risk off-site. 	0
		<p>Summary: The Development Option would successfully avoid areas at risk from flooding and provide sufficient open space to incorporate new SuDS measures. Therefore, the Development Option will not exacerbate flood risk. Further investigation of the potential SuDS measures may highlight that measures can be put in place to reduce existing Greenfield run-off rates, which would be a clear benefit to reducing an flooding issues that may existing downstream of the Study Area. If this can be achieved, then the Development Option could be considered to deliver positive effects to the wider area, which would increase the score.</p>	

SA Objective	Commentary
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SA13	Maintain, improve and manage water resources in a sustainable way	<ul style="list-style-type: none"> The Development Option would provide sufficient open space to incorporate SuDS features. The SuDS features would slow and hold back the excess surface water that runs off the site, allowing natural processes to break down pollutants. The Study Area is not located within a groundwater source protection zone and does not have an aquifer located underneath it⁴. The Study Area lies outside of any hydrological catchment areas. The Development Option would provide sufficient open space to incorporate SuDS features to manage excess surface water run-off during periods of heavy or persistent rainfall in order to prevent flooding and avoid exacerbating flood risk off-site. At the detailed design stage, the SuDS feature would present the opportunity to be sensitively designed, and subsequently managed, to appear as natural features within the landscape setting and provide habitat for a range of wetland species. 	
		<p>Summary: The Development Option's strong network of green spaces would provide excellent scope for incorporating new SuDS features, which would help to appropriately maintain and manage water resources in an adequate way, including breaking down pollutants. The new SuDS features would also present the opportunity to be sensitively designed to provide both landscape and ecological benefits. Beyond these on-site benefits, the Development Option would not deliver any wider benefits for the wider area and therefore it is considered to support this objective, albeit it would only have a minor positive effect.</p>	

⁴As per Environment Agency Mapping (<http://maps.environment-agency.gov.uk>)

SA Objective	Commentary
<p data-bbox="163 628 224 651">SA14</p> <p data-bbox="239 587 416 699">Conserve and enhance biodiversity and geodiversity</p>	<ul data-bbox="459 268 2000 767" style="list-style-type: none"> • The Development Option would result in residential development being located immediately to the west of Watermill Lane. This part of the Study Area is identified as having a grassland habitat that is potentially more diverse in comparison to other parts of the Study Area and therefore it is recommended to be retained where possible. Development Option 3 may allow for the loss of this grassland habitat to be replaced in the new open space to the south and south west of Ken Wood. However, this area would be remote from the existing grassland of value and therefore it may not be an acceptable mitigation measure, which would be in conflict with the BOA objective of ensuring no net loss of biodiversity as a result of the development. • Away from the grassland to the west of Watermill Lane, the Development Option locates the development to avoid the Study Area’s principal landscape and ecology features, such as the areas of existing woodland, hedgerows and watercourses. These retained habitats are noted to likely support a range of notable and protected wildlife, including bats, badgers, dormice, birds, reptiles and amphibians. • The Development Option retains the existing areas of woodland and hedgerow within the Study Area to avoid habitat fragmentation. However, it is important to note that the route of the North Bexhill Access Road would effectively sever the Development Option from the wider countryside beyond. • The existing landscape features would be retained within areas of open space, consequently providing good opportunities for enhancement of existing landscape features to deliver a range of landscape and ecological enhancements. These areas of open space would also provide sufficient space for mitigation where existing limited lengths of hedgerow may need to be removed to allow for access between development parcels. • The Development Option would avoid harm to the on-site Ancient Woodland and retain the existing TPOs located in the south western part of the site adjacent to Ninfield Road. <p data-bbox="459 815 562 837">Summary:</p> <p data-bbox="459 842 2000 1018">The Development Option’s green infrastructure would be based upon the retention of existing landscape features, including hedgerows and areas of woodland. This approach to the spatial layout of the Development Option has created logical parcels for new development that avoid the majority of the Study Area’s biodiversity interest. However, the Development Option proposes to locate residential development directly to the west of Watermill Lane, which comprises a part of the Study Area identified as having a grassland habitat that is potentially more diverse in comparison to other parts of the Study Area. Due to concerns regarding the acceptability of providing an area of replacement grassland habitat remote from the location adjacent to Watermill Lane it is considered that Development Option 3 would have a minor adverse effect on the objectives of SA14.</p>

