

Rother Local Plan (22 Jul 24)

1. Rother has issued its draft Local Plan (Reg 18) for the Scrutiny Committee along with two supporting documents.

2. The main document is 425 pages, with Rye mentioned specifically on 50 of them, therefore there has been much to consider in the 202 questions.

3. Rye has noted the Rother planning time sequence as below.

4 March 24	Rother Cabinet asked to approve the Regulation 18 Document and to consider the comments of this Overview and Scrutiny Committee.
12 weeks after March (23 July 24)	Subject to the decision of Cabinet, the consultation version of the Local Plan will progress to Regulation 18 consultation for a 12-week period.
April onwards	Council will then develop the Regulation 19 version of the new Local Plan, (known as the 'pre-submission' version) and consult
Spring/Summer 2025?	Pre-submission version published in early 2025? That version will be the one which the Council puts forward for Examination. Consult and submit to the Secretary of State for Examination along with the proposed draft Local Plan.
Summer 2026?	If sound, then Full Council invited to adopt

4. Once adopted, the Local Plan will, together with "made" and reviewed neighbourhood plans, form the Development Plan. It will supersede the 'saved policies of the adopted Local Plan 2006, the Rother Local Plan Core Strategy (2014) and the Development and Site Allocations Local Plan (2019)."

5. The Local Plan must take account of, but not merely repeat:

a. National Planning Policy Framework (NPPF - sets the overarching planning policy) and the requirements for local housing and economic development, balanced against heritage, landscape and environmental protections. See below for the summary of the Labour government's intentions.

b. government's Planning Practice Guidance (PPG);

c. other national policy guidance from statutory organisations such as the Marine Management Organisation, Natural England, National Highways and the Environment Agency.

6. Emerging Government Policy: The Chancellor has summarised a series of bullet point measures, which she said will be elaborated by the SofS for Housing, Communities and Local Government.

* Restore mandatory housebuilding targets, but the government will not be increasing housebuilding by central decree. "It will still be, in the first instance, up to

local communities and local authorities to decide where housing is built,” she said. But we will bring back mandatory targets so the answer cannot always be no.”

- * Build 1.5m homes by the end of this parliament - including affordable and council homes. Letters coming from D PM to Councils
- * End the onshore wind farm ban
- * Create a new task force to accelerate stalled housing sites
- * Support local authorities with 300 additional planning officers across the country
- * Review planning applications previously turned down that could help the economy
- * Prioritise brownfield and greybelt land for development to meet housing targets when needed
- * Reform the planning system to "deliver the infrastructure that our country needs" Revise NPPF.
- * Set out new policy intentions for critical infrastructure in the coming months.

7. Rother Planners have said that they have yet to receive the letter from the SofS, but will need time to consider the implications and impacts on the emerging Plan before they engage with others including Neighbourhood Planning Groups. In the meantime they are progressing with the revision of the Rother Local Plan.

8. Concurrent with this work, Rye is reviewing its Neighbourhood Plan. To date it has held 5 Steering Group meetings; organised a mini public consultation and completed a site reassessment review, which has been shared with Rother Planners. The detail is reflected in the HELAA.

9. Rother Draft Policies (P15 and 16) are categorised under the following chapter headings:

- Green to the Core
- Live Well Locally
- Development Strategy and Principles
- Health and Well-being
- Infrastructure
- Housing
- Economy
- Landscape Character
- Environmental Management
- Heritage

10. At its Planning and Townscape meeting on Monday 22 July, Council endorsed the Rye comments as below.

Intro P14	Flood risk is mentioned. At the confluence of three rivers and tidal waters, Rye is affected by all flood risks, including ground, surface and spring water. Rye would like to be consulted about the next Rother Strategic Flood Risk Assessment.
Vision. P17\18 Q1	<p>Rye agrees the vision, but underscores that “sustainable” must take full account of the 1987, the United Nations Brundtland Commission definition of sustainability as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.”and demonstrate a full consideration of all the three factors:</p> <p>Social factors: all aspects of social well being, personnel services and support, from medical to transport, access to leisure facilities. Rye does have an advantage that most parts are “walkable” within 20 minutes.</p> <p>Environmental factors: the allocation for development of Brownfield sites first; maintenance of the development boundary; consideration of flood risk and the protection of bio diversity which surrounds Rye. Design should embrace eco friendly materials, energy, water efficiency, safety and security. There is a need to protect river and marine aquacultures (blue carbon) from plastic and other toxic pollution. Sewage outfalls and spills have to be eradicated. All green infrastructure, including salt marsh, which provides carbon absorption, needs to be protected and enhanced. Air pollution is a particular problem near the A259. Conservation policies should be strictly applied to protect character and heritage. With traffic and parking a major issue, any measure which aggravates it must be avoided.</p> <p>Economic factors: there is the green economy and technology, including heat insulation. Food security is high on the political agenda, as is infrastructure for EVs. Reduction in power use is a priority along with the greater use of sustainable power such as solar, wind, and geo-thermal systems. Single use plastic must be reduced. Locally, more could be made of green tourism. Importantly, there should be accessible local facilities for recycling, re-purposing, composting and bulk waste</p>
P19 - 23 Q2/3	<p>Rye endorses the two big policies and represent the major change from the 2006 plan.</p> <p>What does Green to the Core mean? P19</p> <p>Being Green to the Core means considering the impact of all planning decisions on the climate emergency, the biodiversity crisis and the High Weald Area National Landscape. It means:</p>

