

# Rye Neighbourhood Plan

## Evidence and Background

**Timeline: 2016 to 2028**

[www.ryeneighbourhoodplan.org.uk](http://www.ryeneighbourhoodplan.org.uk)

Version	Comments	Date Prepared	By Whom
V1	Initial draft version	RNPSG Nov 2017	ATBK/CT
V2	Reg 14 Version	RNPSG Jan 2018	ATBK
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## Section 1 - Introduction

1.1 This paper provides background to the Rye Neighbourhood Plan (RNP) and is one of a series of supporting documents as below. These papers should be read alongside the Plan.

- a. *RNP Support 1: Evidence Background Paper*
- b. *RNP Support 2: Site Assessment Document*
- c. *RNP Support 3: Consultation Statement*
- d. *RNP Support 4: Strategic Environmental Assessment and supporting sequential and exception assessments (4a)*

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## Section 2 – Approach: Vision and Objectives

### Overall Approach

2.1 The RNP Steering Group has consulted widely within the Community as it developed the Vision, the strategic objective and the detailed objectives. The process involved updating a SWOT<sup>1</sup> taken from the Rye Action Plan<sup>2</sup> and listing all current issues which arose during early public consultations. These then drove the process and when grouped suggested the themes of the Plan. The detailed process is set out in the Consultation Statement, RNP Support 3.

### Approach - Working with Others

2.2 The plan seeks to dovetail with all relevant development and regenerative plans by partner organisations, such as Local Authorities, Rye Partnership and the Environment Agency (for Harbour of Rye).

2.3 Rother District Council (DC) approved a designated planning area for the Rye Neighbourhood Plan<sup>3</sup>. Because there are areas of potential development immediately adjacent to the Town, Rother DC stipulated that Rye Town Council (Rye TC) should liaise closely with adjacent Parishes. This is formalised in a protocol, which is included in the evidence and justified on the basis that:

- a. there are some development issues which straddle the boundaries between Rye and adjacent parishes (see map 1 below), particularly between Rye and Rye Harbour; Rye and Playden; Rye and Rye Foreign.

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<sup>1</sup> [https://www.mindtools.com/pages/article/newTMC\\_05.htm](https://www.mindtools.com/pages/article/newTMC_05.htm)

<sup>2</sup> <http://www.ryetowncouncil.gov.uk/informationlocalactionplan.aspx>

<sup>3</sup> <http://www.rother.gov.uk/article/12561/Rye-Neighbourhood-Plan>

- b. it is considered important to retain strategic green areas as gaps between Parishes as now, particularly with Playden, East Guldeford, Camber and Udimore, to protect the profile of Rye.
- c. any development projects by neighbouring parish councils should benefit from an integrated environment and energy strategy for both Rye and the surrounding area.

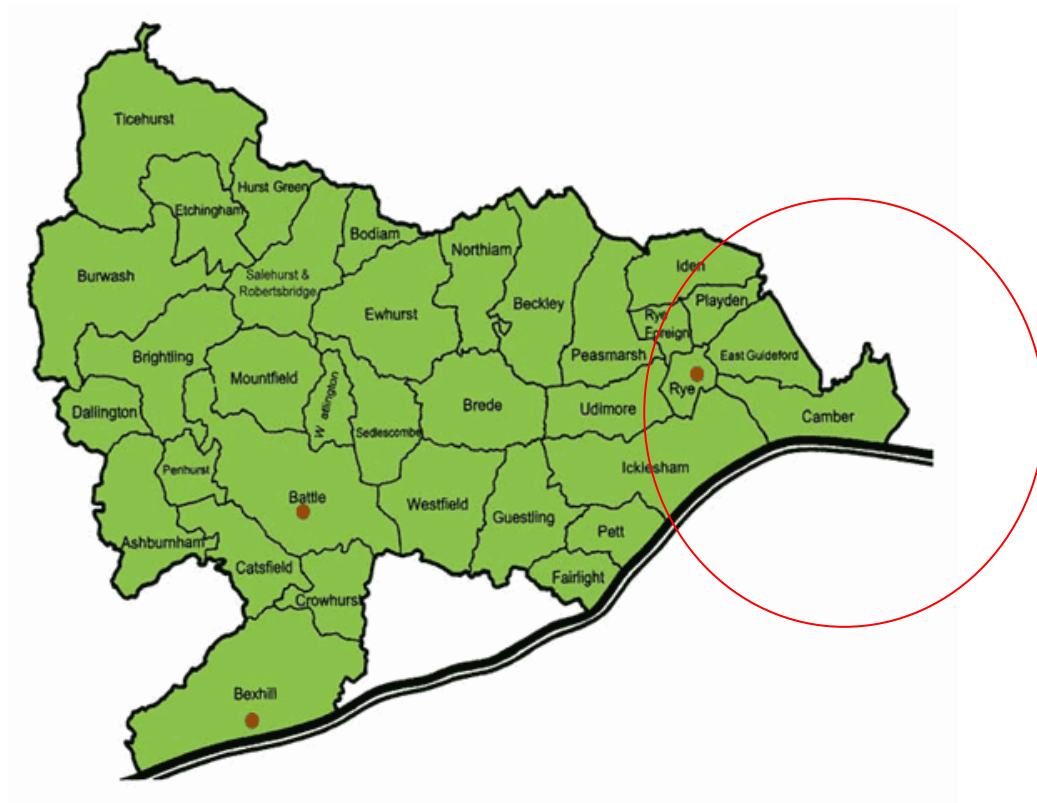


Figure 1 : Rother District showing Rye's Adjacent Parishes

## Parish Boundary Areas

2.4 The Rother DC Core Strategy<sup>4</sup> – supported locally – is to maintain a strategic gap between the Parish and parishes such as Icklesham Parish. This “gap” is a green area with designations and is seen to be important for the preservation of the profile of Rye when seen from Romney Marsh. All unauthorised development must be resisted.<sup>5</sup> For similar reasons, many oppose any further development that

<sup>4</sup> [http://www.rother.gov.uk/media/pdf/g/0/Schedule\\_of\\_Main\\_Modifications\\_to\\_the\\_Core\\_Strategy.pdf](http://www.rother.gov.uk/media/pdf/g/0/Schedule_of_Main_Modifications_to_the_Core_Strategy.pdf)

<sup>5</sup> [http://www.rother.gov.uk/media/pdf/g/0/Schedule\\_of\\_Main\\_Modifications\\_to\\_the\\_Core\\_Strategy.pdf](http://www.rother.gov.uk/media/pdf/g/0/Schedule_of_Main_Modifications_to_the_Core_Strategy.pdf)

creeps into the green areas beyond the Rye Parish boundary, where there are several designations (Main Plan maps 26 and 27) to the:

- a. North – at Hillcrest (Rye Foreign).
- b. East – along the Military Road and New Road.
- c. West – along the Udimore Road.
- d. South – along the New Winchelsea Road.

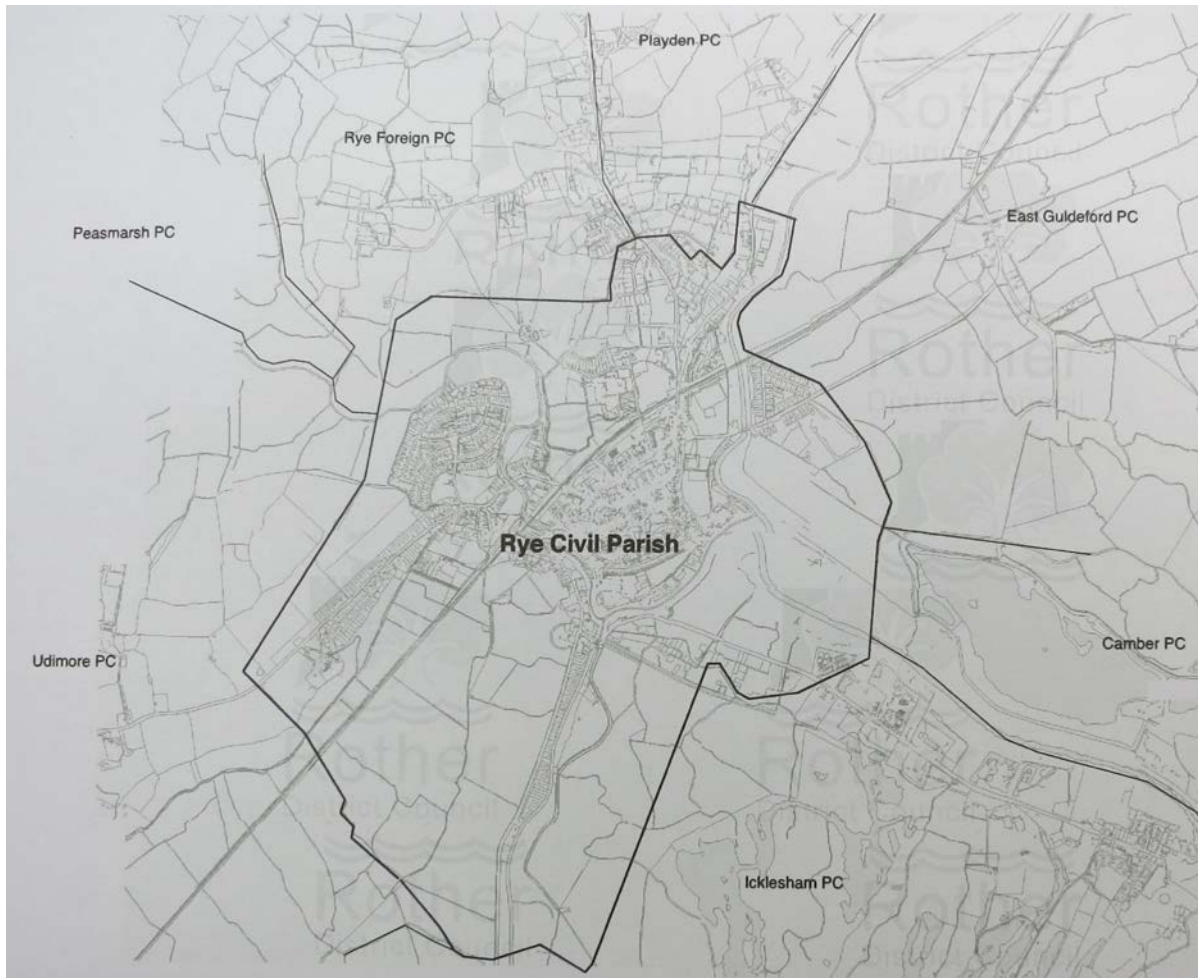


Figure 2: Rye Civil Parish with Surrounding Parishes

## **Rye Foreign**

2.5 There is planned development on the site of the Rye and Winchelsea Memorial Hospital Trust, on Rye Hill, in an area linked naturally with Rye.



Figure 3: Rye Memorial Hospital from the Southwest

2.6 The Memorial Hospital concentrates several medical facilities for the Rye area and more are proposed. As the community is dependent on the services here, it retains an interest in any future development of its services. In turn, there are also impacts on local facilities such as the Rye Community Transport and other clinics in Rye Parish.

2.7 Many see further development on the Hillcrest “green areas”, west of Old School Close of Rye Hill to be undesirable as it is would impact on Rye’s distinctive profile, when viewed from the Marsh.

### **Playden**

2.8 Any development in Playden would be seen to impact on Rye's infrastructure and would need careful coordination so that future requirements can be planned.

### **Rye Harbour**

2.9 For historical reasons, Rother DC has grouped the Rye Harbour targets for dwellings (40) and business development with Rye Parish.

2.10 There is significant commercial development at the "Saltings" and initiatives to increase commercial activity in the port at Rye. Here there are important employment opportunities with impacts for infrastructure and services in Rye.





Figure 4: Rye Harbour viewed from Rye

2.11 There is planned growth, primarily business development in Rye Harbour which increases traffic on the Harbour Road (from Rye Harbour to Rye) resulting in the need for more safety improvements.

### Literature Review

2.12 There has been a review of past plans and strategies starting from the “Rye Town Map” of 1967, by East Sussex County. This provided the basis for planning at that time although it was never formally approved.

2.13 In 1968 the Rye Conservation Area was first designated. Subsequently in 1974<sup>6</sup> the area was enlarged to the East. There was a re-appraisal in 2006.

2.14 In 1993 there was the “Rye Town Initiative”<sup>7</sup>. In the face of growing concerns about pressures on Rye by visitors and traffic, this looked at all the factors. It made sweeping recommendations. This, with the Local Area Transport Strategy of 2003, has been revisited as both have direct relevance to today’s issues.

2.15 There have been many other initiatives which have sought solutions to traffic management and flow. These include the major proposals by the Department of Transport in 1987 for an A259 bypass, followed by adoption in 1993 and subsequent withdrawal in 1996.

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<sup>6</sup> Rye Conservation Appraisal 1974 Adopted 26 November 2006; Article 4(2) Direction made 23rd February 2007 confirmed 2nd July 2007

<sup>7</sup> Rye Town Initiative 1993

2.16 Several other minor proposals (Rye Town Scheme, Rye Steps Forward, Pedestrianisation of the Strand Quay, Remedy for Rye, Proposals for Roads in Rye Citadel) dating from the mid 1980s to the early 2000s have been re-examined. Many of the measures proposed could be applied today.

2.17 Rye Partnership has initiated numerous studies and re-generation schemes, such as “Renaissance 2000” and Rock Channel briefs. Rother DC has also launched briefs and plans for the Rye Quayside<sup>8</sup> and Rock Channel from the early 2000 to 2007<sup>9</sup>. The objectives and principles from the last provide the basis for today’s work in that location.

2.18 From the same period there is the important recent work of the Rye and Rye Harbour Study (2011)<sup>10</sup> and the Rye Action Plan (2009-2014).

### **Rother Five Point Plan**

2.19 The plan chimes with the five point plan of Rother DC<sup>11</sup> for investment in the local economy:

- a. Transport Improvements
- b. Urban Renaissance
- c. Excellence in Education
- d. Business Development
- e. Broadband Connectivity

### **Strengths, Weakness, Opportunities and Threats (SWOT)**

2.20 The Plan both draws on all this earlier work (referenced in the evidence section) and also a SWOT updated from the work by those who drafted the Rye and Rye Harbour Plan (2011).

<b>Strengths</b>	<b>Weaknesses</b>
Active town council and strong community participation: strong civic tradition	Demographic imbalance within the community
High level of parish consensus on key issues and future direction.	Low % of professional occupations Low average household income

<sup>8</sup> <http://www.marksbarfield.com/#/projects/rye-quayside-study/>

<sup>9</sup> Rother DC Rock Channel Development Study - Rother DC July 2007

<sup>10</sup> Rye and Rye Harbour Study – Rother DC August 2011

<sup>11</sup> <http://www.rother.gov.uk/CHttpHandler.ashx?id=22528&p=0>

Cinque ports status: rural/maritime character feel	Relatively high unemployment
Heritage assets - Conservation Area, historic Parish Church and a wealth of listed buildings	Lack of affordable housing for local young people and older people
Quality landscape setting: proximity to Romney Marsh and the Downs	Lack of smaller and suitable housing for the elderly
Important archaeology	Increasing amount of the local housing stock are second homes.
Good access to adjacent internationally important nature conservation sites including Rye Harbour Nature Reserve	Flood risk: over 1000 dwellings at risk
Proximity to sea	Constrained access to local services by those with mobility difficulties
Comprehensive public footpath network	Disparate community facilities across the town
Established fishing industry	More than 20% households have no car
Numerous local hospitality accommodation of all types and standards	Increasing traffic congestion
Numerous independent shops	Road safety/Speeding/Pedestrian vulnerability on A259 and feeder roads.
Several quality eateries	Serious parking issues (poor management and enforcement) throughout Parish.
Established tourism economy	Public transport inability to connect to adjacent centres out of hours.
Active community transport service	Strategic gaps in the national cycleway network, particularly across town
Farmers market (Wednesday)	Prominent derelict sites around Rye
General market (Thursday)	
Active arts community	



<p>Adequate train links to Brighton-Ashford line</p> <p>Developing education quarter</p> <p>Good levels of access to services in the geographic majority of the Parish.</p> <p>Proximity to towns of Ashford and Hastings</p> <p>Low crime levels</p>	<p>Poor accessibility to Simmons Quay</p> <p>Very limited activities for older children</p> <p>Limited broadband services.</p> <p>Reducing Police resources in remote rural location</p>
<p><b>Opportunities:</b></p> <p>Exploit localism, including management of local facilities, provided by the Localism Act.</p> <p>Create more cultural amenities and facilities</p> <p>Higher quality dwellings</p> <p>Retain the strategic gap between Rye and Rye Harbour</p> <p>Improve transport choice such as rail and buses.</p> <p>Improve the choice of family orientated attractions</p> <p>Better use underused sites such as Gibbets Marsh</p> <p>Improve public accessibility to Simmons Quay</p> <p>Strengthen green tourism industry</p> <p>Strengthen public footpath work</p> <p>Fill in strategic gaps in the local cycle</p>	<p><b>Threats</b></p> <p>Depressed economic situation restricts employment opportunities</p> <p>Transport network overloaded.</p> <p>Demographic imbalance and income disparities continues to be exacerbated</p> <p>Rising cost of housing, particularly for young people</p> <p>Some speculative residential and commercial development on sub-optimal sites threatens historic character of the town</p> <p>Threats to the commercial viability of Port of Rye</p> <p>Loss of local independent shops</p> <p>Residential development falls short of meeting local needs</p> <p>Coalescence with adjoining settlements</p>

network	Creeping urbanisation and loss of town identity through opportunity development
Improve sites such as Rock Channel and the Winchelsea Rd	Proliferation of visual clutter
Influence future of prominent derelict sites	More frequent extreme weather aggravates flood risk
Development without extending boundaries of the Parish or impacting on local gaps	Lack of recognition of the important undesignated but high quality landscape
Make initiatives on energy and power	Development increases noise and light pollution
Build more affordable homes	Reduced subsidies forces reduction in bus services
Improve surface/storm water/CSO water infrastructure	
Improve cycleway infrastructure	
Achieve more planting	

## Evidence

2.21 We have supported the Plan with evidence gathered from a wide range of sources, including public consultations, conversations, social media and a parish-wide survey. Details of our consultations are on the website and in RNP Support 3 demonstrating that the Plan fully accords with the requirements of the Localism Act 2011<sup>12</sup>. In short, this is a community plan, built from the ground up. The consultations meet the requirements of Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.<sup>13</sup> Details of the consultation are found in RNP Support 3.

2.22 We have acknowledged the importance of the Rother DC Core Strategy and its supporting evidence<sup>14</sup>, including the Strategic Housing Land Availability Assessment (SHLAA) and the Development and Site Allocation (DASA)<sup>15</sup> The latter estimates

<sup>12</sup> Localism Act- <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

<sup>13</sup> The Neighbourhood Planning (General) Regulations 2012 ENGLAND

<sup>14</sup> <http://www.rother.gov.uk/Background-Evidence>

<sup>15</sup> <https://www.rother.gov.uk/dasa>

the potential for new dwellings by sites to be built in Rye. The estimate shows that there is a sufficient supply of deliverable housing land for the next 5 years and to contribute to the South East Plan for housing requirements for the next 15 years.

2.23 We have particularly noted that the 2013 Rother DC SHLAA<sup>16</sup> suggests that *“the yield from existing allocations may not fully materialise, because of the many constraints applicable within Rye Parish”*.

2.24 In developing the policies early work complied with NPPF 2012, but once NPPF 2018 was launched we have taken into account the new requirements. We have noted in particular that

“the purpose of the planning system is to contribute to the achievement of sustainable development”. To this end the Plan has undergone detailed and running Strategic Environmental Assessment (SEA) (RNP Support Paper 4). The Plan also considers the three overarching objectives: Economic, Social and Environment as set out in the NPPF.

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<sup>16</sup> <http://www.rother.gov.uk/SHLAA>

### Section 3 - The Character of Rye



Figure 5: Rye from the Southeast

3.1 Rye is a historic market town in the eastern half of the district near the Kent border. It lost its cattle market in 2000 after the foot and mouth pandemic. The town is the main service and employment centre in eastern Rother. Rye Harbour is a satellite village to Rye and is located to the south east of the town. The area surrounding Rye is heavily constrained physically but in recent years has seen growth to the west of the town.

3.2 Rye attracts a significant number – up 1 million - of visitors throughout the year, but in particular the summer months. The 1million figure is a "widely accepted figure", has appeared in various reports and is a combination of estimated daily figures supplemented by routine events such as market days, Georges Day, Remembrance, Kino and so on, boosted by multi day festivals and the bonfire. These are borne out by capacities: 400 beds, up to 20 coaches daily, 900 car spaces, hourly (double) trains and cycles. When computed, this averages out at between 2500- 3000 people per day year round = 1m. Rye contributes to the total figure of 6 million to Rother.

3.3 As a Cinque Port town, the town centre around and including the ancient Citadel, forms the historic core, designated as a Conservation Area in 1968. It was subsequently expanded to the East in 1974.<sup>17</sup> It was reviewed again in 2006. The town centre is of very high architectural value, with a predominantly medieval street layout and building stock, while equally important is the town's visual appearance in the landscape, with the Citadel on a sandstone outcrop rising like an island above the low lying surrounding salt marshes and tidal waters.