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SA Objective	Commentary
<p data-bbox="163 762 226 786">SA15</p> <p data-bbox="241 703 423 842">Protect and enhance the high quality natural and built environment</p>	<ul data-bbox="461 268 2007 975" style="list-style-type: none"> • The Development Option would avoid the removal of on-site Ancient Woodland, Ghyll Woodland and woodland. It would also minimise the loss existing hedgerows, although the spatial arrangement of uses provides generous areas of open space to mitigate the loss of existing hedgerow vegetation. • The location of residential development situated both to the west of St. Mary's Lane and to the north east of the new Ninfield Road/North Bexhill Access Road junction would erode the feeling of separation between the new development and The Thorne and Lunsford Cross. The Development Option retains some green space to the north of the proposed developable areas, although it is considered that the scale of this space, which could include new structural landscaping, would be insufficient in size to sufficiently maintain the feeling of separation. • The Study Area is not subject to any statutory or non-statutory designations for landscape quality. The majority of the proposed built development would be located within the parts of the Study Area that have a moderate high capacity to accommodate new development. The balance of the proposed built development would lie within parts of the Study Area that have a moderate capacity to accommodate, apart from a small section of the proposed business development land within an area that has moderate low capacity for change • The majority of the proposed development is located to the south of the NBAR, which provides a strong degree of containment. The business development land would be the only part of the proposed development located to the northern side of the NBAR. • The majority of the proposed residential development would lie on a south facing slope, which together with existing and new landscaping to the north, would serve to contain the proposed development from the wider area. The Development Option would therefore be well related to the existing edge of Bexhill. • New landscaping along the boundaries of the Study Area and the supplemental planting of the existing hedgerows and woodland would help to assimilate the development into the surrounding landscaping. • The Development Option therefore could be developed without significant effects on views from the surrounding area or harm to the wider landscape character. • The Development Option would respect the setting of the listed buildings at Preston Hall by retaining the existing vegetation that runs along the Combe Haven. • The Development Option would also retain an area of open space between the proposed residential development area and the listed buildings, which would allow for early landscaping to increase screening. This buffer will help to minimise effects of the proposed development on the listed buildings. <p data-bbox="461 1007 566 1031">Summary:</p> <p data-bbox="461 1038 2000 1150">The Development Option puts forward a landscape-led solution which would be largely contained by the North Bexhill Access Road, existing topography and landscaping. Therefore, the Development Option would be contained within the wider landscape to the north and would be well-related to the existing settlement edge. Within the Study Area the Development Option would work around the existing hedgerows and woodland, retaining generous areas of open space to offer good scope to reinforce these existing landscape features and therefore help to mitigate landscape impact.</p> <p data-bbox="461 1182 2000 1270">However, the Development Option would result in coalescence with the adjoining settlement at The Thorne and Lunsford Cross due to the proposed residential development located both to the west of St. Mary's Lane and to the north east of the Ninfield Road/North Bexhill Access Road junction. Therefore, it is considered that the Development Option would have a potentially adverse effect on landscape character.</p>

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SA Objective	Commentary	
SA16	<p>Reduce waste generation and disposal, and achieve the sustainable management of waste</p>	<ul style="list-style-type: none"> The Development Option would result in some increase in waste generation, but would be limited by the geographic focus of the new growth. Also, Rother District Council adopts sustainable management policies.
		<p>Summary: The inherent increase in waste generation means that the Development Option would not reduce waste generation, but the adoption of sustainable management policies would help to minimise waste generation. For this reason the Development Option cannot reduce waste generation and therefore conflicts with the SA and may result in minor adverse effects.</p>

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