	<p>contributing to the radical reduction in carbon emissions required by national planning policy through planning for sustainable transport, net zero housing and renewable energy and playing a key role in the UK's nature recovery and carbon sequestration through enhancing our landscape and environmental assets.</p> <p>What does Live Well Locally mean? P21</p> <p>The Live Well Locally concept means considering, when making all planning decisions, the goal of creating: Healthy, sustainable and inclusive communities <i>that support residents across the age spectrum in terms of housing, access to jobs, services and facilities</i>. 'Connected and compact neighbourhoods' in our towns with 'village clusters' in our rural locations, where people can meet most of their daily needs within a reasonable distance of their home, with the option to walk, wheel, cycle (active travel) or use public transport. New development that creates places that are not just visually appealing, but also inspire and foster a sense of belonging, identity, and shared experience.</p> <p>Rye has some small comments</p> <p>4.3“.....Wheeling”. Why this new term? We asked 10 people if they knew its meaning, none did.</p> <p>LWL1: Please use acres as well as, or instead of, hectares.</p> <p>“urban”: is this defined somewhere in the Plan? Ditto “suburban”</p> <p>In “Green to the Core” there is mention of the impacts on the High Weald AONL but not National and International Habitat Designation Areas. Should the latter be added?</p>
P26 Q4 and 5	See also P14: Rye - As a town affected by all forms of flood risk and land instability, Rye would like to see inclusion of “ to mitigate all flood risks” in the objectives.
P28 to P57: Q2 to Q10	<p>Rye endorses the policies/priorities, but retains a close interest in proposed policy GTC9: High Weald National Landscape (AONL – Formerly AONB)</p> <p>“Development within the High Weald National Landscape (should be small-scale, in keeping with the landscape and settlement pattern, and designed in a way that reflects its nationally-designated status as landscape of the highest quality.”</p>

	This policy would have an impact on any proposal beyond the Rye development boundary which encroaches into the AONL. What is small scale? Is the proposal for the Rye Hill (sheltered accommodation) development, small scale?
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From P 38/39 Q11/12	Proposed Policy GTC3: Construction Materials and Waste Rye agrees
From P 40/41 Q13/14	Proposed Policy GTC4: Water Efficiency Rye: Water usage policies could be stronger? Should not grey water (for use in irrigation or flushing WCs) and permeable surfaces be strongly encouraged?
Q15/16	Proposed Policy GTC5: Heat Networks Rye agrees
From P 44 Q17/18	Proposed Policy GTC6: Renewable and Low Carbon Energy Rye notes – “Proposals for community led initiatives, including those proposed through Neighbourhood Planning should be supported.
From P 47/48 Q20/21	Proposed Policy GTC7: Local Nature Recovery Areas “The Environment Act places a duty on Local Authorities to have regard to its Local Nature Recovery Strategy – to create more, bigger, better and connected areas of wildlife-rich habitat benefiting nature and people.” Rye - RNP includes policy on Local Green Spaces, allotments, community garden and planting. It is proposed to include offsetting salt marsh policy. Should strategic gaps be preserved for wildlife and habitat? Currently the Rye Strategic Gap is mown and drained, which destroys ground nesting birds and other wildlife.
From P 50/52 Q22/24	Proposed Policy GTC8: Biodiversity Net Gain “Development will demonstrate through a Biodiversity Gain Plan that measurable and meaningful net gains for biodiversity will be achieved and will be secured and managed appropriately.”

	Rye: important to counter any loss of salt marsh as per Eastern Rother Tidal Walls Scheme.
P57 Q25/26	Rye - HWNL – should be preserved and development strongly resisted.