<sup>17</sup> <http://www.rother.gov.uk/article/1404/Conservation-Areas>

3.4 The nature, history and development of Rye is described in much detail in (Martin, 2009) and will not be repeated here.



Figures 6 – 8: Views in the Citadel

3.5 Rye sits at the confluence of three rivers: The Rother and the Tillingham and Brede. The first is tidal; the last two held back by sluices. In medieval times the Town was surrounded by the sea but the harbour silted up leaving Rye some 3 miles from Rye Bay. The Port of Rye and Rye Harbour Road Industrial Estate are also main centres of employment for the town and the surrounding settlements. However, the local economy suffers from high seasonal unemployment relating to the tourism sector and wages are relatively poor compared to County and regional levels.

3.6 The countryside surrounding Rye is subject to a number of environmental designations, signifying its landscape character and conservation importance. There are a number of Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Sites of Nature Conservation Importance. There is a proposal from Natural England to designate a Ramsar<sup>18</sup> site to the south east of Rye. In addition, much of the surrounding area to the north and west is classed as the High Weald Area of Outstanding Natural Beauty, and there are a number of Ancient Woodlands (Main Plan Maps 26 and 27).

3.7 Rye Parish contains important archaeological remains, including numerous scheduled monuments and is likely to contain a much larger number of sites of recorded archaeological remains (recorded on the Sussex Historic Environment Record (HER)<sup>19</sup> held by East Sussex County Council), some of which may also be of

<sup>18</sup> The Convention on Wetlands, called the Ramsar Convention, is an intergovernmental treaty that provides the framework for national action and international cooperation for the conservation and use of wetlands and their resources. It is named after a city in Iran.

<sup>19</sup> <https://www.eastsussex.gov.uk/environment/archaeology/her>



national importance. The government's definition of the historic environment (which may otherwise be thought of as cultural heritage) within the glossary to the NPPF, is very broad, including planted and managed flora as well as all evidence of the past interaction of people and place including surviving physical remains of past human activity, whether visible, buried or submerged. In addition, the lists of 'designated heritage assets' (listed buildings, conservation areas, scheduled monuments, registered parks and gardens, battlefields and protected wrecks)<sup>20</sup> are all considered incomplete and should not be relied on as a comprehensive guide to the area's valued heritage. As such there is potential for further heritage assets of national importance to be present within the plan area, as well as other remains of more local importance that, nevertheless, merit consideration in planning decisions. The National Planning Policy Framework and the Planning Practice Guidance require that decision-making aims to sustain the significance of all heritage assets, including non-designated assets, such as the archaeological sites and historic buildings recorded on the County HER<sup>21</sup>.

3.8 The countryside around Rye is subject to a number of environmental designations, signifying its landscape character and importance. There are Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Sites of Nature Conservation Importance.



Figure 9: Rye from the South

3.9 To the south is Rye Harbour Nature Reserve. To the north and west is the High Weald Area of Outstanding Natural Beauty (HW - AONB) with several Ancient Woodlands. Maps 26 and 27 are included in the main Plan.

<sup>20</sup> **Rye Rebuilt** (2009) by David & Barbara Martin with Jane Clubb & Gillian Draper and the **Rye Historic Character Assessment** (2009) by Roland Harris.  
[https://www.westsussex.gov.uk/media/1744/rye\\_eus\\_report\\_maps.pdf](https://www.westsussex.gov.uk/media/1744/rye_eus_report_maps.pdf)

<sup>21</sup> <https://www.eastsussex.gov.uk/environment/archaeology/her>



3.10 The town boasts a high cultural offer, including a number of annual festivals, such as the high-profile Rye Arts Festival and the Rye Bay Scallop Festival, a strong arts and literary community, with several art galleries, and the long tradition of the Rye potteries.

## **The Community**

3.11 The population of Rye Parish was recorded as 4,469 in 2014, in some 2050 dwellings, but growth since has been in the order of around 100 dwellings. As a market town it serves outlying villages lifting the dependent population to an estimated 20,000.

3.12 The context of the human factors of the Plan is that there are four distinct groups: residents in the Town Centre (and Citadel), residents in the remainder of the Parish, traders and business people, and visitors. Each group has differing requirements and expectations, but most share the common view that the character of Rye should be conserved to protect their particular interests.

3.13 In 2010 over 13% of the Rye population was aged between 65-74 and almost 9% are aged between 75-84; nationally, the figure for the population aged between 65-74 is 8.7%. There is a wide mix of citizens, many drawn to the Town because of its unique character and location close to the coast within 50 miles of the M25.

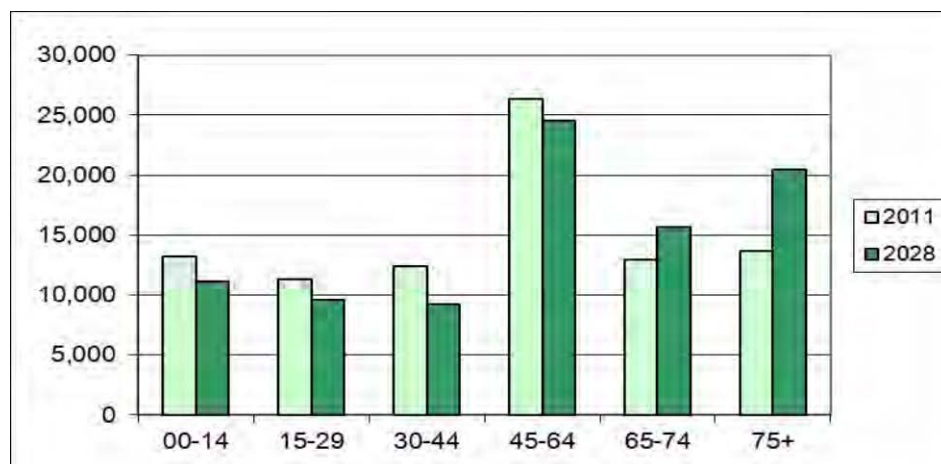
3.14 In Rye, there are pockets of social and economic deprivation within the town with high levels of child poverty, relatively low levels of income, high unemployment rates and significant barriers to housing and services.

3.15 Rother DC's population projections are based on housing growth and economic growth forecasts, suggesting that locally there will be some major changes in terms of its population structure between 2011-2028. Compared to the district as a whole, there is a higher proportion (15.6%) of children up to 15, and adults aged 30-44 (15.3%), but less adults aged 45-64 (27.5%) and aged 65+ (27.7%) in Rye in 2014-16.

3.16 Over the planning period, Rother DC forecasts an increase of people over 75 (by 38%) and an increase in those aged 65-74 (by 20%). Sussex records the highest proportion of dementia cases for any county in England. In 2015, Rye is seeking to become a "dementia friendly" community. The forecast shows that the 30-44 age group will increase but 16-29 year olds will remain static. The numbers of children up to 15 are expected to increase 8%.

3.17 The Rother DC average household size is one of the lowest in the region. At 2.15 persons in 2014, is set to reduce further to 2.13 by 2020 and to 2.10 by 2025. Around half the dwellings in Rye are single owner occupier.

3.18 These trends may be influenced in the future by factors such as the scale, location and form of development and changes in relative economic circumstances and strategic transport links, making it easier for residents to commute to work



Rother DC population estimates by age structure (2011-2028)

Figure 10: Rother Population Numbers

## The Economy

3.19 A wide variety of available facilities provides a wide range of services for both the Town and the surrounding area. Each year there are up to 1m all round year visitors. The 1m figure (visitors to Rye) is a "widely accepted figure", has appeared in various reports and is a combination of estimated daily figures supplemented by routine events such as market days, Georges Day, Remembrance, kino and so on, boosted by multi day festivals and the bonfire. These are borne out by capacities: 400 beds, up to 20 coaches daily, 900 car spaces, hourly (double) trains and cycles. When computed this averages out at between 2500- 3000 people per day year round = 1m. Given 6m visitors to Rother, 1m to Rye is about right.

3.20 Rye offers a varied range of shops, restaurants and services that provide "reasons to visit" and make it a "destination location". Tourism is therefore important. Rye enjoys an abundance of high quality hotels and guest houses located within the town itself. Approximately 70% of the Guest Houses and Bed and Breakfasts located in Rye have been awarded a 4 star or higher rating, with 25% of these providers achieving the highest possible rating of 5 star GOLD. The main attraction is the historic core of the town and the surrounding countryside.

3.21 However, the Rye economy is weak relative to the Southeast region as a whole, with average local incomes correspondingly low. The Rother District has low economic productivity (Gross Value Added) of local businesses being only 63% of the Southeast regional average<sup>22</sup>.

<sup>22</sup> East Sussex in Figures 2012

## **Management and Maintenance of Public Spaces**

3.22 Throughout the consultations on the Plan, many have raised the need for effective maintenance of public land and sites around the Parish. The Plan has considered the land held in public ownership by the Rye Partnership and the Environment Agency. Both these organisations have short and medium term policies that impact on the Plan. The latter chooses not to dispose of land because revenue go to Central Government. It ends to seek short to medium term leases, which can deter long term business investment.

3.23 Three Amenities Community Interest Companies (CICs) have been established in Rye to manage assets within the Parish: one leases property to the Kino; one manages the allotments; one manages the on line “Rye News”. The Plan considers that there is scope for more CICs to take on the management of those local public resources enjoyed by the community.

3.24 With reducing budgets for public services maintenance of communal areas has suffered since the banking crash of 2008. The poor state of Rye is the subject of much public debate in recent years. As a result, Rye TC now employs a steward within the Parish to maintain public areas. He coordinates with Rother DC, ESCC officers and private utilities and agencies, all of whom have their own specific responsibilities.

## Section 4 – Planning Policies

### Themes and Issues

4.1 The issues<sup>23</sup> raised by the Community have suggested that the Plan considers development in seven themes. These provide the start point for the Plan. The issues have arisen from public events, consultations, conversations (including social media) and two surveys. All these events have been recorded in the Consultation Document (RNP Support 3) and the evidence/data is available for scrutiny.

4.2 The Plan will run through to 2028. However, as we have seen significant uncertainty during the plan making, future challenges and pressures may force more change. Rye TC will become responsible for maintaining the Plan as a living document and should report annually (in April) against the Plan. Rye TC will work closely with Rother DC and other delivery bodies, such as Housing Associations, to monitor housing and commercial development on an annual basis.

4.3 The Strategic Environment Assessment (SEA) process has been an integral part of the plan preparation process. The SEA aims to bring greater transparency to the plan preparation process. The SEA of the Plan, while identifying some negative environmental impacts, has the effect of generally improving environmental conditions throughout the Parish, particularly in those areas which will experience development or renewal. This will address some of the environmental objectives which can be monitored over time. Wherever possible, mitigation measures will be introduced into development schemes which have the potential to impact negatively on the environment to minimise any adverse impact, the aim being to reduce Rye's ecological footprint.

### The Policies

4.4 Although the policies are arranged in separate themes, we require any new development to meet the relevant policies across all the themes. For example, new housing will be expected to meet not only the housing policies but those on design, reducing flood risk, green and open spaces, traffic management and accessibility.

4.5 During the considerable community engagement, we have identified many issues which demand policies that are not directly spatial. Where considered appropriate, these appear in Section 5 as “community aspirations”. Each policy theme will be dealt with in turn.

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<sup>23</sup> <http://www.ryeneighbourhoodplan.org.uk/vision-and-objectives/>

## Theme 1: Housing

41.1 Rye (as at June 2016) has a population of around 4255 living in 2,485 households. Analysis of the housing stock, demographic data and local housing market has revealed:

Totals in Rye Parish	Breakdown by Age <sup>24</sup>				
Citizens	0-14	15-29	30-44	45-64	65+
4255	14%	15%	16%	28%	26%

Present Dwellings – Composition				
Total households	One person households	Family households	Other categories	Remarks
2485	40%	54%	6%	1500 private homes (Includes 175 2 <sup>nd</sup> homes) 350 private rented  400 social

41.2 The Housing Need was established by considering a variety of factors below:

41.3 Supply Costs (May 2016) Location is everything, but open market categories range from £175k (2 bed terraced in Zone B) to multi millions (house in Citadel). Mid ranges are around:

- a. 1 bed = scarce supply
- b. 2 bed = £175k upwards (Undercliff dwellings are £175; Valley Park (VP) P5 starts £265K)
- c. 3 bed = £250k upwards (VP P5 starts £365K)
- d. Bungalows are in high demand and in short supply (can achieve around £400k)
- e. 4 bed = £450k upwards (VP P5 £525K; Dead Mans Lane £595K)
- f. Garage = £15k upwards

41.4 Rents range from around £800 (small one bed) to 3000 per month (house in Citadel). Holiday/short lets can be mean weekly rent equivalent to normal monthly.

<sup>24</sup> East Sussex in Figures 2011

#### 41.5 The elderly.

- a. Badger Gate: Amicus. Udimore Road, Rye, East Sussex TN31 7DT. 29 flats: 1 bed and 2 bed. Built in 1966 and renovated in 1990. Rents from £98.57 exclusive per week (2013 prices).
- b. Magdala House: Amicus. Ferry Road, Rye, East Sussex TN31 7DN. 15 flats: 1 bed. Built in 1988. Rents from £103.81 excl per week (2013 prices).
- c. Devonport House: Sussex Housing and Care. Tower Street, Rye, East Sussex TN31 7AT. 18 flats: studio and 1 bed. Built in 1982. Includes mobility standard properties. Rents from £459.46 inclusive per month (2013 prices)
- d. Strand Court: Burkinshaw Block Management. 49 flats: 1 bed and 2 bed. Built in 1988. Open Market around £150K. Includes wheelchair standard properties. Manager on call.
- e. In the adjacent Parish of Rye Foreign: Sanctuary St Bartholomew's Court development provides 55 refurbished/built extra care one bed flats. "Designed to offer comfort, independence and peace of mind, St Bartholomew's Court offers 55 one bedroom apartments for the over 60s." Extra Care scheme with on-site care staff, non-resident management staff and community alarm service; lounge, guest facilities, garden, hairdressing salon, assisted bathing facility; social activities. New residents accepted from 60 years of age. Rent (social landlord) and Shared Ownership

#### 41.6 Trends in May 2016.

- a. Many elderly seek 2/3 bed accessible properties to enable downsizing; premium inner town location and price in high demand (the Cinque Ports development is occupied by residents from 62 to 82!)
- b. Dwellings with parking are in high demand
- c. Developers continue to seek sites for mixed development but viability (meaning need to achieve significant returns) is an issue.
- d. Buy to (holiday or long) let accounts for as much as 75% purchases (may be to beat new legislation increasing costs). Rother DC advises that as at May 2016 the number of 2<sup>nd</sup> homes is 175.
- e. The local market accounts for around 25% sales
- f. "incomers" continue to seek properties for retirement or buy to let in the run up to retirement or in some cases rusticators from London (fast rail would be expected to increase the last category); there are few working "professionals" incoming.
- g. Around 10% of all enquiries result in contract
- h. Rye presents little for first time buyers: low local salaries; high costs, therefore most go to Ashford or Hastings.
- i. Rye's housing stock is fairly typical for East Hampshire and is made up of:
- j. 13% 1 bed, 25% 2 bed, 36% 3 bed, 19% 4 bed and 7% 5 bed or more #



- k. An annual salary of more than £50,000 is needed to buy a starter home in Rye
- l. Unsurprisingly, young people and first-time buyers therefore find it difficult to afford homes in Rye.
- m. Rye has significantly fewer inhabitants between the ages of 18 and 35 than the average for the South East
- n. The demand for new affordable homes in Rye is around 20 per year. The majority of this demand is for two bedroom dwellings. We are currently unable to meet this demand
- o. There is a shortage of reasonably priced (estimated to be around £200,000 homes for local people
- p. The percentage of the town's inhabitants that are over 60 will increase from 28% to 38% over the next 15 years. That is an increase of around 500 people
- q. There is a lack of good quality 2 to 3 bedroom housing within walking distance of the centre of the town for retirees who wish to downsize

## Second Homes

41.7 At the Rye Planning and Townscape meeting on Mon 4 Sep 2017, the Committee asked the RNPSG to re-examine again the policy in the latest draft RNP on second homes/buy to let. The context is the current proposal for 72 homes on the lower school site (RNP allocates this to housing but recommends no more than 50) and apparently rising numbers of second home buyers, often from London, encouraged by local estate agents.(Example is below).

*Rye Buyers Profile (Quote from Phillips and Stubbs Rye Website) The holiday home market is strong in Rye and the surrounding villages, with approximately 20% of sales being for second homes or holiday lets. Other major buyers are retired couples, usually from London, who by downsizing are also able to release money to augment their pensions. Some of course are people who left Rye when they were young to further their careers, and want to come back to their roots. While others are those who came to the area for childhood holidays and have continued to visit ever since. A new and growing group are people who, since the advent of faxes, email and broadband, are able to work from home and want to move their families out of the city to what they rightly see as a better environment .*

41.8 Some Councillors felt that we should do more in the RNP by way of policy to restrict new build open market sales as they have done in places such as St Ives. This paper draws on earlier work and refers to current draft policy set out in the V8 draft RNP (Para 10).

41.9 Leaving aside the challenge of defining a second home (does this include purchases into which buyers - mostly from London - intend to retire within 5 years?) In Rye it is calculated that there are some 200 second homes/buy to let homes; this of a total stock of around 2500. This represents some 8%. In St Ives the figures are acute (25% non residents). However, with the possibility of the Fast Rail Marsh link it

is not to say that the numbers here will grow. What merit in taking ‘a stitch in time .....’ approach? But can it be justified on forecasts? Over the last two years the trend for second homes/buy to let has increased, but changes to the tax laws have damped down this market. Rother has been invited to validate the figures.

41.10 With the uncertainty of BREXIT and the global financial situation it is difficult to predict how the numbers will change in 10 or 20 years.

41.11 Although many in Rye may see more stringent policy on second homes as desirable, solid evidence is required to justify it and there are clearly impacts in terms of definition, monitoring and enforcement. Who would do this? ... at what cost?

41.12 Advice has been sought again from Rother DC officers and our consultant. The former are still considering their earlier advice not to adopt such stringent policies but the latter says:

*" should avoid getting embroiled in such a complex issue. St Ives did succeed in retaining such a policy but only after lengthy legal wrangles, and I suspect it will be very difficult to enforce. Also I would suggest that St Ives' issue with second homes is much more severe than that experienced in Rye".*

41.13 As Rye Town Council owns the RNP, it can choose to modify or strengthen the existing policy H2 (perhaps along the lines of that of St Ives) if it feels that there is sufficient community support. However, as suggested below, such policy is not without challenges such as definition, enforcement and potentially costs.

41.14 Having consulted again, the RNPSG felt that the evidence does not support the sort of policy adopted by St Ives<sup>25</sup>, because the numbers are not so acute. In addition, there are the significant challenges of definition, monitoring and enforcement: work which would probably fall to Rye TC. Some consider that there is adequate provision in the existing RNP policy to cover affordable housing. Therefore having considered two options – leave as is and strengthen policies in line with those in Cornwall, the Council decided to leave the policy as drafted.

### **Community Feedback about Housing**

41.15 Our consultation with the community has indicated that there was a strong feeling about housing. People felt that the plan should have things to say not only about where new housing is situated, but also about the type of housing. The plan should be clear about the levels of quality and design that we would

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<sup>25</sup> <http://www.ryeneighbourhoodplan.org.uk/wp-content/uploads/2017/10/Affordable-Housing-RNP-Amended-18-Sep-2017-1.pdf>

like to see. Whilst many people were cautious about new development, the majority of people that we consulted recognised that there was a need for new housing, particularly for local people who are young or old. This would be a key factor in order to secure the town's future prosperity. The key themes that emerged were:

- a. More affordable housing for local people
- b. More housing for the elderly, to enable “downsizing”
- c. More housing suitable as starter homes.
- d. Consider impact of second homes and holiday lets
- e. Provide adequate parking, storage and garden space.
- f. Disperse new housing across Rye
- g. Building density is an issue with all new housing development. (Policy OSS4 Rother District Core Strategy<sup>26</sup> suggests that “development should be appropriate for its context”.)

### Developers' Contributions

4.16 It is intended that contributions (S106 and CIL [after 2015])<sup>27</sup> by developers should be used to improve local infrastructure in priorities agreed and recorded in the 123 List<sup>28</sup> and Infrastructure Development Plan, agreed between Rye Town Council and Rother DC. Examples of the sort of infrastructure, funded by developers' contributions and related to major development projects (recent past and future) across Rye, are below:

- a. Valley Park: SUDS installation, roads, recreational equipment, cycle and footpaths and planting.
- b. Former Tilling Green School Site: Roads and green space and planting, affordable housing, community centre and flood mitigation.
- c. Former Lower School Site: Roads, planting, rail crossing and Station Approach improvements.
- d. Former Freda Gardham School Site: Affordable housing, roads and pathways, planting and flood defence improvements.