From P 58 to 64	<p>Proposed Policy LWL1: Compact Development</p> <p>Rye - “Compact form of Development....” likely to encourage cramped 'battery hen' environments? Better to describe in terms of housing density? “Development proposals must meet the minimum density in the ranges above....” and “Densities in excess of the maximum will be encouraged within these zones....” A Developer's Dream! Please remove “must” and “will”.</p> <p>P61: Density needs discussion? 45 to 75 outer to 60 to 90+ inner.</p> <p>P64 Q27: Compact Development is undefined, which could benefit the Developer. It conflicts with the concept of “Live Well Locally” if the density is too great.</p> <p>P64 Q28: As per Q27, “Types and Densities” should be as spacious as possible. If developers cannot (or say that they cannot) profitably develop a site, then other schemes (as per Icklesham, to which we aspire to in Rye) must be investigated.</p> <p>P64 Q29: Emphasis should be on requirements for local people, not on expensive gated developments.</p>
From P 65	<p>Proposed Policy LWL2: Facilities & Services</p> <p>Rye: P67 Q30: Requirement for new facilities for developments over 150 dwellings unlikely to apply to Rye. Rail services are beyond the control of RDC.</p> <p>All developments should be required to provide or contribute towards improved local services, not only those of 150 dwellings or over – in Rye just 20 dwellings can stretch the services!</p> <p>P67 Q31: See Q30.</p>

	<p>P67 Q32: From a Rye and the Eastern Cluster of Villages point of view, the 800m maximum walk is not really applicable.</p>
From P 69	<p>Proposed Policy LWL3: Walking, Wheeling, Cycling & Public Transport (Off site). Rye:</p> <p>P73 4.29: "wheeling" ?</p> <p>P74 Q33: All very laudable, but likely to be one of the casualties of the developer's challenges of Planning Decisions.</p> <p>P74 Q34: No comment.</p> <p>P74 Q35: Very laudable, but unlikely to be possible or desirable in all cases.</p>
From P 75	<p>Proposed Policy LWL4: Walking, Wheeling, Cycling & Public Transport (Within the Site)</p> <p>Rye:</p> <p>P78 Q36: All well and good on level or fairly level sites. Access for Emergency Vehicles must be a priority.</p> <p>P78 Q37: No comment.</p> <p>P78 Q38: Reliant on public initiative and support? Finance from where or by whom?</p>
From P 79	<p>Proposed Policy LWL5: Distinctive Places</p> <p>P81: "The Council will support proposals that adopt community stewardship models of governance, such as informal community management groups, neighbourhood planning groups, community management of public spaces, community management of buildings and facilities, community management of local energy networks, community land trusts and community housing such as cooperatives and co-housing, that give the community a key role and stake in the ownership and management of community assets and green infrastructure. The Council will also support proposals that reinvest the surplus generated by community assets and green infrastructure into the community, such as through community funds, grants, or dividends."</p> <p>Rye:</p>

	<p>P84 Q39: Will require stringent Planning Control.</p> <p>P84 Q40: No comment.</p> <p>P84 Q41: Useful only if the developer is held to the Rules & Regulations, otherwise just aspirational.</p>
From P 85	<p>Proposed Policy LWL6: Built Form</p> <p>Rye:</p> <p>P88 Q42: Acceptable.</p> <p>P88 Q43: No. Q44: Should not be over-riding.</p>
From P 89	<p>Proposed Policy LWL7: Streets for All</p> <p>Rye:</p> <p>Policy LWL 7 “Streets for all”, is contradictory as the desire for “Animated Streets” with public art, cultural installations conflicts with the desire to reduce street clutter.</p> <p>P94 Q45: All acceptable.</p> <p>P94 Q46: No.</p> <p>P94 Q47: Most are only aspirational.</p> <p>P94 Q48: Acceptable, but see Q50.</p>
From P95	<p>Proposed Policy LWL8: Multimodal Parking</p> <p>Rye:</p> <p>P97: Dropped kerbs could be positioned in key places other than buss access points to enhance accessibility. At present there ae makeshift tarmac inserts in some places which are both unsightly and can be dangerous as they do not present an even ramp.</p> <p>P100 Q49: Public opinion is against electric scooters and some electric bikes. For towns where there is little space or pavements, why encourage them?</p> <p>P100 Q50: Keep these small and localised, not large and remote.</p> <p>P96: Should the minimum space allocations be revisited?</p>