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<sup>26</sup> <http://www.rother.gov.uk/corestrategy>

<sup>27</sup> <http://www.rother.gov.uk/CIL>

<sup>28</sup> <http://www.rother.gov.uk/CIL>

- e. Rock Channel and Strand: Roads and pathways, riverside walks, planting and affordable housing.
- f. Rye Harbour “Saltings”: Roads and nature reserve compensation.

### Reasons for the policies

41.17 The policies align with the aims of the NPPF and Rother District Core Strategy and seek to secure housing development to meet local needs, while ensuring that sufficient land comes forward to meet those needs over the Plan period.

41.18 The Steering Group considered that this Rother DC policy<sup>29</sup> to be particularly relevant:

*“To provide for a mix of good quality, sustainable housing development of the right size, type, tenure and affordability to meet the housing needs and aspirations of all sections of the community, including provision for specialist needs and the elderly.”*

41.19 The detailed site assessment considered three main options: do nothing; identify one development site; identify several sites across Rye. This work indicated that mixed or residential developments with over 10 dwellings in Rye should be focused during the planning period on the dispersed sites of: Valley Park, the former Tilling Green School, Winchelsea Rd broad location, the Rock Channel broad location and the former Freda Gardham School.

41.20 To meet the housing target set by Rother District Council, we have considered all potential development sites in a site assessment study. Applying the reverse arguments used when the Inspector and Rother DC decided to develop Valley Park (161 homes) we have concluded that there is no single site option within the Parish to meet the housing target and that as a result, we have selected the dispersed option for new development sites. All potential development sites have been assessed against a wide ranging and detailed list of criteria, selected through consultation with stakeholders and service providers to ensure that all relevant issues are addressed. Rother DC has approved both this approach and the selection of the most appropriate and sustainable sites.

41.21 To help eliminate unsuitable sites, criteria and constraints were used, including:

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<sup>29</sup> <http://www.rother.gov.uk/corestrategy>

- a. Overall compliance with the Rother DC Core Strategy
- b. Flood risk - sequential tests were carried out on all sites. Development within flood risk zones 3a and 3b (based on Environment Agency maps) were only selected after much consideration of the Environment Agency factors.
- c. Impact on national and international nature conservation designations - sites within areas protected for their international or national wildlife significance were rejected. Those which were adjacent to protected wildlife sites were only considered after consultation.
- d. Deliverability – only sites where development was considered deliverable were included. This included considerations of availability, achievability and viability within the plan period.
- e. Other issues considered included:
  - 1) any known contamination of land;
  - 2) transport and highways access;
  - 3) proximity to Town Centre, shops, schools and public transport;
  - 4) impact on the landscape and the wider environment ;
  - 5) availability of utilities such as water supply and drainage.

41.22 Other sites may be put forward during the plan period but any development of them will be in the strict context of the plan. An example of such a case might be the former Tilling Green School site for which a development proposal has been withdrawn, leaving an uncertainty about its future potential.



Figure 11: Rye from the Southeast

41.23 Key findings from the residents' survey showed the community has aspirations towards home ownership at an affordable level which suits the needs of an ageing population; young first time buyers; and the growth of young families. However, there was an overwhelming desire to maintain the scale, style and setting of Rye and to protect existing green spaces and immediately surrounding countryside from development.

41.24 In recent years, windfall sites have provided a steady supply of housing at a rate of between 5 to 10 dwellings per year. This trend is likely to continue but the Plan allows for the numbers to be kept under review to ensure that sufficient development is coming forward to meet local needs.

41.25 This Plan encourages the development of self-build properties for local need on suitable plots both within and adjacent to the development boundary and the Plan supports this approach.

41.26 There have been lessons identified from recent local developments concerning developers' contributions, design, dwelling mix, access, connectivity, density, planting and screening, maintenance of public areas. All of which provide learning for the handling of future proposals.

41.27 Given quality development and effective land use, the result will be a town which still feels compact whilst being closely connected to the surrounding landscape through footpath and cycle links as well as its many green spaces.

41.28 Throughout the plan making there has been uncertainty caused by availability of sites and market forces. For instance, in the early stages Tesco and Sainsbury competed for the Lower School Site (H8 in Figure 9). Subsequently the Plan allocated this site for a second supermarket. However in 2016 because of a shift in global policy both companies abandoned their plan and the site was sold on to a housing developer. Since then the Developer, ICENI, appears to have "land banked" as no firm proposal has come forward. Not only has the Plan had to be adjusted to match the change, but deliverability is a major issue.

41.29 In Rye, development land is in short supply and expensive. We must ensure that the additional development costs that might result from our policies do not make development in Rye non-viable. We have drawn on the work on viability by Rother DC in its consideration of the Community Infrastructure Levy (CIL).

41.30 Early work on the RNP considered the role of the town in the district and the scope for development on the sites identified in the 2013 SHLAA. Other sites have



also been considered in the site assessment (RNP Support 2). Because of its topography, landscape context and statutory designations, options for development within Rye Parish are severely limited, but, despite this, the Plan does meet its requirements for housing development.

41.31 Throughout the RNP process there have been numerous conversations with land-owners, architects and potential developers to assess achievability and viability of development on all the sites considered.

41.32 Rye attracts many “incomers” who would like to live in the town, some because of family connections, some because it is an attractive place to live and is within easy travel distance to London. This has resulted in a buoyant property market, in which many local people, because of their low earnings cannot afford to buy into or even rent. Market rents are relatively high.<sup>30</sup> There is therefore high demand for “affordable housing”<sup>31</sup>, resulting in demand outstripping supply.<sup>32</sup>

41.33 The policies adopted have sought to increase the amount of affordable housing while ensuring that housing stock and population mix remain balanced and new development is financially viable. Rother DC sets a policy for 30% for affordable homes<sup>33</sup> on allocated housing sites of 10 dwellings or more, to which this Plan conforms.

41.34 The RNP Steering Group has carried out a housing needs analysis which supports a June 2017 Rother DC study (Appendix 1). New housing development proposals, especially for affordable housing, should be provided to meet recognised housing need in the parish.

41.35 The provision of smaller homes, especially for young families, young people and for older people who wish to downsize is widely supported across Rye.

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<sup>30</sup> Rother Local Strategic Partnership – Annual Meeting 15 June 2017

<sup>31</sup> Affordable homes here means ‘social housing’ – homes which are made available to local people who have an identified need for housing but who cannot afford to buy or rent a home at market rates. Local Authorities allocate social housing to local people who have a proven housing need and are on the Council Waiting List. These mainly comprise homes to rent, but there are other options such as shared ownership and other tenures.

<sup>32</sup> Rother District Council Resident Survey by Opinion Research Services June 2017

<sup>33</sup> <http://www.rother.gov.uk/article/9895/affordable-housing>



Figure 12: Modern development within the Town Walls

### Windfall or Opportunity Sites across Rye

41.36 The Plan considers the need for small residential developments on infill and redevelopment sites within the parish, subject to the proposals being well designed and meeting relevant requirements set out in other policies in this Plan.

These will be known as ‘windfall sites’. Development must achieve best use of land in a manner that does not adversely impact on other policies within the Plan, particularly those that relate to environmental and design quality. The density of development should create a character that is appropriate to the site’s context.

41.37 One of the particular issues raised by the community has been the overbearing nature of some recent infill developments, particularly in “green areas”. Some permitted developments have been high density, creating issues in terms of amenity for neighbouring properties. Adverse impacts are considered to include the following:

- a. Loss of amenity, overshadowing, overlooking
- b. Loss of sunlight/daylight
- c. Noise
- d. Loss of green links/trees/hedgerows/vegetation
- e. Visual intrusion
- f. Loss of space between buildings
- g. Difficult access for pedestrians and vehicles.
- h. Shortage of space for waste and recycling.

### Sustainability

41.38 The policies aim to contribute to sustainable development by:

- a. re-considering the 2007 sustainability appraisal by Rother DC of development proposals for the Rock Channel.
- b. providing a sufficient quantity of good quality housing, which meets the needs of all sections of society.
- c. protecting and maximising the benefits of Rye's cultural and landscape heritage.
- d. ensuring the efficient use of land and material resources.
- e. focusing development on sites which are directly connected to the Town Centre for pedestrians and cyclists.

41.39 The Steering Group has carried a sustainability appraisal (RNP Support 4) to identify the impacts of the RNP.

## **Theme 2 - Design**

42. 1. The Town's long history has given it a legacy of buildings of all ages, with architectural and historic significance. It is widely acknowledged that Rye has a unique character and profile. It has attracted significant research and study, resulting in a body of work which records the history and staged development of Rye. In the last 5 years, two more books have been added including Martin, (2009) and Draper (2009). Martin's "Rye Rebuilt" provides an extensive and detailed explanation of how Rye developed for 500 years on its "Island-Like" site of around 36 acres, from its origins up until the late 17c. Draper (2009) suggests that there are broadly three periods of development:

- a. Medieval Rye: The rise and fall from early origins (12c) to the late middle ages.
- b. The Middle Period: The rise again to new heights in the 16c; the fall from late 16c as the port silted to recovery in the mid 18c.
- c. Modern Rye: development from the late 19c to date.



Figure 13: Distance: 20c development alongside the River Brede; Middle : 20 c commercial buildings replacing 19c boat building sites alongside the Rock Channel ; Near : Medieval Citadel

42.2 Throughout these three periods, development has followed the fortunes of commercial activity in Rye: as a port (fishing, ship repair and shipbuilding, storage, transport and warehousing), later as a trading centre servicing a wide area around; and latterly an agricultural cattle/sheep market, until animal disease forced the closure in 2000. The three periods enable the consideration of Rye in architectural and development terms (character) as in three zones shown in Figure 14:

- Inner (Citadel) medieval zone: Yellow
- Middle generally 19c: Blue
- Outer 20c: Green

42.3 The three character zones are considered further below.



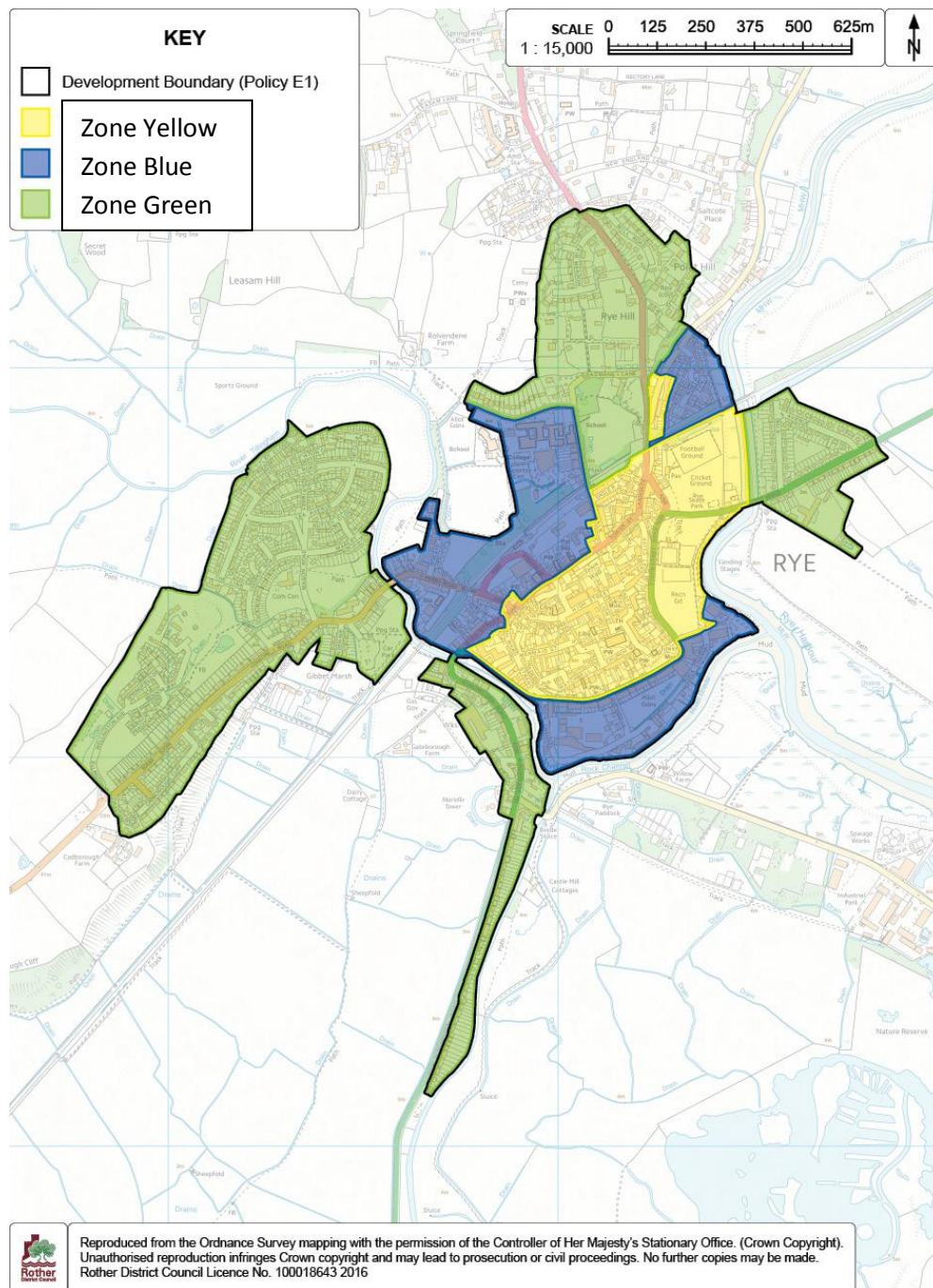


Figure 14: Character Zones

**42.4 Inner Zone: Yellow:** the ancient “island site” zone including the Rye Conservation Area. This is sub-divided into the area within the Town Walls, known as the Citadel and the lower parts outside the walls. A key consideration by many in the community is the need to conserve Rye's unique built environment around its Citadel with its striking heritage, profile, maritime character and working port. Therefore, all development must be considered in the context of the need to balance quality development with conservation. The Rye Conservation Area was first designated

in 1968 and over the years this area has expanded (1974). The appraisal considers Rye is of special interest, character and appearance. It identifies the wider qualities of distinctiveness of place by defining and protecting those physical elements that contribute to the special character. All development proposals in and around the densely built centre need very careful scrutiny. Infill and over-development can mean more noise, smell and increased traffic, leading to tensions between the various groups of occupants: residents, traders and visitors. Importantly, there should be proactive conservation of the heritage stock and infrastructure. The latter includes those special features such as cobbled areas and street furniture.



Figure 15 - 17: Features of Rye Citadel



Figure 18 -19: Typical Townscape of Rye Citadel



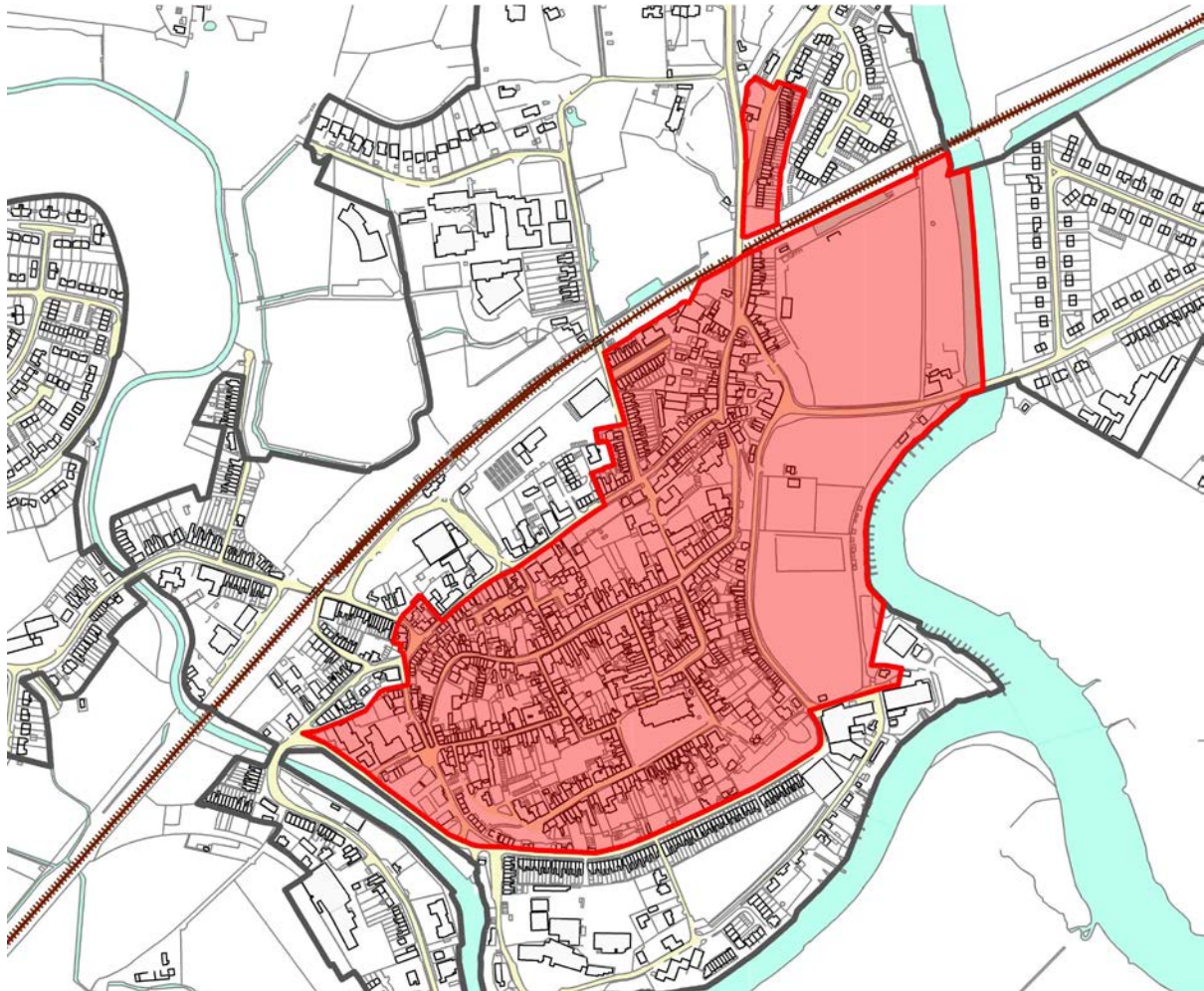


Figure 20: Rye Conservation Area (in Red)

42.5 Rother DC advise that: “Development in Conservation Areas is more strictly controlled than elsewhere, the intention being not to prevent change but to ensure that the main features of the area are conserved and that new development is sympathetic in character. Thus, only detailed plans and not outline applications will normally be considered for new development in Conservation Areas. The Local Planning Authority will require new development in Conservation Areas to have close regard to the scale, traditional building forms, materials and techniques characteristic of the areas. The height, size, design, roofscape, plot width and visual appearance of new development and the design of any new vehicular access, will be required to respect the character of the Conservation Area. The character is composed of many elements; the mixture of historical periods, the informality of the streetscape; the absence of formal rectilinear compositions; broken sight lines and profiles of buildings and interesting skylines. This not to say that contemporary design themes will not be allowed but a recognition that they present the designer with a considerable challenge if they are to be successful.” “Anyone wishing to totally

demolish a building or other structure (for example, a wall) within a Conservation Area, must first apply to the Local Planning Authority for Conservation Area consent. This is a separate procedure from applying for planning permission or listed building consent. There is a general presumption against the demolition of buildings or structures that are within the Conservation Area and contribute to its character and appearance.” “Trees form an important element of many Conservation Areas and anyone proposing to fell or carry out work on trees in a Conservation Area must give the Local Planning Authority six weeks notice of their intention. This enables the Local Planning Authority to make a Tree Preservation Order if the proposed work is considered not to be in the interest of the tree or of the amenity of the area in which it stands.”



Figure 21: The Strand Area from above

**42.6 Blue Zone:** at river level around the base of the Citadel. This area is predominantly Victorian with some individual buildings from earlier periods. It lies between the Conservation Area, and bounded by a line drawn to include the east end of Dead Man's Lane, Rother Railway Bridge, the Monkbretton Bridge. There are a series of principles, which were developed by Rother DC in 2007 for a development brief for the Rock Channel. These were never formally adopted. However, many of these are seen to have application and are copied below.

- a. **Principle 1 - Achieving High Quality Design:** The focus of many conversations has been building design, with many having an overwhelming desire by many in Rye to see a "quality and attractive design" on a "human scale" with a clear "sense of place" and connection to its surroundings. Related to this are key factors including:
- 1) all developments will be visually attractive, distinctive and to provide a sense of delight and enjoyment for all, as well as internally, to be functional for the occupants.
  - 2) there has been much debate about building height, with many preferring heights not more than "2.5" storey (top floor in the roof) buildings. Others see the possibility of higher buildings in certain sites. Therefore, on balance roof height will be "site-specific", but importantly with interesting and varied roof-scape to chime with the many roofs of Rye.
  - 3) Rye's heritage in terms of maritime, trade and agricultural connections will be reflected in new development through the use of building materials and vernacular architectural styles.
  - 4) new development will define its own 'sense of place' by drawing on Rye's maritime and rural character. Beyond the Citadel, local precedents found in key marker buildings provide important context.
  - 5) development will be of "human scale" and in harmony – coherence but not uniformity - with those other buildings nearby, to reflect the wide variation of development architecture over the 1000 years of Rye history. "Human scale", should be taken generally to indicate generally no more than 4 storeys, and up to this height only where sites and context allow.
  - 6) developers will consider contemporary interpretations of traditional materials such as dark-stained or white weatherboard, stone and brick plinths, areas of glazing and roofs of materials such as copper or with "green surfaces". Within the development types of stone will reflect Rye's rich heritage of characterful hard-landscaping materials.
  - 7) all opportunities will be taken to improve connectivity for pedestrians and cyclists between the core of the town and the Parish boundary. The numerous riverside walks (Brede, Tillingham and Rother) should be reinforced by earth or timber broad-walks where practicable.
  - 8) the positive characteristics of development sites will be protected, by not being intrusive, or significantly increase density.



- 9) stay in keeping with the existing style of local properties. Unsightly or highly contrasting extensions will be avoided and look out of place in the context. There will be matching features, such as the roof, with that of the existing structure. New developments will blend with but not necessarily imitate neighbouring properties.
- b. **Principle 2 - Planned, Selective Redevelopment:** The diversity of land ownerships of redevelopment locations and sites means that proposals are likely to come forward piecemeal. The job of the Rye Plan is to provide coherent guidelines to allow individual developments to stitch together. Where redevelopment is proposed, full account must be taken of its impact on its context (existing properties, residents and businesses); importantly the interests of the community will be at its heart. The Plan identifies specific sites and some 'opportunity areas' where development is to be focused. In each area the interests of the owner, developer and other residents have to be balanced with that of the community.
- c. **Principle 3 - A Vibrant Mix of Land Use.** New development should focus on the delivery of the following priority land uses: dispersed housing development on identified sites; small scale opportunity development in line with historical trends; small scale retail (use class A1) in mixed developments; (could include cafés/restaurants (A3) and or small scale workshops (B1)/Offices (A2).
- d. **Principle 4 – Making the best use of the Rural Margins and Riverfronts.** Rye has clear visual and physical links throughout to its rural marsh setting. Key to the success of any development, particularly in Zone B will be the reinforcement of these connections, so that they contribute to the vibrancy of the area, helping to create an environment for dwelling, leisure, recreation and commercial activity. Development should maximise opportunities for public pedestrian access to the riversides and to rural countryside for leisure pursuits. Selective development will overlook the rivers but not prevent public 'ownership' and activity along the river banks. There should be attractive and place-sensitive pathways through existing green spaces and along the rivers which will serve to encourage movement, improving connectivity throughout the Town.
- e. **Principle 5 – Ensuring and Improving Accessibility:** Pedestrian access, exploiting existing Public Rights of Way, should provide an attractive and coherent walkway linking the main areas of Rye. There should be access points to encourage pedestrians into the area, by the inclusion of clear pathways and safe road crossings. There should be cycle links connecting all locations and then to National Cycle Routes, to provide a flat alternative to the route through the Town. Where space allows, this should be a 2-3m wide shared cycle and footpath. All areas should be linked to each other and back into the centre of Rye, reinforcing Rye as 'a connected community' with pedestrian and cycle access to all.

- f. **Principle 6 - Managing Flood Risk.** Rye faces all known flood risks: pluvial (surface), fluvial (river), coastal (sea), combined sewerage and runoff (surface water) and high water table/springs. In extreme conditions, as in December 2013 when the water rose with tidal surge to 5.3m AOD, all can combine to cause extreme effects. The Eastern Rother Tidal Walls scheme (planned for 2019) will enhance the flood wall system on the eastern side of the Rother, resulting in a system with a 5.8m AOD height, protecting some 1400 dwellings from flood risk. The Environment Agency's advice for new development in the high risk areas is as follows: commercial uses can be at ground floor level, including the 'work' element of a live/work unit; for residential properties, the main habitable areas (kitchen, study, lounge, dining) should be at 6m AOD floor height, sleeping accommodation at 6.6m AOD. Garage/utility room at ground floor level. Buildings should be 'flood resilient'. There should be means of safe/dry access/egress where possible and appropriate. Occupants in the area should be registered with the Flood Warning Scheme. Development should not take place immediately behind the tidal defences to allow sufficient access to the defences for maintenance. Planning applications should be submitted with a full Flood Risk Assessment.
- g. **Principle 7 - Providing Affordable Housing.** In accordance with the Core Strategy, 30% of the new housing where there are units of 10 or more, should be affordable. Development sites should cater for the affordable housing requirement by providing the required number of units on site enclaved alongside open market housing. There should be no significant difference in design terms between the market and affordable units. The tenure of the affordable dwellings should be primarily social-rented although an element of shared-ownership may also be appropriate where these are provided at an entrance equity level that local people can afford on local incomes. The exact tenure balance and size of the affordable dwellings will be informed by the nature of local affordable housing need and relatively large number (400 of the 2500 units) of existing numbers in the overall Rye total.



Figure 22: New Development in the West of Rye

- h. **Principle 8 - Respecting and Recording Archaeology.** It is assessed by Heritage England that there are significant archaeological remains across the parish. With Rye's long history as a port, trading and agricultural centre with the shifting nature of past river channels, beaches and marshes, there is high potential of the survival of evidence of past human activity of industrial, ship-building, fishing, and as a rural centre. Development will take account of this potential through appropriate assessment, evaluation and mitigation in order that significant archaeological remains are protected in situ, enhanced and conserved or where this is not possible adequately recorded in advance of their loss. Provision will be made for all discoveries and findings to be reported to appropriate professional standards and the archive deposited with Rye Museum.
- i. **Principle 9 - Maintaining Quality into the Future:** Sustainability and environmentally friendly with an eye for controlling future maintenance requirements and costs involves the use of good quality materials, sound construction techniques, and planned appropriate management regimes. Where infrastructure is to be transferred to a public body after the development's completion, contributions will be sought through a CIL/Section 106 agreement to provide for future maintenance and management. This might include aspects such as improved surface water drainage measures, additional flood defences (to protect additional areas not covered by the Tidal Walls Scheme), public open space, landscaping, street furniture, lighting and the riverside walks.
- j. **Principle 10 – Flexibility and Innovation.** Although planning rules can be seen by some developers as rigid and inflexible, all proposals should have built in flexibility, creativity and innovation of the type described in "The Manual for Streets"<sup>34</sup>, RIBA's "Designing for Flood Risk"<sup>35</sup> and the Government's advice<sup>36</sup> on self build, whilst maintaining overall coherence and character. Technology should be exploited to make buildings efficient and "user friendly".



Figures 23 and 24: Typical houses of the Citadel

<sup>34</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/341513/pdfmanforstreets.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf)

<sup>35</sup> [https://www.architecture.com/Files/RIBAHoldings/PolicyAndInternationalRelations/Policy/Environment/2Designing\\_for\\_floodrisk.pdf](https://www.architecture.com/Files/RIBAHoldings/PolicyAndInternationalRelations/Policy/Environment/2Designing_for_floodrisk.pdf)

<sup>36</sup> <https://www.gov.uk/government/news/government-backs-self-builders>



**42.7 Green Zone.** Despite the additional costs of quality design, what is clear is that the plan should seek to raise the overall design quality of the area - buildings and public spaces - consistent with the context of a town with a nationally important conservation area. The Plan seeks to reflect the community desires for all proposals for new housing on the allocated sites to be of high standard of design, layout and construction to reflect Rye's character, identity and distinctive setting. Importantly, development must be sympathetic to its surroundings, with modern designs fitting alongside traditional types, incorporating heights and roof-scapes to fit the setting. Many agree that improvements should seek a more attractive and coherent link between the Strand Quay broad location and the Salts. Proposals for the allocated sites must demonstrate how their proposals meet the specific site design briefs as laid out in this plan. In particular, the housing layout shall include adequate parking areas, green space, landscaping and access for disabled people. All applications for new homes should include a Building for Life assessment and proposals will be expected to score positively (predominantly green) against the criteria. Only in exceptional circumstances, when all other options have been explored, will a red score be permitted. There is a call for future development to make more efficient and effective use of land through selective redevelopment, with improved public access into and through the area, and particularly to the river and waterside.

**42.8** The planning system should contribute to and enhance the natural and local environment by:

- a. protecting and enhancing valued landscapes, geological conservation interests and soils;
- b. recognising the wider benefits of ecosystem services;
- c. minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- d. preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- e. remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

## **Sustainability**

42.9 The policies aim to contribute to sustainable development by protecting and maximising the benefits of Rye's cultural and landscape heritage.

42.10 All new development must address sustainability issues as set out in the Rother DC Core Strategy.

42.11 Design must address all aspects of the adverse impacts of development including noise and light pollution.

### Theme 3: Reducing flood risk

43.1 At the confluence of three rivers and the coast, flood risks and with some 1400 dwellings categorised “at risk” in Flood Zones 2 and 3 by the Environment Agency, it is particularly important to mitigate the impacts.

43.2 After the highest storm tidal surge on 6 December 2013 (to 5.1m AOD) experts warn<sup>37</sup> that there will be more frequent extreme weather with heavy rainfall, high tides, perhaps with surges, high ground water combining to test the flood defences, flash localised flooding and ponding. This leads to an increased risk of localised and flash flooding.

43.3 The Government announcement in December 2014 that the flood mitigation schemes for area Folkestone to Cliff End<sup>38</sup> will be funded. This means that the final area to be improved around Rye - the Eastern Rother Tidal Walls project - is on course for completion in 2019. Once finished Rye will be protected to 5.8m AOD.



Figure 25: Ponding caused by localised surface water on the Strand, Rye

43.4 The National Planning Policy Framework (paragraph 100) requires Plans such as Neighbourhood Plans to “apply a sequential, risk-based approach to the location

<sup>37</sup> <http://www.thejournal.co.uk/news/north-east-news/weather-experts-newcastle-university-warn-7199371>

<sup>38</sup> <http://www.shepway.gov.uk/webapp/lydd-airport/CORE%20DOCS/CD12/CD12.10%20Folkestone%20to%20Cliff%20End%20Strategy.pdf>

of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by applying the **Sequential Test**, and, if necessary, applying the **Exception Test**"

The sequential test is separate and should be read with the RNP Support Paper 4. It draws upon information in the Rother District Strategic Flood Risk Assessment (SFRA) <sup>39</sup>. The tests follow the steps outlined in the National Planning Policy Framework and accompanying technical guidance, and follows examples of best practice as highlighted by the Environment Agency. As all the proposed sites in the RNP are in Flood Zone 3 the test considers wider sustainability benefit reasons for development. The Plan is supported by evidence in the Rother SFRA suggesting that any residual risks can be mitigated.

43.5 Along the South Coast, sewerage systems employ Combined Sewage Overflow (CSO) design which means that in extreme conditions there may be “hydraulic overload” and resultant discharge of untreated waste to water courses and the sea. The Plan supports any measures by the Water Authorities to replace such systems. In particular, the Plan encourages the privatised industry to:

- a. encourage partnership working to find solutions to “overload” situations.
- b. develop its systems to cope with the worst case scenarios.
- c. ensure that vital infrastructure is protected from flood risk with systems being upgraded as necessary.
- d. maintain all watercourses and sea/river defences to keep water out of dwellings and businesses.

43.6 The modern and more sustainable approach for drainage and surface water management is Sustainable Drainage System (SuDS). SuDS help to slow down the water flow rate to pre-existing levels, reduce pollutant loading and where possible reduce the volume of water flowing off paved surfaces by applying multiple stages where water is stored, treated and released back to local watercourses or groundwater at a controlled rate. We strongly encourage SuDS to be incorporated into all planning proposals, where appropriate, as per national guidance.

43.7 In some cases, new development can have a substantial cumulative impact on surface water flood risk locally. Residents should bear in mind that often the ‘green

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<sup>39</sup> <http://www.rother.gov.uk/article/4900/Strategic-Flood-Risk-Assessment>

areas' (e.g. gardens, lawns, verges, etc.) form part of the overall function of the whole site's drainage plan.

43.8 Where there is new development it is unavoidable, techniques such as permeable paving can be used, as opposed to bituminous construction to allow infiltration and reduce the amount of surface water runoff. The Environment Agency has produced guidance on the permeable surfacing of front gardens which can be found online.

43.9 From the earliest times, Rye found its water from the numerous springs to the north and west of the Town. In the main, these exist today releasing water from aquifers and into the drainage system. In some places, such as the Tilling Green, the Grove and the Military Road, in extreme conditions this water aggravates surface water and ponding. It can also be the cause of soil erosion and landslip in places such as the Military Road.

43.10 The Plan notes that some new designs are being proposed for building on flood plain, such as explained in RIBA guidance.<sup>40</sup>

43.11 The community has underscored that:

- a. new development in flood risk areas in Rye must be designed to mitigate risk<sup>41</sup>
- b. any development on any land unprotected by a flood defence scheme must be avoided.
- c. no development should disrupt the existing watercourses of the existing and complex drainage system.
- d. Southern Water must be encouraged to work with partners to ensure that the sewerage system can cope with any new development.

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[https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=0ahUKEwj8tIfE1LHLAhVCuBQKHQFeA7AQFggnMAE&url=https%3A%2F%2Fwww.architecture.com%2FFiles%2FRIBAHoldings%2FPolicyAndInternationalRelations%2FPolicy%2FEnvironment%2F2Designing\\_for\\_floodrisk.pdf&usg=AFQjCNGmj1JBAMqZkRuO9Im27JWEsOis4g&sig2=rKXk5o32EhE2idUpw3KStg&cad=rja](https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=0ahUKEwj8tIfE1LHLAhVCuBQKHQFeA7AQFggnMAE&url=https%3A%2F%2Fwww.architecture.com%2FFiles%2FRIBAHoldings%2FPolicyAndInternationalRelations%2FPolicy%2FEnvironment%2F2Designing_for_floodrisk.pdf&usg=AFQjCNGmj1JBAMqZkRuO9Im27JWEsOis4g&sig2=rKXk5o32EhE2idUpw3KStg&cad=rja)

<sup>41</sup> <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/neighbourhood-planning-flood-risk/what-should-be-considered-if-there-is-a-risk-of-flooding-in-the-neighbourhood-plan-area/>

## Reasons for the policies

43.12 The NPPF 2018 provides clear guidance for local planning authorities, including the need to adopt proactive strategies to mitigate and adapt to climate change. Developers should take full account of flood risk, water supply and demand considerations.

43.13 The Rother DC Core Strategy seeks to avoid flood risk and to minimise the impact where it does occur. These higher level strategies provide a clear context for the Plan's policies in relation to reducing flood risk.

43.14 The Rother DC Strategic Flood Risk Assessment (SFRA) <sup>42</sup> informs the application of the Sequential and Exception Test as set out in the Planning Practice Guidance (PPG)<sup>43</sup>.

43.15 Rye is one of the 6 flood risk "hotspots" in the East Sussex County Council Flood Management Plan<sup>44</sup>. ESCC has initiated a surface water flood risk assessment of Rye; the results of which will be reflected in this plan<sup>45</sup>.

43.16 Numerous springs exit the high ground to the north and west of Rye, aggravating the surface water risks.

43.17 Over the last 5 years, there have been several incidents of sewage spillage around Rye, caused by extreme rainfall entering the sewerage system and resulting in "hydraulic overload" of the system.

43.18 With localised flooding in 2000, 2007 and 2014, localised flooding risk has affected some residents. The Environment Agency records over 1400 homes within the Parish<sup>46</sup>, which are dependent on flood defences for protection. These are reliant on sea walls and water defences, such as drains, sewers with flap and pump controls between the protected side and the water risk.

43.19 Surface water percolating into the sandstone in places such as Military Road and parts of the Citadel, have caused landslip. In the past such slips have caused evacuations of dwellings below. Future development in this area should specifically

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<sup>42</sup> <http://www.rother.gov.uk/article/4900/Strategic-Flood-Risk-Assessment>

<sup>43</sup> <http://planningguidance.communities.gov.uk/>

<sup>44</sup> <https://new.eastsussex.gov.uk/environment/flooding/localfloodriskmanagementstrategy/>

<sup>45</sup> <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

<sup>46</sup> <http://www.ryenews.org.uk/opinions/rye-really-risk-flooding>



consider the risk assessments, categorising land beneath the cliff from low to very high risk.

43.20 Justifiably, there is wide community awareness of flood risks and concern that they are mitigated.

43.21 Measures to reduce flood risks can also benefit wildlife and the plan encourages opportunities to support wildlife conservation where possible.

#### **Theme 4: Enterprise and Employment**

44.1 Rother District has one of the weakest economies in the South East, with a low level of economic productivity (Gross Value Added only 68% of the regional average).<sup>47</sup>

44.2 The global trading situation (compounded by BREXIT) has an adverse impact, particularly as the area started from a relatively weak base. An issue raised by many is the need for effective business development for jobs, inward investment and enterprise.

44.3 The levels of earnings in Rye are below the national average, adversely impacting on prosperity and standard of living. The economy has limited capacity to support a wide range of job opportunities, especially for younger people.<sup>48</sup>

44.4 The reality is that those with skills and education must travel outside to find suitable employment. Therefore, connectivity to other centres in the region is an issue. Those with low skill levels find themselves competing in a crowded and uncertain commercial market.

44.5 Rother District has a higher proportion of people working at or from home than in any other district in the South East. In Rye the figure is estimated to be some 15%.

44.6 The economically active rate of the workforce within Rother District is low at 75.4% compared to 79.1% for the South East (Annual Population Survey/Labour Force Survey, 2010). The service industries make up a significant proportion of the employment within the district and account for 87.8% of jobs.

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<sup>47</sup> <http://www.rother.gov.uk/CHttpHandler.ashx?id=14875&p=0> Rye and Rye Harbour Study

<sup>48</sup> <http://www.theguardian.com/news/datablog/2011/nov/24/wages-britain-ashe-mapped>

44.7 With its attractive topography and distinctive heritage, Rye has a unique identity and widespread reputation with tourists. However, it must encourage business to mesh with its characteristics to maximise its role as a destination town.



Figure 26: Heritage Centre Rye

44.8 With the attraction of its historic core, surrounding countryside and access to the sea, a key feature of Rye's local economy is tourism. Although English seaside towns cannot compete internationally on climate, as an attractive destination it attracts "short stay" visitors from across the globe.

44.9 In March 2015, the South East Tourist Office was closed as a result of budget cuts. The important facility of information centre for visitors has passed to the Rye TC managed Heritage Centre.

44.10 The capacity of local hotels and guest houses is around 400 beds, with around 70% of the establishments having ratings of 4 star or higher. Around 25% of these providers achieve 5 stars. Although there is an all year round tourist economy, there is seasonal unemployment in the tourism sector. Rates of pay are low<sup>49</sup> compared to County and regional levels.

44.11 The Citadel provides the focus for retail and other services for the town an attraction for tourists and a place of residence for many. However, there is also a

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<sup>49</sup> Rother DC Core Strategy "Rother District- Although not a wealthy area relative to other more affluent parts of the South East"

need to increase the number of micro businesses, less dependent on footfall, in the surrounding areas of the Town centre, the working port and industrial areas of Rye Harbour.

44.12 The High Street needs specific attention with future development providing real “reasons to visit”. High rents and business rates remain an issue. In common with many town centres there have been business closures and relocations. The Plan looks to national studies<sup>50</sup> <sup>51</sup>to support its policies.

44.13 The Plan takes account of other studies and regeneration, particularly those being led by enterprise partnerships.

44.14 Now that the two big supermarkets (Sainsbury’s and Tesco) have decided to abandon their plans for the former Lower School site, the site is subject to planning for housing. However a total of four potential uses have been identified by the Steering Group and reflected in the Site Assessment Document: education, commercial, housing and other such as parking.

44.15 This change means that it is unclear whether a second supermarket will come to Rye, but alternative potential sites have been considered.

44.16 The Port of Rye and Rye Harbour Road Industrial Estate provide main centres of employment unrelated with tourism for the town and the surrounding settlements (up to 1000 jobs including the fishing fleet).<sup>52</sup>

44.17 With the Environment Agency holding significant plots of riverside and land alongside “gateways”, its policy of short term leasing, (for necessary income to the Port), rather than disposals deters long term substantial business investment. The result is short term use by car lots, car washes, parking and storage.

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<sup>50</sup> <http://thegreatbritishhighstreet.co.uk/pdf/GBHS-British-High-Streets-Crisis-to-Recovery.pdf>

<sup>51</sup> <https://www.ucl.ac.uk/transport-institute/pdfs/future-high-street>

<sup>52</sup> <http://rother.devplan.org.uk/document.aspx?document=19&display=chapter&id=167>



Figure 27: Historic ship Balmoral at Rye

44.18 Located along the western gateway to Rye, this tends to detract from the attractive character of Rye and is considered by many not good for the environment. Imaginative solutions must be found for future development of these locations.