<p>P100 to 113</p>	<p>Rye endorses the spatial strategy and welcomes the term for the Rye sub area “Rye and village cluster” rather than just “rural Rother”. The draft acknowledges correctly the role of Rye as a service centre for its “cluster” in Eastern Rother.</p> <p>“Rye and Battle will be the centre of clusters of settlements that collectively provide what most residents need for their daily lives. Rye and Battle will continue to be key transport and community hubs, with improved active and public transport, better connecting the cluster of settlements to the towns. There are opportunities for sensitive growth in these clusters <i>alongside new facilities and services</i> for both new and existing residents to benefit from.”</p> <p><i>“The strengthened connections to Rye as a sustainable market town, will allow for sensitive development in adjoining villages.”</i></p> <p>Rye: All this points to Rye strengthening its vital infrastructure to efficiently support a growing population in Rye and surrounding villages. More work and resources are required to ensure infrastructure, particularly medical and youth services, matches development.</p>
<p>P138</p>	<p>Rye welcomes the Vision for Rye and the Eastern Settlements Cluster and endorses the acknowledgement of the serious constraints on development, as in earlier plans.</p> <p>In earlier text. “Bio; geo and flood risk constraints were all included in the important 2006 Local Plan text below”</p> <p><i>“Rye – Old Text: The location of development should respect the close relationship to landform and landscape setting. Much of the land that surrounds Rye is within a flood risk area and also, if developed, would severely detract from the setting of Rye. These factors constrain further growth and any extension of the ribbon development and other development on the levels needs to be resisted. The capacity of the town to take significant additional traffic is also limited in environmental as well as physical terms.”</i></p> <p>Rye -New text reflects the serious constraints on development in Rye.</p> <p>“The important historical character of Rye will be preserved and enhanced, maintaining a strong retail and services core with access to sustainable green tourism and leisure opportunities. <i>Areas at risk from flooding and sensitive environmental areas will be protected from inappropriate development and the high-quality biodiversity and landscape designations will be sensitively</i></p>

	<p><i>managed and enhanced</i>, including community access, through biodiversity net gains from development.</p> <p>The key employment areas within Rye Harbour will be retained, along with other commercial areas across the town. This includes maintaining the viability of the Port of Rye as a <i>working harbour</i>, while having regard to protecting the integrity of internationally designated habitats. Key tourism areas such as Camber will be promoted through improved accessibility to reduce the dependency on the car, including better utilisation of existing cycle and pedestrian routes.</p> <p>The eastern cluster of settlements will be <i>better connected by sustainable transport</i> infrastructure, with Rye acting as a key transport hub, and local economies will continue to grow, respecting the historic development pattern of rural communities over time. The strengthened connections to Rye as a sustainable market town, will allow for sensitive development in adjoining villages”</p>
P139- 140	Development Target Comparison, please see below for reconciliation.

A comparison of RNP and Rother draft plan numbers are below.

RNP	RNP Numbers as at 2019
Rye/Rye Harbour	355-400 dwellings over the period 2011-2028
Homes built	198 dwellings
Outstanding planning permission	28 dwellings
Windfall sites allowance	22 dwellings
Residual requirement	107–152 homes for Rye and Rye Harbour in 2019
Expected housing allocations in Rye Harbour Rother Plan P143	40 homes
Outstanding	67 – 112 dwellings (April 2016-March 2028) as at 2019
Current RNP Breakdown	TG H3 – around 20
RNP and Local Plan	WRW H6 – 35? (plus convenience store)

	<p>WRE H5 - 10</p> <p>RC A – at least 30</p> <p>Freda Gardham H7 – at least 30</p> <p>LSS 50 H8 – 50 to 88</p> <p>New Rd B3 - Nil</p> <p>Tower St Windfall - 6</p> <p>Rye Hill (Rye Foreign) – 34 (but on AONL?)</p> <p>Sub Total = 205</p>
RNP Allocations	at least 205
Draft Rother Plan	Rother Numbers
New Targets P139	181+37 = 218 (Includes Rye Hill)
Difference	<p>The greater number (13) in the Rother Plan is considered achievable by higher numbers on sites allocated in the RNP. RNP numbers were set cautiously because of the challenge of developing mainly brownfield sites.</p> <p>Bottom line: Numbers are acceptable.</p>

P144	<p>“The settlements within the eastern part of the district depend on Rye for wider facilities and services. Rye also functions as a key transport hub for travel outside of the district. While some of these settlements link radially to Rye, there is also a network of settlements which form a cluster.....with Rye as a key destination.</p> <p>It is desirable that the Rye cluster is supported by <i>enhanced bus services</i> through the development strategy of the Local Plan.”</p>
“Eastern Settlements –	“This workwill be developed after the Regulation 18 consultation stage. In seeking to maximise its potential supply, the Council wish to receive feedback through this Regulation 18