44.19 In the surrounding area, there is a farming community served by the Town of Rye.

44.20 Fast, reliable broadband internet access is essential for homes and businesses to benefit from online services. Internet access speeds in Rye are slow.

44.21 Rye is marketed as a Historic Market Town with popular weekly Wednesday, Thursday and Friday markets. Overall, the community was very supportive of businesses in Rye. The community felt that a rich mix of small businesses, particularly from the creative industries, should be a key feature of the town.

44.22 Discussions with local small businesses suggest that there is a requirement for a small office/enterprise centre (Incubator/SME cluster site) close to the town centre. One site which provides this facility is the Rope Walk Centre.

44.23 The community feedback reveals that policies should:

- a. Encourage festivals and major Town events.
- b. Take every opportunity to create employment and training opportunities
- c. Encourage maritime related enterprise, including support for the fishing fleet
- d. Support the High Street: encourage “reasons to visit”.

- e. Need a second supermarket
- f. Need a second petrol station ( and food outlet)
- g. Need faster broadband

**Reasons for the policies.**

44.24 Residents and businesses alike in Rye are keen to promote economic prosperity and to encourage growth in local employment, particularly for young people.

44.25 Rye's town centre, with its wide range of independent shops, local market stallholders, bank, Post Office and petrol filling station is of vital importance to the community, serving the needs of local residents, visitors and a wide rural hinterland.

44.26 Tourism provides jobs and income for many in Rye. Many support the view that "green" tourism, including niche activities, could better exploit Rye's unique environment.

44.27 Development at Rye Harbour provides space and opportunities for economic growth in both well established and new businesses.

44.28 The Fairtrade concept should be promoted so that more and more people can learn about the system and work to make it even better.

44.29 The Rother DC Core Strategy requires the provision of about 20,000 sqm of new employment land in the Rye/Rye Harbour area. By its very nature, employment land, particularly light industrial, is often located around the edge of settlements.

44.30 The natural constraints in Rye and the ongoing development in Rye Harbour mean that that the latter is the preferred location for new commercial and light industrial development.



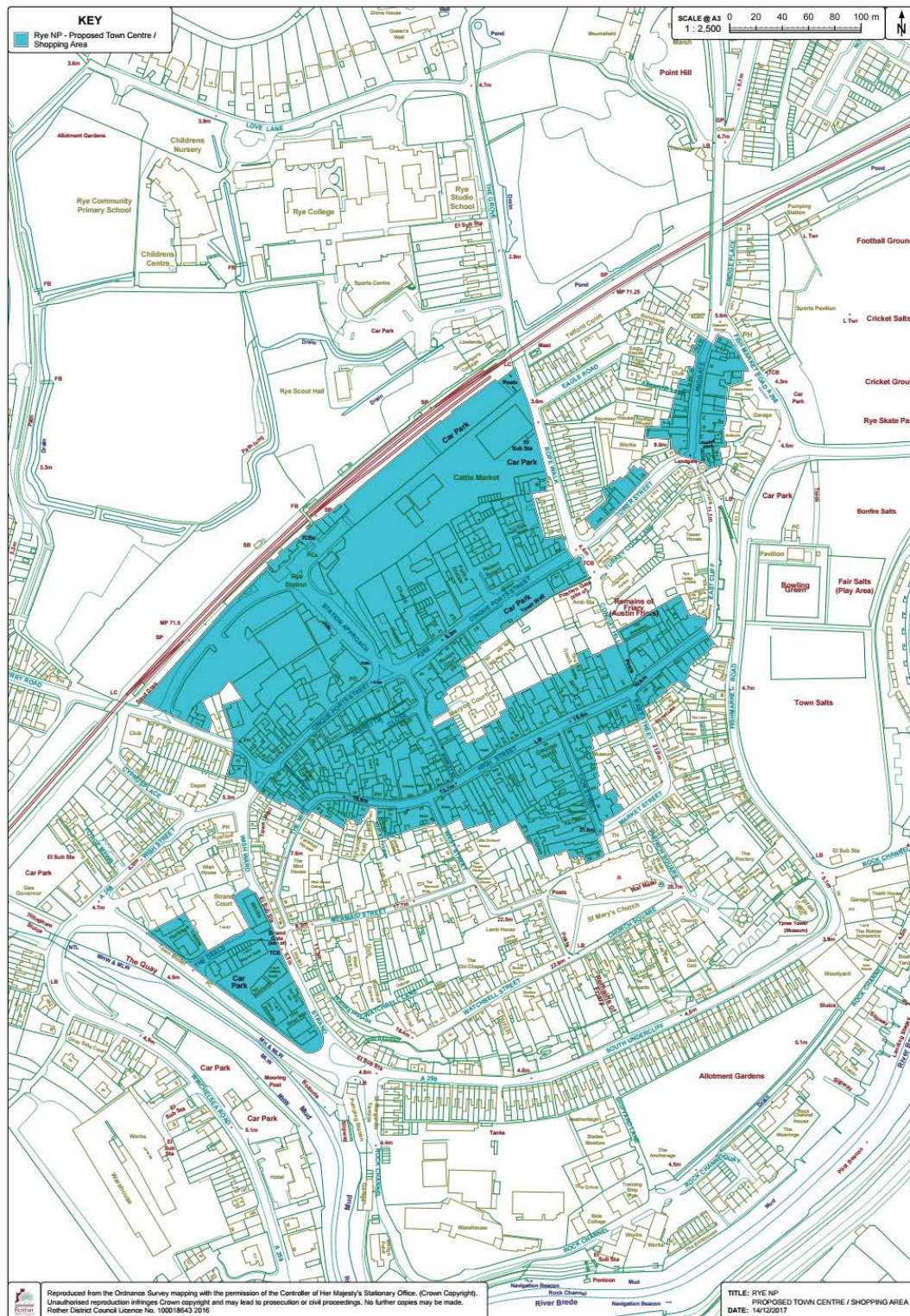


Figure 28: Core Town Centre business Area in blue





Figure 29: Rye Fishing Quay

### **A Second Supermarket?**

44.31 There has been considerable debate in the community about the need for a second supermarket and petrol station, to provide competition and choice. The latter should be close to the A259 trunk road as it carries the larger volume of traffic through Rye. The NPPF seeks to ensure the vitality of town centres at the heart of their communities. One of the criteria is to “provide customer choice and a diverse retail offer and which reflect the individuality of town centres”. Also there is a requirement to retain existing markets.

44.32 Both Sainsbury’s and Tesco aspired to develop a store but in 2015, following a global review of their business development plans, decided to withdraw their proposals. A sequential test was carried out to identify the preferable sites around the town centre. Those sites identified are described as “edge-of-centre” sites because suitable and viable town centre sites are not available, but importantly they are near to the centre of Rye population in the West of Rye.

44.33 The Rother Core Strategy required an additional 1650 sq m. Earlier versions of the Plan identified sites but following community objections and market forces the sites were rejected by the Steering Group. Following this a case was submitted to Rother DC on the basis of change of circumstance. Despite the requirement in the Core Strategy, in early 2018 Rother agreed to drop the requirement. Meanwhile BP proposed a petrol station and food outlet for an unallocated site in Rye and as a result the latest version of the Plan allocates a site alongside the A259.

44.34 The Lower School site previously had a planning permission for a supermarket (RR/2010/2570/P) but this expired because of lack of commercial interest reflecting changing retail trends away from large superstores to on-line shopping and smaller convenience stores. However, it remains the case that there is significant convenience trade “leakage” from Rye, such that a further store would

undoubtedly claw back trade, with associated benefits in terms of reliance on the car. Also, with further development in Rye and increasing fuel costs, it is considered that the opportunity for accommodating a further supermarket or convenience store and petrol station in the future should not be entirely lost. At present there has been no interest from any major operator since Sainsburys and Tesco jointly stated that neither was pursuing the one edge of centre opportunity at the former Lower School site. The lack of any positive response to more recent approaches on behalf of the RNP Group about retail interest and the overall cutting back of store development programmes, combine to indicate that there is no reasonable expectation that any new supermarket allocation would be taken up in the foreseeable future. This is considered to amount to a material change in circumstances since the Core Strategy was prepared and examined.

44.35 Work by the Steering Group to identify an alternative site (to the Lower School) for a supermarket close to the Centre has resulted in no community consensus. One site, Gibbet Marsh was regarded as meeting the criteria has been withdrawn because of community opposition. One of the arguments was that it provided valuable overflow car parking (up to 200 cars) within easy pedestrian distance to the Town Centre and Station. This location has been categorised as a green space and therefore to enable its continued use as a car park the development boundary is proposed to include this site.

44.36 Given the interest by BP to establish a petrol station and convenience store in Rye, it is considered appropriate to identify a site of up to 2000 sq m close to the centre and on the A259 trunk road to cater for any developer proposing a petrol station and convenience store of up to 500 sq m.

## **Sustainability**

44.37 The Plan seeks to support sustainable rural “green” tourism and leisure developments that benefit rural business, encourage visitors; retain local trade and respect the character of the countryside.

44.37 The policies aim to contribute to sustainable development by:

- a. encouraging a strong and sustainable economy
- b. encouraging inward investment, and supporting existing businesses to expand and diversify.
- c. reducing the need of people and businesses to travel, by selecting sites using sequential tests.

## Theme 5: Traffic, Access and Getting Around

45.1 Rye's unique geographic and physical situation creates a challenging framework around and within which transport has to work: the original hill top with its small grid system of streets still houses much of the key business and commercial operations of the town (currently including all the town's banks and building society, dentists, dispensing chemists, library and 3 churches), while the (trunk) A259 road coming in from the west skirts the base of the hill (with narrow carriageway for a trunk road) before going out across the marsh to the east. Developments, particularly in the last century have created residential, educational and industrial areas around and away from the base.

45.2 The A268 road takes much traffic north up Rye Hill through neighbouring villages to reach the A21 whilst the B2089 provides a link to the area to the west and the northern parts of Hastings and St Leonards. There are concerns over the speed of traffic coming into the town on these two major routes as well as on the A259, residents of New Road, New Winchelsea Road and Udimore Road in particular are looking for action to control the problem. There are issues for the safety of road users and traffic flow resulting from building developments within the town - that in Deadmans Lane continues to cause problems and the access for other sites in the town is a key concern and may impinge on their viability.

45.3 Reconciling all the different demands - the needs of residents and of commercial and business operations, the protection of structures that are in places fragile and historic, the demands of tourism and leisure activities, etc - is very difficult. This is especially so for a town that is not an easy place for people to get around under their own steam (even more so in inclement weather). The Plan seeks to promote traffic management, supporting vulnerable road users - pedestrians, children, those with mobility difficulties - while recognising residents' and visitors' needs and those of business and commercial operations for vehicle usage.

45.4 Changes in traffic volumes underline fundamental shifts in living and working patterns. Comparing traffic volumes in 2014 to those of 2004 reveals that whilst overall volumes were almost unchanged (-5%), the breakdown shows significant changes: HGV volumes were down by 30% but those of light goods vehicles increased by 30%, car volumes were down 10%. This reflects the losses of larger industrial operations in the area and the subsequent (and continuing) development of smaller scale commercial/industrial businesses, and, crucially, the huge rise of internet purchasing, by businesses and individuals.

45.5 The 2016 road traffic situation in the town is directly affected by two factors:

- a. the several hundred deliveries made to addresses in the town every day, mostly by small (Transit type vans or smaller) delivery vehicles. This results from "just in time" deliveries and internet shopping. The delivery process is highly competitive, buyers may be able to choose delivery time slots and or track the delivery's progress and this creates pressure on the town's road systems and accessibility.

- b. the rise in levels of car ownership brings increased demand for parking space. This is a contentious issue, as, without enforcement (Oct 2018), all parts of the town suffer from poor, inconsiderate and often illegal parking which causes annoyance, interferes with traffic flow and at times risks the progress of emergency vehicles. The lack of enforcement results in overstaying, increasing the difficulties, particularly for town centre residents and traders.

45.6 There are few recent traffic studies on which to draw, but one, the 1993, the Rye "Town Initiative" stated that "Over the past few years there has been growing recognition of the pressures imposed on the town by visitors and traffic during the peak visitor period. Whilst acknowledging the economic benefits of tourism, it is important that the quality of the town for the local community is not disadvantaged". The position today is little changed.

45.7 Parking remains a major issue for the Community in Rye particularly as there is currently little effective enforcement by Sussex Police (parking offences are not a priority) and there is no Civil Parking Enforcement (CPE). With 1m visitors per year and increasing numbers of festivals and events; limited parking in and around the Citadel, there has been much discussion about parking issues. This has resulted in an overall strategy in the Aspiration section of the Plan.

45.8 The Plan acknowledges Rother's assessment that there serious geographic constraints affecting any new development, including the allocation of space for vehicles. For new developments, we have considered the factors identified in NPPF 2018: " policies should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles"

45.9 In particular, we have noted that

'Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification"

45.10 The justification for Rye is that with limited local public transport and with all the development sites allocated adjacent to areas where there is limited or no parking ; or with restrictions, or near parking areas favoured by visitors, the community is keen that all new developments have adequate integrated parking and do not cause parking "spillage" into other areas.

45.11 We have looked at existing dwelling areas, including Valley Park, to assess the average numbers of cars, vans, trailers and caravans. As Rye is a rural location

most householders have at least one vehicle; many have two. We also notice that with more working youngsters living with parents they add to the vehicle ownership. In both the East and West of the Parish there are large numbers of additional vehicles overnight in the form of vans and work vehicles.

45.12 Of the 2500 homes in Rye we assess that around 25% have no parking allocation because there have neither integral space nor roadspace because of parking restrictions. This aggravates the demand for spaces in other places including unrestricted public roads. A visit on any day to roads with no restrictions such as in the Grove, Tillingham Ave and Military Road will demonstrate that there is a high rate of on street parking usage day and night.

45.13 Equally with visitor parking in high demand we want to deter visitors avoiding the pay parks by encroaching into dwelling areas thereby preventing residents from parking. This will require careful consideration by developers. This type of encroachment occurs now across Rye. There will be risk of more of this on new developments because all allocated sites are within 10 minutes walk from the Centre and eventually we will achieve CPE.

45.14 In short we do not want new development aggravating existing parking issues. One way the Plan can help is to set high levels of parking spaces in all new developments unless the developer can demonstrate that there is alternative provision nearby. This is written into the transport policy.

45.15 Cycling is popular but provides it own challenges in terms of safety on high volume roads. Currently well over 80%<sup>53</sup> of the cycling in and around Rye is for leisure and recreational purposes, including tourism. The abilities and confidence of cyclists vary hugely, as, far too often, does their knowledge of what is legal and safe. Pedestrians, especially those who are elderly or have mobility difficulties, complain of being harassed and frightened and there are serious concerns about the risks that cyclists create, for themselves as well as for other road users.

45.16 Within the Community there are widely varying views on the necessary balance between the needs of vulnerable users: pedestrians, cyclists, children and those with mobility difficulties with those using vehicles. Many consider that this Plan should allocate priority to pedestrians and cyclists so that the environment can be enjoyed by all those visiting, living, studying and working in Rye. Others favour a much more liberal regime, allowing universal access and unfettered parking and van deliveries.

45.17 Rye TC has been proactive in seeking solutions to current issues, but most depend on partnership action with other bodies (Rother DC, ESCC, the Highways England, private bus companies, Network Rail, and of course all road-users).

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<sup>53</sup> ESCC Cycling Study 2015



45.18 Although not directly spatial, the work has included a consideration of bus and rail services.

- a. Bus services have emerged from ESCC's 2014 review of its supported services in relatively good shape, but there are concerns about a reduction of services to some nearby villages.
- b. There remains a call for an increase from the current hourly frequency on the single line Marshlink rail service (from Ashford to Brighton) to half hourly. Any such development now rests with the possibility of a Fast Javelin link from Ashford to Bexhill. This link would provide an alternative eastward route to the troublesome Tonbridge line between the South Coast and London. However, despite this possible improvement, which would be seen to result in business regeneration, this proposal is not without its critics. Some have aired concerns about further pressure on parking close to the station and increases to house prices as Rye would then serve a realistic London 'commuter' area.

45.19 In reviewing the situation, we have set out to answer some key questions:

- a. How prepared and suitable are the existing public transport links in Rye for future population growth and development?
- b. What needs to be improved as a priority and how?
- c. How and where should pedestrian routes be improved to encourage walking and cycling within Rye?
- d. How should the issues of traffic, congestion and parking be addressed?
- e. What is the quality of the existing infrastructure in Rye and what is missing?

45.20 Given the broad sweep of the Plan, traffic issues have been considered strategically, other detail is in the Section of Aspirations. Lessons from other Neighbourhood Plans indicate that we should be innovative to encourage sustainable travel including local community transport and street environments that significantly reduce the impact of traffic on the town's community life.

## **Community Feedback**

45.21 Many residents express concern about traffic, in particular parking and transport issues in the Residents' Survey and in many conversations. An underlying message from the Community is that we should encourage sustainable travel including local public transport within street environments that significantly reduce the impact of traffic on the town's community life. But many underscore the inadequacy of parking around the Centre, restricting access for everyday business. Residents, traders and visitors invariably seek improved management of traffic, particularly in locations where there is a risk to pedestrians, cyclists and other vulnerable road users.

45.22 Some in Rye press for a resurrection of the earlier plans/proposal for a bypass. This was first formally recorded as a serious proposal on 2 July 1992<sup>54</sup>, when the then Department of Transport asked Cooper McDonald and Partners, Epsom Surrey to consider the issue. A planning project looked at various routes which were variously priced at around £30m. Of all the considerations, the "southbound route", across the Marsh, was the only found feasible. The others being to the north in the AOWB or alongside/over the railway line.

45.23 There was much discussion in 1993<sup>55</sup> and 1996. Initially the bypass project was allocated priority 2 unfunded status. Later (1995/6) all major road projects east of Hastings were withdrawn as the focus moved to the Bexhill-Ridge link feeding traffic up the A21. The RNP has reflected on this history and because government advise that further work on any such proposal is unlikely, the RNP avoids pressing the case because, as a strategic project is beyond the remit of neighbourhood planning, and it is judged that any initiative is unlikely to receive formal or public support, because of high cost; potential damage to the Nature Reserve/SSSI sites to the south of Rye.

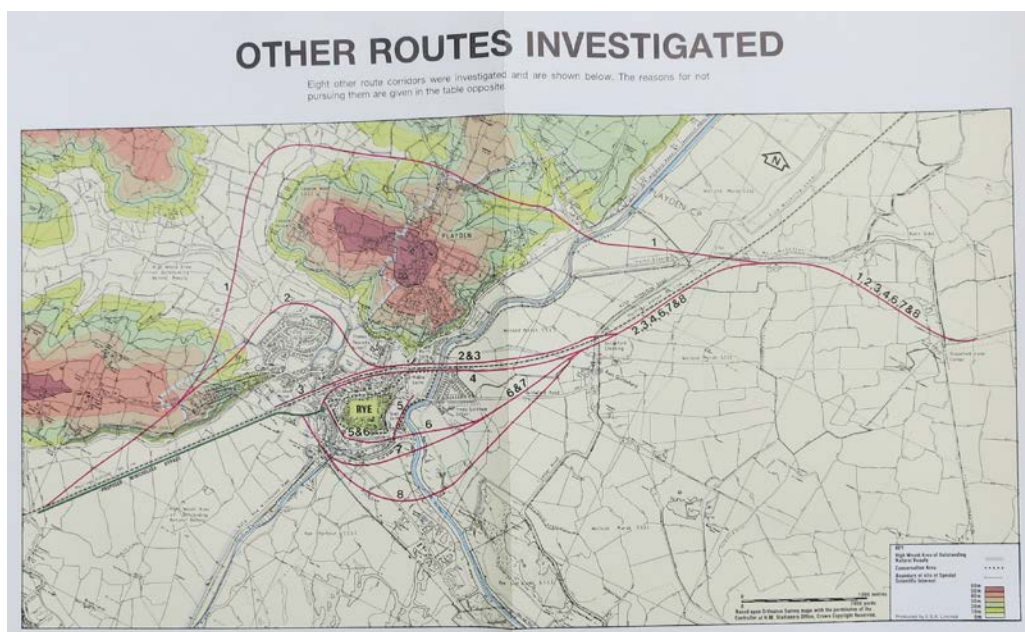


Figure 30: 1993 Rye Bypass Proposal

45.24 However, the RNP does provide an opportunity to consider other measures necessary to handle strategic through traffic issues, particularly for the main coastal highway, the A259. These are considered further in the Section 8 as aspirations.

<sup>54</sup> Cooper Macdonald Website provides an outline

<sup>55</sup> Rye Transport Initiative by ESCC July 1993

45.25 The policies focus on aspects which the RNP can deliver: aspects of parking in new developments, aspects of connectivity for pedestrians and cycles. Others are found in the aspirations in Section 8.

**Traffic management and accessibility: Reasons for the policies.**

45.26 The Community accepts that walking, cycling and the use of public transport should be encouraged.

45.27 In all development there must be a detailed consideration of access and connectivity to existing and proposed routes leading from dwellings to the Town Centre and its services. Car ownership levels in Rye are up to the national average but parking is limited. On street parking is so restricted that the building of a centralised community garage or car park would be strongly supported, but no site has been identified.

45.28 The Rye Bay and Romney Marsh area has huge potential for cycle tourism. Rye should be the centre and natural hub for expansion and facilities. Within Rye, there is scope for improved connectivity, with better cycle routes and secure cycle parking to encourage cycling – as well as making it easier to cycle (and walk) within Rye. More cycle parking provision is also needed to encourage this mode of transport and to meet existing demands.



Figure 31 : Cycle and Footpaths

45.29 The Plan addresses community concerns for inadequate car-parking provision in new residential development. Some recent developments have had been approved with inadequate car-parking provision resulting in serious highway and amenity problems. In such cases local residents, visitors to the area and service providers, (including emergency services) have reported difficulties in accessing the residential areas affected because of the high levels of on-street parking. Such levels create a poor urban environment to the detriment of local character and visual amenity.

## Sustainability

45.30 These policies seek to contribute to sustainable development by:

- a. encouraging a shift to more sustainable forms of transport.
- b. creating a more active and safer community for all.
- c. reducing the dependence on vehicles for local movement
- d. providing sufficient vehicle parking in all new developments

## **Theme 6: Infrastructure and Community Facilities**

46.1 All developments will have due regard to obligations under the CIL/S106 regulations<sup>56</sup>. Developers' contributions (S106/CIL) will subsidise a prioritised list of infrastructure development maintained by Rye Town Council and coordinated with the locally agreed (Rother DC) 123 List and Infrastructure Development Plan, for:

- a. Critical service and utility infrastructure to be provided on-site by the developer and utility providers to ensure development is properly serviced.
- b. On-site infrastructure to be secured through legal agreements based on the needs of each proposal (or group of proposals) and delivered directly by the developer or through financial contributions and/or land. Infrastructure delivery will be integrated with development phasing to ensure timely provision and commuted payments will secure necessary future maintenance.
- c. The design of infrastructure through partnership working with developers and infrastructure providers should reflect the high quality landscape and ensure, where possible, benefits to the economic and social well being of the local community.

46.2 All new developments should involve a consideration of necessary long term infrastructure and arrangements for maintenance (such as through residents' associations). These would apply to aspects such as SUDS<sup>57 58</sup> systems.

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<sup>56</sup> <http://www.rother.gov.uk/CIL>

<sup>57</sup> <https://www.sepa.org.uk/regulations/water/diffuse-pollution/diffuse-pollution-in-the-urban-environment/>

<sup>58</sup> Sustainable urban drainage systems (SUDS) are a natural approach to managing drainage in and around properties and other developments. SUDS work by slowing and holding back the water that runs off from a site, allowing natural processes to break down pollutants.



46.3 Rother District is recognised for its high quality of life and emphasis on community life. With Rye at the extreme end of the District, the Plan should support a vibrant, safe, balanced and inclusive community with a range of facilities for all from birth to death.

46.4 The provision of cultural, sport and leisure facilities to match the future development is vital to support a vibrant community of all age groups and the town's many visitors.

46.5 With an ageing population, the delivery of services and activities in accessible locations is a particularly significant. The Plan seeks to reflect the strong relationship between health, recreation, leisure, culture, heritage and the environment.

46.6 Although this is a spatial plan, the research indicates that there is a need for an over-arching structure to draw together the many threads of community support in a holistic and strategic way. There is presently too much diversification and the "silo" operation of facilities and activities.

46.7 Work on the Plan has addressed how all the present community and cultural centres, such as the Conduit Hill community centre, the Tilling Green centre, the Rye Academy Trust Theatre, St Mary's Centre and Kino relate to each other.

46.8 With increasing pressure on funding, all opportunities should be taken to concentrate functions and maximise use of the key facilities, particularly by users such as the big festivals and events: Arts, Jazz, Bonfire and Maritime.

46.9 In the west of Rye, the former Tilling Green School is being disposed of by East Sussex County Council and a proposal for affordable housing has been withdrawn. The existing school building has been used for several years as a community facility, which has justified future need. Any new development will include a new, energy-efficient community centre, with a range of services to cater for all ages from Early Years to facilities for older residents. There is concern about the future location of facilities such as the Housing Associations, Credit Union, Early Years Foundation Services (EYFS) and nursery facilities.

46.10 There are important club-based outdoor sports and leisure facilities across Rye: rugby, bowls, tennis and cricket. Currently the football club is inactive.

46.11 The indoor leisure centre (part leased by Freedom Leisure) faces financial challenges which risk the continued provision of a publicly-accessible leisure centre and swimming pool. This is of concern to many.

46.12 Following many years of school closures there is a concentration of educational assets and facilities within the Grove-Love Lane “education quarter”. However, there is local concern that the facilities catering for Early Years to post 16 education, even with some planned expansion, will not meet future needs. Future (pre-school) child and nursery care is a particular concern.

46.13 There is wide support for more facilities for younger people but few ideas about how this can be achieved or initiatives to deliver. Consultations with younger residents and students continue. One proposal is for those faltering organisations for younger people should consider sharing within a centrally-located, multi-purpose facility.

46.14 With many in Rye dependent on ‘visitor-spend’, those facilities and heritage buildings much enjoyed by visitors should be maintained and enhanced to ensure their experience remains positive. Importantly, visitors should be presented with a diverse range of ‘reasons to visit’.

46.15 Since the 17<sup>th</sup> century Rye has attracted artists and writers. There are several cultural centres such as the Museum, Art Gallery and the National Trust’s Lamb House. St Mary’s Church provides one of the most visited attractions (views from the Tower are a major attraction). The Town Model in the Tourist Information Centre is viewed by thousands of tourists each year.

46.16 From 2015 there has been the new Kino Cinema. The Plan should encourage such facilities as they provide important visitor attractions but rely do rely on volunteers and sound business plans for survival.

46.17 The Community access medical services in two places locally: the Ferry Road Surgery and the Kiln Road Medical Centre co-located with the Rye Memorial Hospital. The latter is actually in the Parish of Rye Foreign. Capacity and services should expand to cater for the increased population resulting from the implementation of this plan. (Please see Policy AI3)

46.18 Rye churches make a significant contribution to society. There are 6 Christian churches in the town: Anglican, Baptist, Particular Baptist, Methodist, Roman Catholic and Friends (Quakers). There are also 23 others in Eastern Rother linked in "Churches Together in Rye & District". The combined churches provide social enterprise including the hosting of a branch of the Bexhill Foodbank, various counselling services including Alcoholics Anonymous, marriage and bereavement

ministry, educational and cultural events. In 2015 a Rye branch of Street Pastors was launched.

46.19 Rye graveyard has limited capacity but a solution is being found by Rother DC for the future.

46.20 Although Rye has generally low crime rates - particularly Anti Social Behaviour (ASB), drugs misuse and driving related offences - compared with other parts of England and Wales, community safety remains a priority. Keeping crime rates low is a key factor in the town remaining attractive. With a year on year reduction of policing resources, and the move by Sussex Police from a “community policing model” to one that is more reactive, the Plan considers spatial issues such as the use of Close Circuit TV and the need for open and well lit connectivity for safe access to facilities.

46.21 There is strong community support for the retention of Rye's allotments, managed by a Rye based Amenities Community Interest Company (CIC) in two sites: Love Lane (Formerly Butt Marsh) and to the south of South Undercliff (Formerly Factory Marsh). They cater for local needs for those with small or no gardens. There is no waiting list; therefore demand is satisfied by the current space.

46.22 A community garden has been established adjacent to the Love Lane allotments, on a site known as the "Love Lane frontage". This fits well with Natural England's “nature nearby” policy (Accessible natural Greenspace Guidance [NE265]).<sup>59</sup>

### **Reasons for the policies.**

46.23 The NPPF<sup>60</sup> provides a clear framework for the promotion, retention and development of local services and community facilities. The Rother DC Core Strategy sets policies for the protection and enhancement of existing facilities and resists any inappropriate loss.

46.24 Rye serves as a centre for a much wider rural catchment area. As a result, its facilities are of equal value to residents living well outside the parish boundaries. By the safeguarding of local community facilities and services and providing new services, the Plan aims to strengthen Rye's role as a key settlement serving a disparate rural community.

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<sup>59</sup>[http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/regions/east\\_of\\_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx](http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/regions/east_of_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx)

<sup>60</sup> National Planning Policy Framework

46.25 The community is rightly concerned that there should be no loss of facilities, in particular, health services. The community supports the need to improve and retain those community assets important for the community wellbeing and visitor facilities.

46.26 Before approval of any change of use or redevelopment which would result in the loss of any of community facilities, there must be compelling evidence in the form of a business plan which shows that the facility is no longer needed or is no longer commercially viable.

46.27 New recreational and tourism developments will be expected to make a financial contribution to help build service and maintain new and improved facilities, such as public toilets. There is strong community support for the Plan to encourage the improvement and retention of vital community assets.

46.28 There is now a record of successful Amenities Community Interest Company (CIC) operating community facilities such as the allotments and the new Kino site. These are successful models which should be encouraged.

### **Community feedback**

46.29 Community feedback about community facilities and services have focused on maintaining the existing provision of infrastructure as well as expanding and improving these facilities where viable.

46.30 The other key area of feedback has been in relation to sports and recreation space. The majority of feedback from the community has highlighted the importance placed on informal recreation grounds, sports pitches and particularly the retention of the Grove Leisure Centre (renewed contract from end 2015).

46.31 Comments are:

- a. There is a need for a central community hub that could provide a venue capable of accommodating a variety of large events (up to 500 people)
- b. The existing Community Centre on Conduit Hill needs updating
- c. Protect playing and sports facilities on the Salts and the Rugby Club: rugby, football and bowls
- d. More should be done to help the 13-16 year olds socially (provision of activities and facilities)

- e. Existing sports facilities, recreational areas, play facilities and informal green spaces in the town should be protected
- f. Strive to provide appropriate accommodation for the provision of youth services
- g. Tourist Information Centre should be enhanced and made more interactive

46.32 As part of its failed 2016 proposal for the former Tilling Green School , the then Amicus Horizon (now Optivo) consulted the community and made a proposal for community facilities. The result involved a series of considerations as below. As this design followed months of local consultation it is included here for the record.

Design Principles	Delivery Considerations
Consider density and building height Mitigate flood risks: SUDS Provide planting as screening Provide green space Consider parking, traffic and access Consider potential users Consider storage requirements Consider safety and pedestrian access	Satisfy community objections to proposal  Subject to planning proposal  Balance demands of community with need for project to be viable  Consider future management structure: CIC?
Area: 475 Sqm	Community centre





Figure 32: Typical community facility of under 500 sq m

46.33 The Plan considers the spatial aspects of retaining vital community facilities for the community;

### Sustainability

46.34 These policies aim to contribute to sustainable development by:

- a. promoting safer communities.
- b. promoting community participation for all age groups in a diverse range of sporting, recreational and cultural activities.
- c. providing a wide range of facilities in Rye to reduce the need to travel.
- d. increasing the reasons for visitors to come to Rye and support local businesses.

## Theme 7: Environment, Green Spaces and Energy

47.1 In Rye there is a high degree of enlightenment about environmental issues, including the need to balance growth with preservation of the unique environment of Rye. This theme considers both the natural and historic environments.

- a. The government works to protect the natural environment by reducing pollution, reducing the amount of waste sent to landfill, protecting green areas, wildlife reserves and marine biodiversity, and enforcing regulations that keep our water and air clean. In Rye it is widely appreciated that local green space can be a key asset for the Community and should be protected against development. This Plan addresses green space and green infrastructure by designating local green spaces.
- b. The government's definition of the historic environment (part of our cultural heritage) is broad, including planted and managed flora as well as all evidence of the past interaction of people and place including surviving physical remains of past human activity, whether visible, buried or submerged. In addition, the lists of 'designated heritage assets' (listed buildings, conservation areas, scheduled monuments, registered parks and gardens, battlefields and protected wrecks) are all considered incomplete and should not be relied on as a comprehensive guide to the area's valued heritage.

47.2 Rye is blessed with a wide range of green and open spaces: the Salts, Mason's Field, marshland, allotments, the Railway Corridor, former Freda Gardham playing fields and informal areas of grassland/woodland. All these link to the rural and surrounding rural countryside beyond which in turn links to the nearby coast. This is a vital feature of the Town. There is a wide community view that green areas beyond the parish boundary, in particular the 'strategic gap' between Rye and Rye Harbour, should be maintained as green spaces.



Figure 33: Rye from the East

47.3 Some in the Community seek more areas of green space around the town to create wildlife habitat, enhance residents' quality of life and contribute towards the provision of a bio-diverse natural environment. What is important to many is that open space, including gardens, allotments, recreational space, open fields, woodlands and pathways are very important. Natural and semi natural open space is highly valued by local residents not just for its recreational value but also for its landscape character, quiet enjoyment and biodiversity.

47.4 Existing groups - Transition Rye and Rother Environmental Group - are considering future energy use and intend to establish a community energy company (RX) to encourage local generation and measures to reduce energy usage. Energy is supplied by private companies to meet consumer demand (Supply Side Management). This can be an expensive use of resources because of the large reserve of generating capacity that has to be available to meet peaks. If these peaks can be smoothed out by better timed use of energy, especially for space heating, the overall cost of that energy can be reduced (Demand Side Management). A combination of local energy storage (batteries), intelligent control of the local grid, and better controls for individual residents can provide a move from supply side to demand side management, which the plan encourages. The Plan encourages a range of measures to achieve a low-carbon economy with reduced energy usage and local energy production (including renewable energy) .

47.5 For many, light pollution is an issue. The Campaign to Protect Rural England (CPRE) claims that only around one 10<sup>th</sup> of the country enjoys a truly dark night sky.<sup>61</sup> The Plan takes into account the relevant policies of the Core Strategy and the DaSA<sup>62</sup> Many in the Community regard the night sky as an amenity. Rather than set our policies the Plan adopts national and District policies to conserve energy, through the use of best available technology and to have regard to the lighting levels recommended by the Institute of Lighting Professions (ILP).

47.6 There are no local facilities for disposing of bulk domestic waste. Items which cannot be removed through the Rother DC system waste service have to be collected by private contractors at cost or carried to the household waste sites at Mountfield (East Sussex) or New Romney (Kent), both over 30 minutes driving time.

47.7 A summary of comments on the environment raised by local people include to:

- a. Recognise that green infrastructure linking town to countryside is essential

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<sup>61</sup> <http://www.cpre.org.uk/resources/countryside/dark-skies>

<sup>62</sup> <https://www.rother.gov.uk/CHttpHandler.ashx?id=27125&p=0>

- b. Ensure that all regional footpaths and cycle routes, woodlands and rivers are accessible to both residents and visitors; support the South Coast Pathway.
- c. Provide open spaces within all new developments and consider connectivity and public access.
- d. Require more planting; development must not result in reduced number of trees and shrubs indeed consider planting more variety, such as wild flowers, trees and shrub plants.
- e. Protect the historic environment: as our cultural heritage. The evidence of past interaction of people and place including surviving physical remains of past human activity, whether visible, buried or submerged should be conserved. This includes the 'designated heritage assets' (listed buildings, conservation areas, scheduled monuments, registered parks and gardens, battlefields and protected wrecks).
- f. Consider the wide potential for further heritage assets of national importance that might be present within the plan area.
- g. Consider both noise and light pollution.

### **Reasons for the policies.**

47.8 Natural Environment: Neighbourhood Planning<sup>63</sup> offers opportunities to protect and improve environmental assets and places valued by local people such as archaeology, historic buildings, green spaces, Local Nature Reserves, and Registered Parks and Gardens. This could include maintaining sites and their heritage assets, promoting the repair and re-use of redundant historic buildings, opening up new opportunities for recreation, access and leisure, and designating Local Green Spaces.

47.9 Historic Environment: The NPPF and the Planning Practice Guidance require that decision-making aims to sustain the significance of all historic (heritage) assets in the historic environment, including non-designated assets, such as the

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<sup>63</sup>

[http://www.ourneighbourhoodplanning.org.uk/news/2012/07/30/Planning\\_for\\_the\\_Environment\\_at\\_a\\_Neighbourhood\\_Level](http://www.ourneighbourhoodplanning.org.uk/news/2012/07/30/Planning_for_the_Environment_at_a_Neighbourhood_Level)

archaeological sites and historic buildings recorded on the County HER<sup>64</sup>. Indeed we understand that there is potential for further heritage assets of national importance to be present within the plan area, as well as other remains of more local importance that, nevertheless, merit consideration in planning decisions. Whilst it is not subject to an official ‘heritage designation’ The NPPF states that “Harm to conservation areas can be caused in any number of ways including through development within their boundary or within their setting, with or without demolition being involved. Their conservation should always be given ‘great weight’ and any harm can only be justified if the application clearly and convincingly shows that the harm will be outweighed by public benefits. Total loss of a whole building or other significant element, such as a square, may amount to substantial or less than substantial harm. It is more likely to be substantial harm if the building is of a type that makes the area worthy of its conservation area designation.”

47.10 Romney Marsh is a landscape that readily meets the definition of a heritage asset and Historic England has recommended that it was identified as such in the SEA scoping report along with the need for the plan (as it appears to endeavour to do) to sustain its significance.

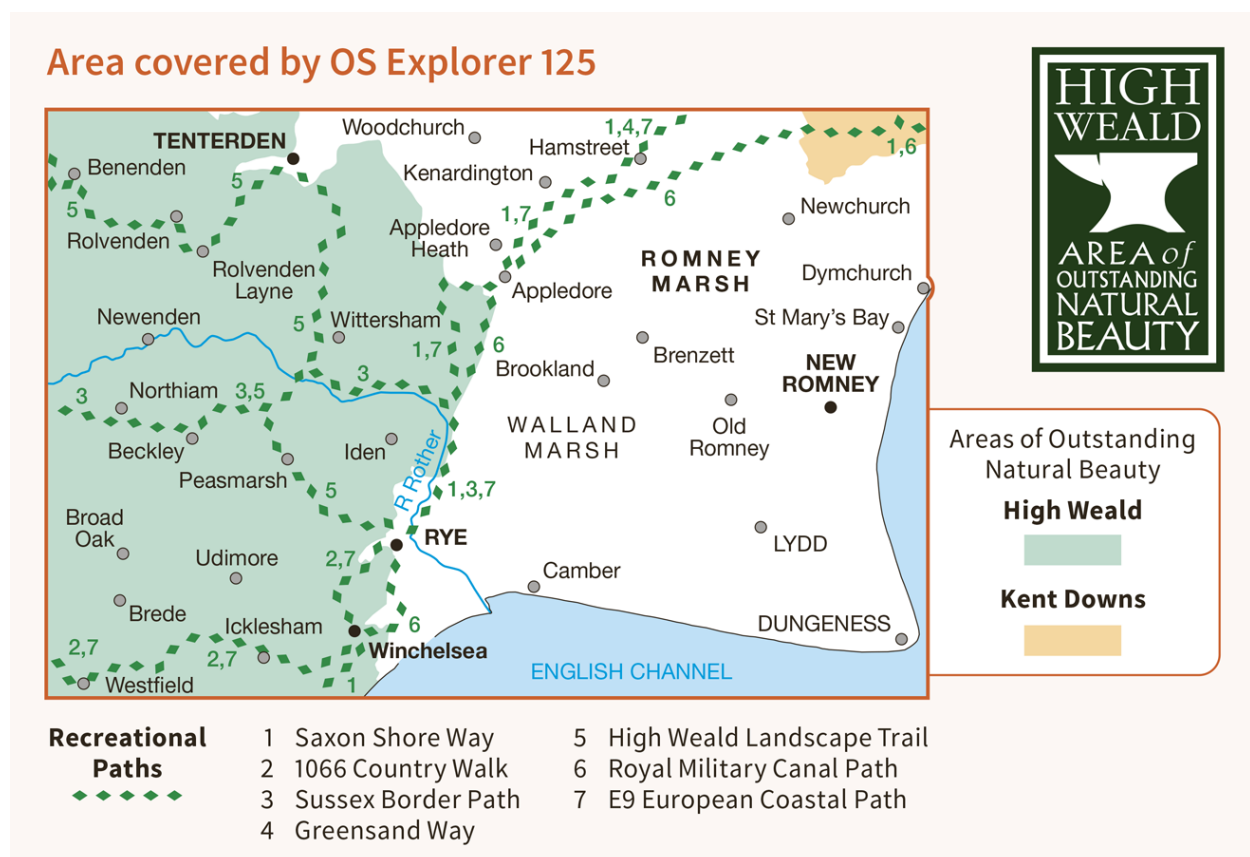


Figure 34: Romney Marsh

<sup>64</sup> <https://www.eastsussex.gov.uk/environment/archaeology/her>



47.11 The SEA /SA includes a consideration of how these assets are valued – their contribution to the economy of Rye (as an attraction for tourism as well as a key feature of its attractiveness for Rye as a place to live and work). They also provide opportunities for social interaction and as such are important to the health of the population (the quality of the environment including a sense of place makes a major contribution to individual mental well-being). The SEA/SA helps us to understand the ‘trajectory’ of issues affecting the historic environment in order that the impact of decisions within the plan-making process on these as potential ‘cumulative’ impacts or enhancements can be judged. The conservation area appraisal and extensive urban survey provides information on identified issues affecting the area, whilst the community may use their own knowledge of issues.