<p>development and transport”</p> <p>P144 and 145</p> <p>Q62 – Q63</p>	<p>consultation on the opportunities for development that are proposed, and to develop its evidence base to support the most suitable and sustainable sites coming forward for development.”</p> <p>Rye has carried out a detailed site reassessment, using data from the initial work on the Rye NP, but updated to early 2024. This data has been passed to Rother Planners and it is noted that it has been reflected in the HELAA.</p> <p>The reassessment reflects the serious constraints on future development in Rye because of the reasons in P138.</p>
<p>P163 Q71 and Q72</p>	<p>Housing growth to 2040</p> <p>Rye – Given the constraints, RNP allocated mainly brownfield sites: because of the conservative assessment of development potential in the Rye NP, new targets remain achievable and manageable</p>
<p>General Development P166</p> <p>Q73 onwards</p>	<p>Rye agrees: “In addition to considerations set out by other policies, all development should meet the following criteria:</p> <ul style="list-style-type: none"> -To meet the needs of future occupiers, including providing appropriate amenities and the provision of appropriate means of access for disabled users; -Not to harm the amenities of adjoining properties; -To respect and not detract from the character and appearance of the locality; -To be compatible with both the existing and planned use of adjacent land, and to take full account of previous use of the site.”
<p>Development Strategy</p> <p>P166 to 180</p> <p>Q84 – Q86</p>	<p>Proposed Policy DEV1: General Development Considerations P166</p> <p>Rye - Sustainable development and the presumption of sustainable development must include a full consideration of all three key factors described in the comments on P17/18.</p> <p>Proposed Policy DEV2: Comprehensive Development and Master planning P168</p> <p>Proposed Policy DEV3: Development Boundaries P171</p> <p>Rye: Development boundary constrains development by avoiding development on protected bio diversity and flood risk. Potential risk is “that until a five-year housing land supply is demonstrated, the presumption in favour of sustainable development applies, and as a consequence pressure may exist to extend settlement</p>

	<p>areas.” Rye would argue against this, because of the natural constraints.</p> <p>Proposed Policy DEV4: Retention of Sites of Community or Economic Value</p> <p>Rye agrees</p> <p>Proposed Policy DEV5: Development on Small Sites and Windfall Development P178</p> <p>Rye agrees</p>
<p>Strategic Gap</p> <p>P180</p> <p>Q85 -86</p>	<p>Proposed Policy DEV6: Strategic Green Gaps P180</p> <p>Rye strongly endorses the retention of its strategic gap. It is not only a separation between Rye and Rye Harbour , which aids the preservation of the character of Rye when viewed from the South, but is also salt marsh/water meadow with protected bio diversity.</p>
<p>Health and Wellbeing</p> <p>P 183 to 203</p> <p>Q87 – Q98</p>	<p>Proposed Policy HWB1: Supporting Health and Wellbeing P183</p> <p>Rye:</p> <p>HWB1 and HWB4 - Additional health care resources must accompany all new development.</p> <p>Proposed Policy HWB2: Health Impact Assessments P186</p> <p>Proposed Policy HWB3: Reducing Harmful Impacts on Health P189</p> <p>Proposed Policy HWB4: Community Facilities and Services P192</p> <p>Rye agrees the policy as it would support the sort of initiative taken by the Community to organise its own Covid Vax Centre in a community centre. NHS England facilities were planned at up to 40 minutes drivetime away. Some 65000 vaccinations have been delivered in Rye over a 2.5 year period.</p> <p>Proposed Policy HWB5: Green and Blue Infrastructure P196</p> <p>Q96 – 100: Rye strongly supports the policy. In the Rye NP review we are looking to categorise key green spaces in the Parish as “Local Green Spaces” for additional protection.</p> <p>Proposed Policy HWB6: Public Rights of Way P200</p>

	<p>Rye - Public rights of way entering Rye need to be linked across the Town urban area to clarify public routes and access. At present, rights tend to cease on the edge of the Town boundary. Rye is hoping that the new King Charles Way will be the first way to be linked across Rye.</p> <p>Proposed Policy HWB7: Combe Valley Countryside Park P203</p>
<p>Infrastructure P206 to 211 Q104 to Q108</p>	<p>Proposed Policy INF1: Strategic Infrastructure Requirements P208</p> <p>Rye: could be superseded by the new Government’s planning policy?</p> <p>Proposed Policy INF2: Digital Connectivity P211</p> <p>Rye agrees.</p>
<p>Housing P213 to 292 Q109 – 113</p>	<p>Rye - Please see earlier remarks about “sustainable development”. P18.</p> <p>Proposed Policy HOU1: Mixed and Balanced Communities P214</p> <p>Rye - HOU1 (iii) One of the most pressing priorities in Rye is the need for affordable and social housing. With around one fifth of the stock in Rye now second homes or buy to let, developers must not be allowed to argue on viability grounds (using their own procured studies) that schemes cannot provide.</p> <p>Rye understands that there is a second homes/AIRBnB study under way for Hastings and Rye. Rye would welcome input to that. As there is a range of measures under consideration in other areas of the Country, a priority should be registration so that this type of holiday accommodation can be safety regulated.</p> <p>The Community tell us all the time that there are few options for young people in the hospitality industry, on which Rye depends, on minimum level wages to live. All options must be considered including perhaps blocks of single bedroom units for shared ownership, lease or purchase. This requirement is a higher priority to units for older people.</p> <p>Proposed Policy HOU2: Affordable Housing P222</p> <p>Rother retains control of numbers (mainly around assessment of viability) of “Affordable housing, the exact mix of housing sizes and types shall be identified <i>through discussions</i> with the District</p>

<p>Design Codes for custom build</p> <p>P265</p>	<p>Council. The starting point for discussions is that the majority of dwellings for social or affordable rent and First Homes shall be of one and two bedrooms and the majority of intermediate affordable dwellings for sale shall be of two and three bedrooms, subject to identified local affordable housing needs;”</p> <p>Proposed Policy HOU3: 100% Affordable Housing Developments P229</p> <p>Policy HOU4 Q116- 117: Allocating Sites for Wholly or Substantially Affordable Housing P232. Yes</p> <p>Proposed Policy HOU5: Rural Exception Sites P234</p> <p>Rye : No view.</p> <p>Proposed Policy HOU6: Sub-division of Dwellings, and Houses of Multiple Occupation (HMOs) P237 Q120</p> <p>Rye: To be considered on a case by case approach.</p> <p>Proposed Policy HOU7: Residential Internal Space Standards P243 Q122 – 123 Rye agrees</p> <p>Proposed Policy HOU8: Access Standards P244 Q124-125</p> <p>Rye agrees</p> <p>Proposed Policy HOU9: Specialist Housing for Older People P248 Q126</p> <p>Rye does not agree that the trickle down concept works. In Rye, as a generalisation, older people prefer to remain in their homes. Therefore the tendency is for homes built specifically for older people are taken up by incomers.</p> <p>Proposed Policy HOU10: Residential Care Homes for Older People P255</p> <p>Rye : agree on case by case basis</p> <p>Proposed Policy HOU11: Gypsies, Travellers and Travelling Showpeople Criteria P258</p> <p>Proposed Policy HOU12: Self-Build and Custom Housebuilding P262 Q132 – 134</p>
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	<p>Rye has seen limited demand for custom build. Rother planners should advise the numbers on the Rother register.</p> <p>“A Design Code should be prepared by the plot provider at the outline planning stage and should provide the Council as well as potential self and custom housebuilders with a clear set of design rules and parameters that future development will have to comply with.” (This if the only reference to design code?)</p> <p>Proposed Policy HOU13: New Dwellings in the Countryside P268 Q135 - 138</p> <p>Rye : no view</p> <p>Proposed Policy HOU14: External Residential Areas P273 Q139 – 141</p> <p>Rye agrees policy</p> <p>Proposed Policy HOU15: Extensions to Residential Gardens P278 Q142 – 143</p> <p>Rye agrees</p> <p>Proposed Policy HOU16: Extensions, Alterations and Outbuildings P280 Q144 – 145</p> <p>Rye agrees but considers that flat roofs should be avoided as they do not fit with existing historical roofscapes. The impact on the amenity of others should be a main consideration.</p> <p>Proposed Policy HOU17: Annexes P285 Q146 - 147</p> <p>Rye : as for HOU16</p> <p>Proposed Policy HOU18: Boundary Treatments and Means of Enclosure P287 Q148 – 149</p> <p>Rye agrees</p> <p>Proposed Policy HOU19: Accesses and Drives P290</p>
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	<p>Q150</p> <p>Rye: As space is at premium across Rye, careful planning and pedestrian safety and lighting on junction roads is a main consideration. Should require permeable surfaces?</p>
<p>Economy P293 to 328</p>	<p>Proposed Policy ECO1: Supporting New Employment Development P296 Q152 – 153</p> <p>Rye agrees</p> <p>Proposed Policy ECO2: Protecting Existing Employment Sites and Premises P298 Q154 - 155</p> <p>Rye agrees that the key for change of use is whether or not the the existing business is viable and the importance of the business to the community. Where conversions are made then amenity of neighbours should be a major consideration.</p> <p>P300: Rye has a second supermarket proposed for an H6 allocated site on Winchelsea Road West. Rye agrees the forecast.</p> <p>Proposed Policy ECO3: Designated Town Centres P303</p> <p>Q156 – 158 (See also P400)</p> <p>The map needs refinement to reflect current business locations.</p> <p>Proposed Policy ECO4: Retail and Leisure Impact Assessments P307</p> <p>Q159 – 160</p> <p>Rye: “out of town” in the Rye context could be considered to be Rye Harbour.</p> <p>Proposed Policy ECO5: Tourism Activities, Facilities and Accommodation P309 Q161 - 162</p> <p><i>“Proposals relating to tourism activities, facilities and accommodation will be encouraged where they accord with the following considerations, as appropriate:</i></p> <ol style="list-style-type: none"> 1. <i>(i) it provides for the enhancement of existing attractions or accommodation to meet customer expectations;</i> 2. <i>(ii) it supports active use along the coast consistent with the environment;</i>