47.12 The sites adjacent to Rye’s river channels all have an unknown but potentially high potential for the presence of archaeological remains given the ancient origins of the town and its maritime history. The colonisation and reclamation of riverside land is recognised as a process that, in many cases, has taken many centuries, in some cases requiring considerable engineering and ‘ground making’ even in antiquity. This is likely to create waterlogged conditions suitable for the preservation of organic remains (such as timbers, leather and textiles) that have a high level of interest. Historic England has recommended that any allocation of sites in these areas positively identifies the potential for the presence of previously unidentified archaeological remains and sets out a requirement for planning applications to develop these sites to be supported by the findings of a programme of archaeological investigation undertaken according to a watching brief agreed in writing with the Council’s archaeological advisor.

47.13 The community expressed strong support for action to address climate change and were positive about finding ways to achieve sustainable development locally. Many agree that the Plan should:

- a. contribute to the global objective of reduced CO<sub>2</sub> emissions by 2050. Every proposed development or change to an existing structure should be reviewed in that light to assess how the development meets that goal.
- b. encourage a move towards a low carbon future in a changing climate, particularly to achieve better energy efficiency.
- c. acknowledge that many residents are opposed to large scale wind power in the Rye area but will consider other alternative energy sources.
- d. encourage the protection and improvement of Rye’s water and air quality

- e. aim to protect local greens space and green infrastructure

47.20 Rye should consider 'Walkers are Welcome' status and this would underscore the need to take opportunities to integrate any new developments with the existing rights of way network and enhance existing provision by creating new links wherever possible.

### **Settlement Boundary and Strategic Gaps**

47.21 Development boundaries around settlements are a well-established planning policy tool in East Sussex. The NPPF also seeks to protect the different roles and character of different areas. Boundaries provide a clear and readily understood indication of where development would, and would not, be allowed in principle. Within development boundaries there is a presumption that infilling, redevelopment and changes of use will be acceptable subject to other policies of this plan. They help to focus development and investment into sustainable locations and to protect against intrusive development beyond the substantially built-up areas of towns and villages.

47.22 Partly to meet the targets set by the Core Strategy and partly to reconcile present use, two sites are considered for inclusion within the development boundary: part of the former Freda Gardham Site, owned by ESCC, for brownfield development and the Gibbet Marsh site, owned by Rother DC, for confirmation as a car park and amenities site. Both these are considered in the SEA/SA and Site Assessment paper.

47.23 These are the only two locations where a change to the settlement boundary is considered. The Core Strategy sets one strategic gap where development is strongly resisted: the gap between Rye and Rye Harbour. The reason is to protect the character and profile of unique Rye from further development.

### **To protect Local Green and Open Spaces; to encourage more green infrastructure.**

47.24 Effective management of habitats may be seen within a wider approach to 'green infrastructure'. This is defined by the Rother DC Core Strategy as a strategic network of multi-functional green space which supports a wide range of purposes:

- a. The creation and enhancement of a sense of place,

- b. Provision of recreation opportunities,
- c. Preservation and enhancement of biodiversity,
- d. Sustainable transport routes,
- e. Improved water resources and flood management,
- f. Contribution to climate change adaption and mitigation.

47.25 Rother DC sets out policies for green spaces and amenities.<sup>65</sup> There are targets set out in Natural England's standard for accessible natural green space (ANGSt) and the follow-on work led by East Sussex County Council.<sup>66</sup> Given the specific environmental context of Rye, with its high quality historic built environment and public realm, the distinctive character of its landscape setting, its proximity to internationally protected habitats and its exposure to potential flooding, the consideration of and compliance with these policies will be of paramount importance.

47.26 The Plan will support development which:

- a. integrates new multi-functional open space within it.
- b. actively seeks to improve the connectivity of green infrastructure , including local green spaces, and enhance biodiversity (and not supporting development which further fragments green infrastructure and impacts negatively on biodiversity).
- c. increases the number of trees in streets
- d. designates green infrastructure including local greens spaces to protect them from development, while encouraging gardens and permeable surfaces.
- e. integrates biodiversity improvements within any renewable energy installations<sup>67</sup>

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<sup>65</sup> <http://www.rother.gov.uk/CHttpHandler.ashx?id=6405&p=0>

<sup>66</sup> <http://sussexlnp.org.uk/documents/EastSussexGISstrategyFinal.pdf>

<sup>67</sup> Research by the Building Research Establishment shows that where a Biodiversity Management Plan is developed, field based solar farms can deliver habitat enhancements

**To promote conservation of the historic environment.**

47.27 From times before the rule of Edward the Confessor, the region along the south coast including Rye, was under the rule of the Abbey of Fecamp in France. This was returned to the English crown in 1247 by Henry III, except for a small region to the north of Rye, known as Rye Foreign despite it being English since the Reformation.

47.28 Under English rule, and following the attack by the French who burnt much of the Town in 1377, Rye underwent regeneration and fortification. This was begun with the building of the town wall and four gates; Landgate, Strandgate, Baddings Gate and Postern Gate. The strength of this defence was tested when the French invaded again in 1449, once more setting fire to buildings, although not causing the scale of devastation as previously. Modernisation of defence was implemented in the 15th and 16th centuries but today only one of the gates remains; the Landgate. The remains of these medieval defensive structures, including the Landgate and Ypres Tower, form the core of the heritage buildings today.

47.29 Development which may have an impact on the setting of the Rye Conservation Area, as well as the numerous listed building and other heritage assets in the area should be of a higher standard of design, or more locally specific response to ensure this avoids or reduces harm to the area's character or appearance. Development control officers within the planning department will find it easier to insist on this as a requirement if the need to demonstrate that proposals have been designed to complement and sustain the key positive characteristics of the heritage assets is required in the allocation policy.

47.30 **The Rother barge “Primrose”** has been offered to Rye by Hastings Museum – relocate to display on the Strand . This barge is the only surviving Rother Barge and before Hastings it lay in the mud on the River Rother.

47.31 The NPPF expects local planning authorities to have a positive strategy to promote energy from renewable and low carbon sources. In response, the Core Strategy has a strategy (Policy SRM1) ‘Towards a Low Carbon Future’ designed to mitigate and adapt to the impacts of climate change. The Rother DaSA<sup>68</sup> further tackles energy conservation to which this Plan conforms.

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<sup>68</sup> <https://www.rother.gov.uk/CHttpHandler.ashx?id=27125&p=0>

## **To encourage measures to handle landslip and rockfall**

47.32 Planning Policy Guidance (Note 14) sets out the broad planning and technical issues in respect of development on or close to unstable land. Building Regulations state that "The building shall be constructed so that ground movement caused by - ... landslip ... in so far as the risk can be reasonably foreseen, will not impair the stability of any part of the building."

47.33 There are several locations across Rye where there has been a record of rock fall and landslip since medieval times: land above Military Road; the boundaries of the Citadel where there was no Town Wall; Cadborough Cliff.

## **Sustainability**

47.34 The Government is committed to sustainable development, by balancing the stimulation of economic growth with the maximisation of well-being and protection of the environment. This Plan seeks to introduce low carbon planning<sup>69</sup> in its policies. There must be minimal negative impact on the ability of future generations to do the same. Sustainable development recognises that the three 'pillars' of the economy, society and the environment are interconnected.

47.35 Rother District Council Core Strategy states that "At the heart of planning, at all levels, is the principle of 'sustainable development'."

47.36 Long term economic growth relies on protecting and enhancing the environmental resources that underpin it. It must also pay due regard to social needs.

47.37 The policies intend to contribute to sustainable development by, protecting and enhancing the range and populations of species and the quality and extent of wildlife habitats. They must ensure the efficient use of land and material resources and maintain important hedgerows, trees and woodland so that natural features are protected.

47.38 These policies aim to contribute to sustainable development by:

- a. creating active and healthier communities for all.

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<sup>69</sup> Low Carbon Neighbourhood Planning by the Centre for Sustainable Energy, Bristol [info@cse.org.uk](mailto:info@cse.org.uk)



- b. promoting community participation in a diverse range of sporting, recreational and cultural activities.
- c. protecting and enhancing the range and populations of species and the quality and extent of wildlife habitats.

## **Section 5 – Community Aspirations**

5.1 The process of preparing the RNP has resulted in the community raising a significant number of actions that are not directly spatial but do have relevance to a Neighbourhood Plan. These are considered no less important; indeed many would help to address the problems that have been created by development in the past. They might also mitigate the impacts of future development in the Neighbourhood Plan.

51.2 The aspirations (unfunded intentions) of the community have been identified as either “Community Projects” or projects to be handled by partners. Each will need to be considered by separate project teams, studies completed and if agreed then funding sought from a mix of sources: from partners, from community grants, from S106/CIL developers’ contributions, or from private sources.

### **Community Projects: Reasons for the policies.**

51.3 We have argued that Rye not only serves as a centre for a much wider rural catchment area (with perhaps 25000 people) but also receives 1million visitors per all year round. As a result, Rye’s facilities are valued by many from near and far.

51.4 There is strong community support for the RNP to encourage the improvement and retention of vital community assets. There is particular concern about services such as medical and health. Before approval of any change of use or redevelopment which would result in the loss of any of community facilities, there must be compelling evidence in the form of a business plan which shows that the facility is no longer needed or is no longer commercially viable.

51.5 New recreational and tourism developments would be expected to make a contribution to enhance local services and provide more “reasons to visit”.

51.6 There is now a record of successful Amenities Community Interest Company (CIC) operating community facilities such as the allotments and the new Kino site. These are successful models which the Plan encourages.

## Enterprise

51.7 Rye Town Council should work in partnership with local authority, Local Enterprise Partnerships (LEPs), businesses and training providers to enable training and skills development. Local apprenticeship schemes will be strongly encouraged.

51.8 Rye should be promoted in a more coherent and coordinated way, drawing together the multiple organisations involved. Integrated marketing should result from a more joined up approach. Websites should provide links to the others where appropriate and should be updated regularly providing information about events, accommodation, transport and any other information needed by visitors.

## Traffic Issues

51.9 The RNP draws on the 1993 Rye Initiative, aspects of which were reconsidered by Rother DC and the Rye Partnership in 2006. This Plan starts with a consideration of a strategic design concept: an updated version of that drawn from the past as below (Rye Town Initiative -1993). The Plan considers historical proposals as below.

- a. **The Bypass Proposal**<sup>70</sup> – Dismissed by the Government along with other strategic projects to the East of Hastings, but now re-considered. On the grounds of conflict with government policy, environmental impacts and probable high cost, however desirable to some, the Plan does not seek actively to pursue. Please see further consideration in Theme 5.
- b. **The Through routes** – improvements to these are beyond the scope of this Plan because they are strategic roads, however because issues have been raised and there were earlier proposals, this is recorded for further study. This aspiration<sup>71</sup> AT1 links to AE2 below.
- c. **The Town Gateways** – The Rye Initiative (1993) made recommendations about these which are generally considered to hold good today. Of the identified inner Town “gateways” two should be considered for improvement.
- d. **Winchelsea Road to the Strand.** This location is part of the gateway to Rye from the West, a visitor attraction and therefore should be subject to further study. With its heritage buildings, cafes and antique shops, it is a major tourist attraction, but cars and people are mixed to the extent that safety is compromised. Many desire the location to be more pedestrian

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<sup>70</sup> Bypass Proposals of 1992 – 1993

<sup>71</sup> <http://www.marksbarfield.com/#/projects/>

friendly and conducive for visitors. Various proposals have been made in the past.

- e. **Ferry Road- Station Approach** The Station Approach is Rye's multi-transport hub (railway station, bus stops, taxi rank, coach and car parking). It has related vehicle parking (National Rail and former Cattle Market), for cars and coaches, which is vital for those working in and visiting the Town. This hub at peak times of travel and on Market Days, sees pedestrians crossing in all directions competing with vehicles travelling through Rye and manoeuvring to park. Safety of the location could be enhanced by considering innovative solutions such as "shared space" or multiple crossings. Clearer information displays and signage should also be provided, rather than the current confusing system. As part of the Sainsburys proposal for a 2<sup>nd</sup> supermarket Station Approach improvements were planned under a S106 agreement.
- f. **The Strand Water Project and Bypass** Marks Barfield Architects<sup>72</sup> carried out a study for Rother DC and the Environment Agency. This looked at ways of relieving traffic on the A259 around the Strand Quayside Broad Location and improving the location to make it more attractive for visitors. This Plan resurrects the study and proposes not only an improvement to the A259 in AT1 but also have environmental benefits.

51.10 Traffic improvement aspirations would require partner cooperation and funding. Some funding can be found from CIL and this would be prioritised accordingly by Rye TC. Since the late 1980s, there have been few traffic initiatives resulting in change and improvements.

- a. In 1987/8 the Ferry Road/Crownfields/Station Approach/Cinque Ports Street one-way system was introduced when a supermarket was built on the site of the former bus depot. The system is redolent of road design of that time and does not properly address the needs of pedestrians, bus/train passengers and road users. The scheme proposed in 2005 for this area would have exacerbated the situation and the more recent Section 106 plan from the 2013 supermarket plan does not offer real improvements. During the last five years, there has been:
  - b. an extension of parking restrictions in South Undercliff to 7 days a week;

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<sup>72</sup> <http://www.marksbarfield.com/#/projects/>

- c. the introduction of a one way system in Deadmans Lane.
- d. the creation of a single central High Street loading bay, which has had some positive effects on traffic problems in the centre of town, but without traffic enforcement is often used for unauthorised car parking.

51.11 The RNP strategy focuses on a wide range of issues raised by the Community. These can be grouped as below.

- a. **Strategic Through Traffic:** There is rising and fast flowing strategic through traffic on roads which are narrow and considered unsuitable. The Community has raised issues of safety, vehicle size and weight, poor road surface and signage and pollution affecting adjacent dwellings along roads as below:
  - a. A259 East to West
  - b. A268 to/from the North
  - c. B2089 to/from the West
- b. **The Town Inner “Gateways”** could be improved both to enable better safety and environment. These are located at:
  - a. A259 Fishmarket location to/from the East
  - b. A259 Winchelsea Rd to/from the West including to the Strand.
  - c. A268 Landgate – Rye Hill to/from the North
  - d. B2089 Ferry Road - Station Approach to/from the West.

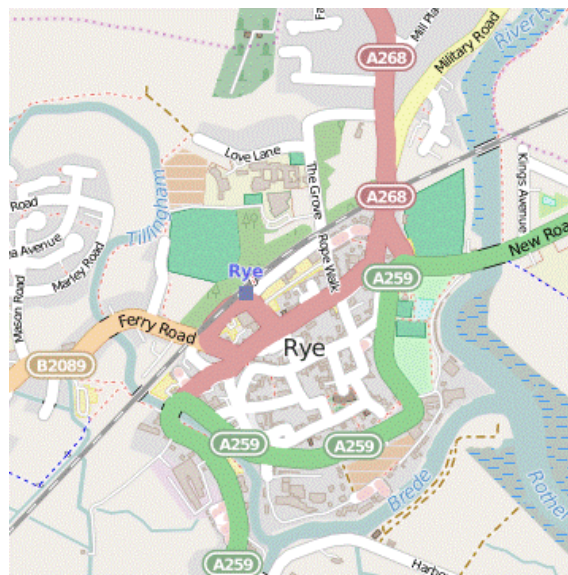


Figure 50: Rye Through Routes

- c. **High Street.** Comments from both the community and visitors indicate the need to create a more pedestrian-friendly and more 'active' Town Centre. The speed of traffic needs to be reduced and the control/management of on-street car parking improved. Pedestrianisation is impracticable because of the lack of rear access for delivery vehicles and community transport. There are innovative options such as "Shared space"<sup>73</sup> but to move from established practice requires political will and determination, careful thought and observation, and the courage to explore and refine new solutions. Local examples work well in places such as Ashford and Petworth.



Figure 56: Examples of shared (road) space

- d. **Inner Citadel:** 2014 has seen tensions arise without workable solutions. Timber framed medieval houses, cobbled surfaces, fragile narrow and often uneven pavements are all adversely affected by too much heavy and speeding traffic on the inner Citadel roads. Pavements are routinely mounted by vehicles in attempts to pass in single track roads, endangering pedestrians property and street furniture. To protect the historic fabric, vehicular access to the centre should be controlled more tightly.
- e. **The junction Mermaid Street, Mint and Wish Ward** This busy junction brings together traffic from 5 directions. The roads are badly marked and approaching traffic cannot see vehicles in all other access roads. Across the centre in all directions pedestrians move between key attractions.

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<sup>73</sup> A term for an emerging approach to urban design both to reduce the adverse impacts of traffic in town centres and increase the safety of pedestrians. Although there is steep learning curve initially, it is seen that the Public quickly see the benefits.



- f. **Cinque Ports Street**, through traffic moves quickly in both directions with pedestrians crossing throughout.

**51.12 Vehicle Parking.** Issues have reached such contention that traffic risks town centre vitality, viability and safety for all those who live or visit there. This Plan sets out a broad improvement strategy but much more work is necessary to reconsider vehicle parking arrangements to better suit the needs of the various “communities”: Town Centre residents, outlying residents, traders and business community and visitors. There needs to be a reconsideration of access, short stay parking and signage. In 2016, public discussion resulted in an inconclusive 2016 Public Meeting with the Sussex PCC to address the issues. Many residents have expressed concern about traffic and transport issues in the Residents’ Survey, highlighting problems of congestion; the dangers caused by on-street parking; the impact of HGV traffic through the historic narrow streets; and risks to pedestrian and cyclist safety. We have had significant feedback from the community that parking is a problem throughout the town. There were a range of issues. Some people felt that parking provision in the town centre was insufficient; other areas suffered from town centre workers parking in residential areas. With some 900 parking places, the town has significant parking capacity but at peak times, some are not full. Visitors must be encouraged better use of the existing car parks. However, with over 160 new homes in this Plan, increasing car ownership and visitor numbers, it is reasonable to assume that there should be an increase in the town’s parking capacity over the next 15 years. To achieve this, there was widespread support for the retention of the former Cattle Market (privately owned by the Cattle Market Company) as a park. Others have proposed a consideration of some limited multi-level parking proposals: in the former Cattle Market and at the Freedom Leisure car Park. On street parking control and greater clarity of signage should be considered. There are many tiers of parking costs across the Town dictated by park ownership. In many parking costs are high and encourage residents, visitors and town centre workers to seek free parking in residential areas. Central Government’s austerity measures mean that Sussex Police is reluctant to commit the necessary resources to enforce parking and low level traffic management measures. With no de-criminalisation of traffic offences in Rother DC and little expectation that any early decision to do so will be taken, enforcement of traffic regulations is a major issue. The needs of drivers with “blue badge” entitlements have to be balanced with efficient traffic flow. Despite parking restrictions, some narrow roads are often dangerously impeded by parked vehicles sporting blue badges. With infrequent enforcement misuse is an issue. A strategic and holistic review is recommended, which should build on the work completed in the past, including as part of the 1993 Initiative. The Plan suggests an outline strategy and in particular a coherent strategy to improve parking throughout the town:

**51.13 Electric Car Facilities:** Electric cars are becoming more frequent but there are no facilities in the area. Charging points should be established centrally perhaps at the Station and in all new developments of 10 plus dwellings.

**51.14 Out of Town Bulk Delivery Handling:** With increasing use of internet suppliers and “just in time” supplies for business there has been a rise in the number and frequency of LGV, HGV and vans entering the Town. Currently some companies such as Hermes Logistics and the Tuscan Restaurant use large supply vehicles to drop off at out of town storage (3 miles away in Rye Harbour where there are facilities for storage and handling). Smaller vehicles then supply goods to the Town Centre. By wider adoption of this process larger vehicles (up to 7.5T) could be restricted or removed from the High Street.

**51.15 Improved Road Signage** To provide greater clarity of directions to car parking within the town and in response to comments and concerns of misunderstanding, clearer signage and better road markings are required. Car parking control zone signs should be located at key entrances to the town particularly into the Town Centre. Well designed signs should also be placed to divert incoming traffic to those car parks acting as “interceptor parks” (Figure 49).

**51.16 Speeding.** The local Police Panel lists speeding as one of its top three priorities. Traffic calming and speed reduction measures have been considered for the main through roads. This Plan has considered several proposals to improve road safety and reduce the hazards caused by speeding vehicles (particularly those coming into the town) by the main access routes. Innovative roadscape design would tackle speeding from the High Street to the Strand and at the busy Station Approach.

**51.17 Rail Connectivity** In its relatively isolated location at the eastern end of East Sussex, the Plan encourages improved infrastructure (road and rail) to increase connectivity to and from Rye. In other areas of the Country, improved rail transport is providing better access to employment and education. Many, but not all, aspire to seeing the Fast Javelin Service (also known as HS1 extension) extended from Ashford to Bexhill with a stopping service at Rye. As and when fast Javelin rail services arrive to serve Rye, more parking will be needed for those coming into Rye from surrounding areas to catch trains. Two strategic rail improvements will be supported:

**51.18 The Rye and Camber Railway** was opened in 1895 to connect Rye with a new golf course at Camber. The Rye & Camber Tramways Co. Ltd was liquidated in February 1949. Originally designed to cater for the transportation needs of golfers and their caddies to Rye Golf Club from Rye, the steam railway also took fishermen from Rye to their fishing boats moored opposite Rye Harbour village, where a river

ferry could be hailed. During WW2 the line served military purposes between Rye and Rye Harbour (East Side). When built it was entirely on private land. Sections of the track and some infrastructure remain today. A renewal project would be ambitious but would enhance “green” tourism and would chime with trends in other parts of the Country where old rail lines have been reinstated.

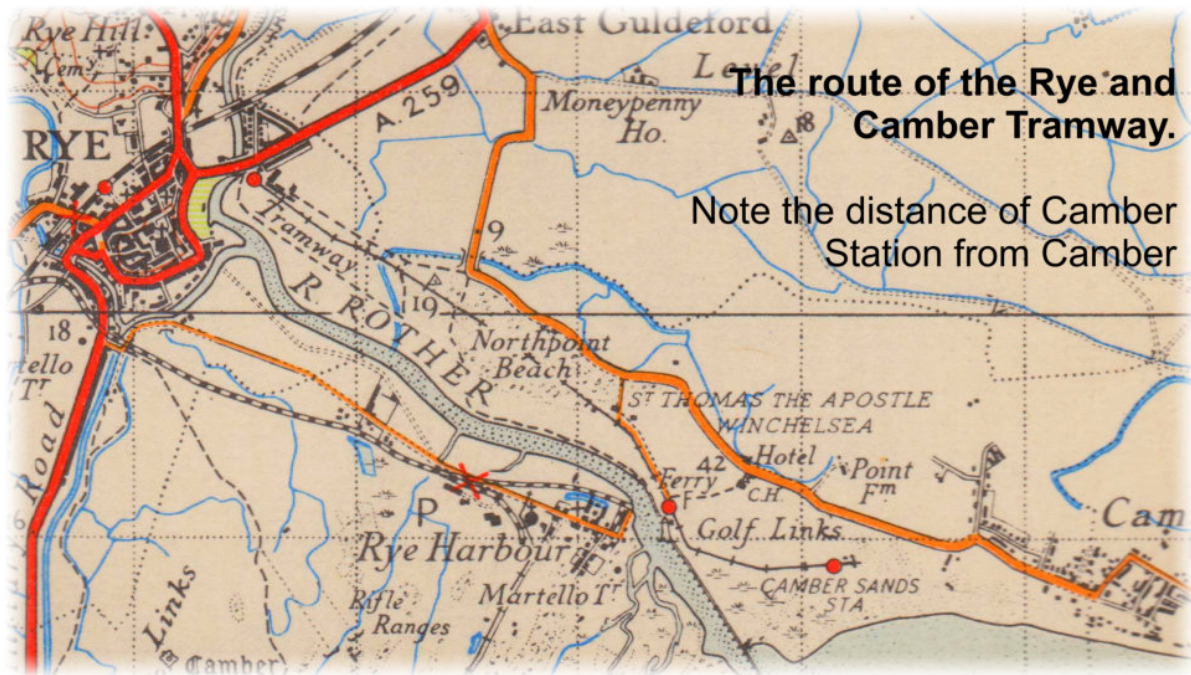


Figure 62: The Route of the Rye & Camber Railway East of the River Rother.

## Green Tourism

51.19 The Plan commits to sustainability and green issues. There has been a consideration of a range of areas including waste management, energy usage, procurement and biodiversity. We undertake sustainable practice where possible across all activities in our estate. We also encourage visitors to our monuments to use public transport where possible.

51.20 Activities range from details of local cycling routes, cycle hire, farmers markets, wildlife factsheets to details of local Green Tourism Business Scheme members.

51.21 Rye Harbour is a Nature Reserve adjacent to Rye Parish. There is wildlife, habitat, landscape and walks beside the sea, whatever the season.

The Nature Reserve lies within a large triangle of land extending south from Rye, along the River Rother, past Rye Harbour to the sea, westward to Winchelsea Beach and northwards along the River Brede. This triangle of land is largely designated as a Site of Special Scientific Interest (SSSI) because of the many unusual plants and animals that live here as well as the way the land has been built up by the sea over the last 500 years.

51.22 Shingle wildlife is specialised because of the harsh conditions that prevail, so there are many rare and endangered plants and animals to be found here. Large gravel pits were created by shingle extraction and these have become a valuable habitat for wetland wildlife. Most of the area also has the European wildlife designations of Special Protection Area (SPA) and Special Area of Conservation (SAC). In 2006 the SSSI was included in the new 9,000+ ha. site called the

## **Education**

51.23 The schools (covering age 2 to 19) in Rye are now governed by The Rye Academy Trust (RAT): Rye College, Rye Studio School and Rye Community Primary School. The last includes the Pugwash Nursery. Early years provision is made independently (privately) at the Ferry Road Centre and also at the Grove Lane facility (co-located with Rye Community Primary School).

## **Medical**

51.24 The Community is able to choose to access medical services in one of two places locally: the Ferry Road Surgery and the Kiln Road Medical Centre co-located with the Rye Memorial Hospital. The latter is in the Parish of Rye Foreign. Capacity and services should expand to cater for the increased population resulting from the implementation of this plan.

## **Sustainability**

51.25 The policies aim to contribute to sustainable development by:

- a. promoting safer communities.
- b. Improving access and connectivity
- c. promoting community participation in a diverse range of sporting, recreational and cultural activities.

- d. providing a wide range of facilities in Rye to reduce the need to travel.
- e. increasing the reasons for visitors to come to Rye and support local businesses.

## **Bibliography and References**

- Brent, 1973. C. Population in East Sussex 1540 to 1640.
- Clark, K. 1999. Rye A Short History
- Collard, J. 1978. A Maritime History of Rye
- Draper, G. 2009. Rye - A History of a Sussex Cinque Port
- Holloway, W. 1847. The History and Antiquities of the Antient Town and Port of Rye
- Martin, D and B. 2009. Rye Bebuilt
- Mayhew, G. 1987. Tudor Rye
- Monod, P.K. 2003. The Murder of Mr Grebell
- National Archives. 2010. Material accessed via <http://www.nationalarchives.gov.uk>
- Palmer, F. 2015. Rye Planning Archive (List Below as Palmer Archive)
- Vidler, 1971. L A. A New History of Rye

The [Localism Act \(2011\)](#) introduced several new rights and powers to allow local communities to shape new development, including the provision to prepare a 'Neighbourhood Plan' for their area. A neighbourhood plan can set out policies for the location of houses, shops, and offices, or set design standards for new development.

Relevant policies in the Rother DC Local Plan (2011-2028) have been adopted.

## **Local Development Scheme**

(LDS) which sets out a three-year work programme for the preparation and review of local planning policy in Rother District.

- [The Core Strategy](#) which sets out the Council's long-term spatial vision and policies to deliver that vision. It will identify broad locations for development where development will be accommodated but will not specify actual sites. It will also include strategically important development management policies.



- [The Development and Site Allocations Plan](#) which will allocate specific areas of land for development, review development boundaries, and will include more detailed development management policies.
- [Supplementary Planning Documents](#) (SPD), which elaborate upon a policy or proposal in the Local Plan. They are non- statutory documents. Current SPDs exist for Affordable Housing and North East Bexhill.
- [The Statement of Community Involvement](#) (SCI) which provides the protocols for public involvement in the preparation and subsequent review of policy documents and planning applications.
- [Annual Monitoring Report](#) which informs as to the progress on implementing the Local Development Scheme, and the extent to which the policies set out in the Local Plan are being achieved.
- [Housing Land Monitoring](#) which reviews the characteristics of the current housing market and identifies the extent to which existing plans fulfil the requirement to maintain a rolling supply of deliverable land.
- [Sustainability Appraisal](#) which evaluates the social, economic and environmental impacts of policies and strategies in a Local Plan to ensure that the policies and strategies are in accordance with Sustainable Development Objectives.
- [Background Evidence Studies](#) have been prepared on a number of different subjects in order to inform the new Local Plan. A full list of studies is set out.
- [Neighbourhood Plans](#) may be prepared by Town and/or Parish Councils to plan for housing and other development needs in that locality. It is an alternative to working with the District Council on [Site Allocations](#).
- [Community Infrastructure Levy \(CIL\)](#) is a new tariff-based approach to help fund infrastructure. The Council is looking to implement a CIL Charging Schedule by Spring 2015. Viability assessments to underpin any potential CIL Charging Schedule are underway. Further details can be found [here](#).
- [Affordable Housing SPD](#) The Affordable Housing SPD provides supporting guidance on the application of the affordable housing policies (Policies HG1 and HG2) of the Rother District Local Plan.
- [Draft Rock Channel area Rye SPD](#) Policy RY3 of the Rother District Local Plan allocates an area for mixed-use housing and employment uses and open space in the Rock Channel area in Rye. A draft development brief provides further guidance on the form and layout of development and the mix of uses.

- [Car Parking Standards](#) The Council has approved the County Council's updated car parking standards guidance for use in assessing parking provision in new developments.

## Background Evidence

Rother DC's Local Plan (2011-2028), formerly known as the Local Development Framework, is based on thorough investigations of the needs, opportunities and constraints within the district. Studies have been undertaken on the key aspects of the social, economic and environmental characteristics of the area. A number of background papers have been prepared.

### The Palmer Archive:

1967: Town Map Rye – Written Analysis by ESCC  
1967: Rye Town Map – Summary Report  
1967: Written Statement  
1975: The Rye Town Scheme  
1975: Landgate Bridge – Major Works  
1987: A259 Trunk Road Improvement ( 8 options; 1 selected route)  
1992 - 1996: Rye Bypass proposals – endorsement to withdrawal  
1993: Rye Town Initiative  
1995: Strand Quay Improvements  
1996: Environmental Improvements to Strand Quay  
2000: Rye Harbour Marina  
2003: Rye Steps Forward – Proposed Measures for Rye  
2003: Local Area Transport Strategy  
2006: Proposed Pedestrianisation of Strand Car Park  
2007: Rock Channel Area – Rye Development Brief  
Date Unclear: Remedy for Rye

The [Equalities Impact Assessment](#) details the results of the Equality Impact Assessment (EqIA) of the Rother District Council Proposed Submission Core Strategy. The main purpose of the EqIA is to assess whether the Proposed Submission Core Strategy affects different groups of people in different ways. It considers the likely impact on these different groups and how the needs of such

groups have been taken into account in relation to the development of the Core Strategy and the policies contained within it.

An updated [Equalities Impact Assessment](#) for the Proposed Submission Core Strategy incorporating Focused Amendments was published in August 2012.

A '[Duty to Co-operate statement](#)', which sets out how Rother DC has complied with the duty to co-operate under the Localism Act, 2011 in the formulation of the Core Strategy.

Following publication of the NPPF, a detailed '[Proposed Submission Core Strategy - Assessment of compliance with the NPPF](#)' which indicates the extent to which the NPPF policies are complied with by the Core Strategy.

A '[Legal Compliance Self-Assessment](#)' has been undertaken by the Council to check, and confirm, that its Core Strategy has been prepared in accordance with the relevant legislative requirements and is legally "sound" to submit. As such, it supports the submission of the Council's 'Proposed Submission Core Strategy (incorporating Focused Amendments)' in July 2012.

A '[Soundness Self-Assessment](#)' has been undertaken by the Council to check, and confirm, that its Core Strategy is positively prepared, justified, effective and consistent with national policy in order for it to be judged "sound". As such, it supports the submission of the Council's 'Proposed Submission Core Strategy (incorporating Focused Amendments)' in July 2012.

## **Spatial Area Studies**

The [Hastings Fringes background paper](#) provides the evidence base supporting the Hastings Fringes chapter of the Proposed Submission Core Strategy. The paper focuses on urban fringe management of the Hastings Fringe area, improving accessibility in the Hastings and Bexhill area, and looking at sustainable urban expansion that supports the shared vision for Hastings and Bexhill and is consistent with traffic and environmental constraints.

The [Rother in Profile Document](#) identifies the main spatial characteristics of the District, and sets the scene for the consideration of future development and change in Rother.

The [Rye and Rye Harbour Study](#) forms part of the evidence base to inform Rother District Council's Core Strategy Development Plan Document. The paper focuses on Rye and Rye Harbour village and contributed towards refining the 'place-shaping' framework for one of Rother's most distinctive settlements.

A [Rural Settlements Study](#) aims to contribute towards the 'Place-Shaping' of individual villages. It has helped inform the Core Strategy by defining villages in terms of their service role, and need/suitability for development.

The [Urban Options Background Paper](#), which elaborates on the context for the strategies for Bexhill, Battle and Rye, and on their respective strategic options for future development and change.

## **Homes and Housing**

The [Affordable Housing background paper](#) details the evidence base which supports the affordable housing policies in the Local Housing Needs chapter of the Proposed Submission Core Strategy. It looks at thresholds, percentages and tenures of affordable housing, along with the methodology for affordable housing targets.

The [Gypsy, Traveller and Travelling Showpeople background paper](#) details the evidence base and methodology for the provision of sites for Gypsies, Travellers and Travelling Showpeople. It outlines the appropriate level of provision for Gypsy and Traveller pitches within the District based on local need.

The [Hastings and Rother Housing Market Assessment 2006](#) was undertaken jointly with Hastings Borough Council. It established a strategic vision of housing supply and demand over the next 10 years.

The [Hastings and Rother Strategic Housing Market Assessment Update 2009/10](#) was undertaken jointly with Hastings Borough Council. The Update addresses the gaps in the original 2006 HMA report to ensure it complies with the Communities and Local Government Guidance (2007) and considers the effects of the housing market downturn.

The [Housing Needs Study 2005](#) was carried out by David Couttie Associates (DCA) on behalf of the Council. The purpose of the study was to examine the housing requirements needs, aspirations and demands for the communities and household of the District.

The [Housing Strategy 2007 to 2012](#) is produced by the Council's Housing Division. It includes valuable research into the housing needs of Rother's residents.


There are a number of relevant [Housing studies](#) on issues such as affordable housing, homelessness and gypsies and travellers.

The [Overall Housing Provision in Rother District background paper](#) reviews the national policy guidance, as well as the basis of, and assumptions behind, the housing provisions for Rother in the South East Plan. It considers their currency in terms of providing a strategic direction for the wider area as well as for Rother. The main body of the Paper concerns itself with determining the appropriate level of housing growth by looking in turn at the various factors that need to be carefully balanced.

The [Rother District Affordable Housing Viability Assessment 2010](#) tests the District Council's proposed affordable housing policies and ensures that they are consistent with securing the delivery of new houses within Rother.

The [Strategic Housing Land Availability Assessment](#) (SHLAA) 2013 identifies sites with housing potential, both those that accord with current planning policy and further ones that would require a change in policies if they are to be pursued.

Following publication of the NPPF, an '[Assessment of housing need in the Hastings and Rother HMA](#)' which reviews the relationship between housing growth proposed in the Core Strategy and housing need, drawing together information contained in existing documents (prepared jointly with Hastings Borough Council).


 [Updated Local Economic Forecasting Model \(LEFM\) Produced in 2010](#)  
[\[164kb\]](#)[Opens new window](#) have also been published.




A '[Housing Land Supply and Housing Trajectory at April 2012](#)' which indicates the anticipated delivery of housing proposed in the Core Strategy and the current position on the supply of deliverable sites.

 [Summary Appraisal of Sustainable Housing Growth Potential July 2013](#)  
[\[1Mb\]Opens new window](#)

 [Letter From Hastings & Rother Councils to Neighbouring Councils Regarding Duty to Co-Operate on Housing Provision July 2013](#) [183kb][Opens new window](#)

 [Hastings and Rother Strategic Housing Market Assessment Update: Housing Needs Assessment June 2013](#) [1Mb][Opens new window](#)  
[Strategic Housing Land Availability Assessment June 2013](#)

 [Rother Core Strategy Housing Numbers - Habitat Regulations Implications Analysis July 2013](#) [144kb][Opens new window](#)

 [Housing Land Supply and Trajectory as at April 2013](#) [456kb][Opens new window](#)

There are now imaginative and innovative house designs for flood risk areas. These include <http://www.rudi.net/node/18152>

## **Economic and Commercial**

A '[District-wide Shopping Assessment](#)' prepared by GL Hearn, is available. The purpose of this assessment is to inform and guide retail planning in the District.

The [Hastings and Rother Employment Strategy Review](#) (incorporating Employment Land Review) has been prepared jointly with Hastings Borough Council. It provides the evidence base for the development of spatial economic strategies in the Authorities' respective Local Plans. The [Hastings and Rother Employment Strategy Review Update](#) (incorporating Employment Land Review) has been prepared jointly with Hastings Borough Council. It updates the evidence base for the development of spatial economic strategies in the Authorities' respective LDFs.

An '[Employment Land Supply and Trajectory April 2012](#)' which indicates the anticipated delivery of employment land proposed in the Core Strategy and the current position on the supply of deliverable sites.

 [Review of Employment Land Requirements in Light of Proposed Revised Housing Targets July 2013 \[97kb\]](#)[Opens new window](#)

 [Rother Shopping Assessment Update Report 2013 \[2Mb\]](#)[Opens new window](#)


## Recreation and Leisure

An [Open Space, Sport and Recreation Audit and Assessment](#) has been completed with the assistance of PMP consultants and in accordance with national planning guidance (PPG17).

[Hastings and Rother - Leisure Facilities Strategy \(2009-2020\)](#) was prepared by Capita Symonds for Rother District Council and Hastings Borough Council. The final report, dated August 2009, has been adopted by the Councils.

## Environmental

The **Green Infrastructure Study** is a background evidence study for the Local Plan (2011-2028). Its purpose is to draw on relevant sources to identify spaces that contribute to green infrastructure in the district and to identify potential opportunities for future green infrastructure provision.

 [Green Infrastructure Study \[3Mb\]](#)[Opens new window](#)

[Habitat Regulations Assessment \(HRA\)](#) - The purpose of a HRA is to assess the impacts of a land-use plan, in combination with the effects of other plans and projects, against the conservation objectives of a European nature conservation site, also known as the Natura 2000 network; and to ascertain whether that plan would adversely affect the protection or integrity of such a site.

[Landscape Assessments](#) have been carried out for strategic development areas around Bexhill and the Hastings Fringes and for the Market Towns and Villages in order to assist consideration of the development strategy.

A '[Low Carbon and Renewable Potential Study](#)' has been prepared for the Council by Scott Wilson in association with Drivers Jonas and Thamesway Energy to help in the development of policies for a low-carbon future.

<https://www.gov.uk/government/policies/improving-the-energy-efficiency-of-buildings-and-using-planning-to-protect-the-environment/supporting-pages/code-for-sustainable-homes>

A **Strategic Flood Risk Assessment** has been prepared by the council, together with its consultants, Scott Wilson and in consultation with the Environment Agency.

**'Water, People, Places'** is a sustainable drainage systems (SuDS) guide developed for the South East 7 (SE7) authorities, which includes East Sussex County Council. This guidance outlines the process for integrating sustainable drainage systems (SuDS) into the master planning of large and small developments. This guidance should be used by developers and planners and other practitioners involved in the planning and design of the built environment in the South East of England.

**Defra and Environment Agency (2007).** *Management of flood embankments – a good practice review*, Technical Report FD2411/TR1. Environment Agency:

[http://sciencesearch.defra.gov.uk/Document.aspx?Document=FD2411\\_6509\\_TRP.pdf](http://sciencesearch.defra.gov.uk/Document.aspx?Document=FD2411_6509_TRP.pdf).


**Transport and Infrastructure** The 2013 study into traffic forecasts in UK:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/212474/road-transport-forecasts-2013.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/212474/road-transport-forecasts-2013.pdf)


The **Infrastructure Delivery Plan (IDP) (July 2012)** identifies key pieces of infrastructure needed to achieve the objectives and policies in the Core Strategy, and identifies broad locations where the infrastructure will be located. The IDP is a 'live' document and will be periodically reviewed and updated as infrastructure providers assess their investment plans. The previous Infrastructure Delivery Plan was completed in August 2011 and can be found [here](#).

A **'Transport Capacity Assessment'** prepared by East Sussex County Council, which draws together the conclusions of two transport assessments affecting development in Bexhill and Hastings undertaken by Mott MacDonald, namely a **LDF Sensitivity Assessment - March 2013** and a **Glyne Gap Development Assessment**.

 [Demand Forecasting Report March 2013 \[437kb\]](#)[Opens new window](#)

 [Infrastructure Assessments and Recommendations March 2013 \[2Mb\]](#)[Opens new window](#)

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