	<p>3. (iii) it develops markets for local produce, particularly that which supports land-based industries and cultural assets; and,</p> <p>4. (iv) it increases the supply of quality services and self-catering accommodation.</p> <p>Rye : Item 4 - At odds with policy on second homes?</p> <p><i>The loss of tourism activities, attractions, and visitor accommodation, currently (or last) in such use, must, be retained unless it is demonstrated that there is no reasonable prospect of its continued use. The approach to demonstrating if there is no reasonable prospect of its continued use is set out in Policy DEV4</i></p> <p>Proposed Policy ECO6: Holiday Sites P313 Proposed Policy ECO7: Agriculture Development and Forestry P318</p> <p>Proposed Policy ECO8: Agricultural Diversification P322</p> <p>Proposed Policy ECO9: Local Employment & Skills P325</p> <p>Q169 – 170</p> <p>Rye agrees</p> <p>Proposed Policy ECO10: Equestrian Developments P328 to 331.</p> <p>Q171 - 172</p> <p>Rye: no view</p>
<p>Landscape Character</p> <p>P332 to P339</p> <p>Landscape Character – conservation and enhancement</p> <p>P332 - 334</p>	<p>Proposed Policy LAN1: Rural Environments and Landscape Character P332</p> <p>“The siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it will be located, based on a clear understanding of the distinctive local landscape characteristics. Priority must be given to the conservation and enhancement of the district’s national designated and locally distinctive landscapes and landscape features, including but not limited to: The High Weald National Landscape (which is also subject to Policy GTC9). The Romney Marshes, comprising of the distinctive low-lying levels to the east of the district with particular regard to the landscape setting of Rye and Winchelsea.”</p> <p>Q173: Rye strongly agrees.</p>

where the nature of the instability has been properly assessed through a full land instability risk assessment report; and any remedial measures required to ensure that the development does not add to the instability of the site or surrounding land, are environmentally acceptable, and are normally implemented prior to the commencement of building works. The use of infiltration to manage surface water will not be allowed, unless a qualified geotechnical engineer has assessed the risk.”

(See reports of event on 26 Feb 24, extracted below. Applies particularly to any development on north side of Military Road)

Landslip onto Military Road : On Tuesday afternoon there was a significant landslip of topsoil and vegetation onto Military Road, 200 yds to the east of the Globe Inn. After the recent heavy rainfall, ground water in the Rye Hill escarpment has loosened the surface, causing several tons of debris to slip and block the road. At 0730hrs on Wednesday the road remained blocked.

There is a history of landslip in this area. Many years ago, Point Hill at Point Hill above the site of this event, had a tennis court, which slipped down towards Military Road. Several smaller landslip events have occurred since, both in the east and west of Rye.

Landslip is a risk which is recorded in the Rye Neighbourhood Plan in parts of Rye where the underlying sandstones, topsoil and vegetation is exposed to water and erosion.

To the north of the Military Road is a broad location from where spring outfalls occur, where the aquifers leak out at the base of the escarpment. Aggravated by more frequent extreme rainfall, this aggravates the risk of landslip.

<https://www.ryenews.org.uk/community/riddle-of-our-hidden-reservoirs>.

An earlier article on land instability is linked below and I will not repeat the detail here. The issue has been discussed at Rye Planning and Townscape meetings, but this latest event highlights the need to for the LPA to ensure that developers are fully aware by imposing strict conditions on any groundwork.

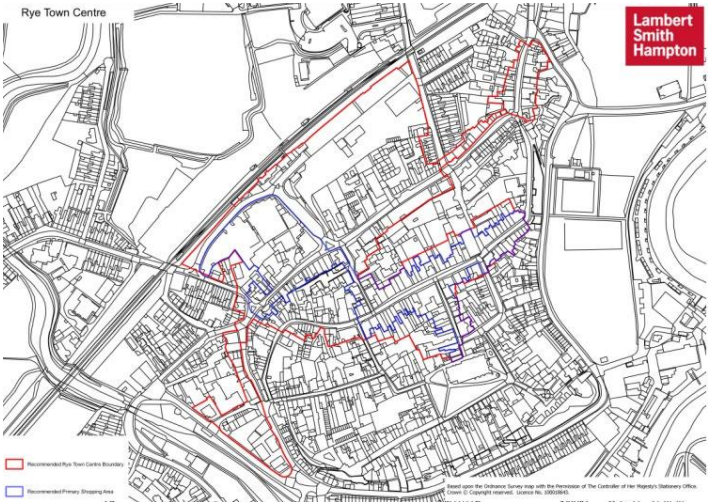
<https://www.ryenews.org.uk/news/how-unstable-is-rye>

Mike Pepler’s youtube video covers the extent of the slip.

<https://youtu.be/2JtAMHL6Kio>

It is noticeable that this latest slip occurred above an area where the base of the escarpment has been excavated and some vegetation removed. It is not too soon to link the two events and what is clear is that trees, shrubs and plants should not be

	<p><i>removed from areas where there is risk of slip as the roots help to bind the surface soil.</i></p> <p><i>Climate change indicates that we can expect more extreme and prolonged rainfall as there are changes to the Jetstream. Landslip risks are likely to increase in the future.</i></p> <p><i>It is recommended that the land stability report for this project, which accepts that there is a risk of landslip, should be reviewed and reassessed.</i></p>
P361 to 368	<p>Proposed Policy ENV4: Fairlight Cove Coastal Change Management Area</p> <p>P361 - Proposed Policy ENV5: Habitats and Species</p> <p>Q189 – 191</p> <p>Rye strongly endorses this policy as there are several protected areas surround Rye.</p> <p>P369- ENV6: Sustainable Access and Recreation Management Strategy</p> <p>Q192 – 193</p> <p>Rye agrees</p>
P372 Q194 to 196	<p>ENV7: Environmental Pollution.</p> <p>Q194 - 196</p> <p>Rye supports in general, but development proposals should address in particular:</p> <ul style="list-style-type: none"> - Noise of ground pumps – installation standards - Egress of catering business kitchen exhausts: filtered and away from adjacent dwellings. - Location of security lights and CCTV covering public areas - Recycling, not least plastic to reduce the amount of plastic and microplastic in our rivers and Rye Bay; - Road pollution of the type suffered along the A259. - Illegal dumping on “green sites” such as Harbour Road - The requirement for a bulk waste site for Rye.

<p>Heritage</p> <p>P380 to P391</p> <p>Q197</p>	<p>Proposed Policy HER1: Heritage Management P380</p> <p>Q197 – 198</p> <p>Rye: one of the key aims of the Rye NP is to preserve the character of the settlement. However there must be some flexibility to allow like for like replacement of windows and doors but incorporating thermal insulation.</p> <p>Proposed Policy HER2: Traditional Historic Farm Buildings P387</p> <p>Proposed Policy HER3: Shopfronts, Signage and Advertising P391</p> <p>Q201 – 202</p> <p>Rye: Historic shop fronts and signage must be preserved. There is a need to consider an appropriate design, colour and materials of street furniture, signage and advertising material in the Conservation Area.</p>
<p>Rye Town Measures</p> <p>P400</p>	<p>Rye Town Centre map needs careful consideration.</p> <p><i>“Rye Town Centre and Primary Shopping Area”</i></p> 
<p>Glossary</p> <p>P422</p>	<p>Rye notes definition of social housing is “affordable but with Social Rent”</p> <p>Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes</p>

	<p>provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</p>
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Impact on Rye

11. Rye welcomes the direction of this draft Local Plan. As Rye is working on its RNP review, this comprehensive draft is helpful.

12. Emerging findings of the work of the RNPSG on the made RNP (2019) should be “light touch review,” but work is under way to consider conformity with these Rother’s new policies, particularly on climate and green issues and enhanced services to match development.

13. Given that the Chancellor has indicated that there will be changes imposed by fresh government policy, detailed direction is anticipated in the Autumn from the SofS for Housing, Communities and Local Government, all of which might impact on the Local Plan and the Rye NP.

14. From our view of this Local Plan and from what we have heard about likely central changes to planning policy our assessment is that work to update the Rye NP is manageable as it would not require significant material change. Every opportunity to reference higher level policies would be taken.

15. Until the Rother Local Plan is agreed and government policy is clarified, the Rye NP should be allowed to run on as a statutory planning document.

Anthony Kimber PhD

RNP