



Rother District Council

Local Development Framework

Core Strategy:

Urban Options Background Paper

November 2008



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1 INTRODUCTION

- 1.1 The purpose of this paper is to present the information and consideration that has been drawn together in preparing the urban spatial strategies for each of the towns in the District. There are three further chapters in this Background Paper: Bexhill and the Hastings Fringes; Battle; and Rye and Rye Harbour. The structure for each chapter is outlined below.
- 1.2 Firstly for each town the context is set including a list of all reference documents that have been reviewed, which provide valuable information regarding a variety of social, economic and environmental aspects of the towns. This information can be used to provide a proxy for the 'health' of the towns and is important in establishing their strengths and weaknesses. From this evidence, key issues are identified, which provide a basis for developing and assessing options aimed at addressing the key issues.
- 1.3 Further context is provided by way of an overview of the current policy position for each town and a short history of the development of options, embracing the vital public consultation feedback on 'Issues and Options' gathered in 2006.
- 1.4 The spatial strategy options are then presented with detail of their characteristics, commentary on their emphases, strengths and weaknesses and how they performed in the Sustainability Appraisal. The purpose of Sustainability Appraisal is to help planning authorities contribute to achieving sustainable development in preparing their plans. This appraisal process helps to inform the choice of preferred strategy option.
- 1.5 Lastly each chapter focuses on the development of the strategy options including the broad locational options for development associated with taking the chosen option forward. Each potential location for development is then assessed against a range of environmental, accessibility and infrastructure (including employment) factors and conclusions drawn.
- 1.6 The separate Initial Sustainability Appraisal Report contains further information and detail of the appraisal of all the options and is available via the Council website alongside a suite of Background papers which provide further context to the Core Strategy Consultation on Strategy Directions.
- 1.7 A separate background paper – the Draft Rural Settlements Study – considers the options for development in the villages.

2 BEXHILL AND THE HASTINGS FRINGES

CONTEXT

Key references

- 2.1 In identifying and appraising strategic options for development and change at Bexhill, the following documents have been reviewed:

Table 1 Documents Reviewed for Bexhill

Rother District Local Plan	Draft 'Masterplan' for Hastings and Bexhill
Core Strategy Issues and Options document	Bexhill Town Centre Conservation Area Appraisal
North East Bexhill Draft SPD and related reports	Old Town Bexhill Conservation Area Appraisal
Hastings and Bexhill LATS	Rother Shopping Assessment, 2008
PPG17 Audit and Assessment	Primary Care Development Plan
Bexhill High School BSF Bid Documents	Prosperity for Hastings and Bexhill
Bexhill Hastings Link Road application and supporting documents	Draft Development Strategy and Business Plan for the Pebsham Countryside Park
Shoreline Management Plan	Bexhill Town Centre: A Framework for Regeneration
Cuckmere and Sussex Havens CFMP	Bexhill Community Partnership CDP reports
Task Force Fire Point Plan and Business Plan	Bexhill Opportunities

Strengths, weaknesses

Strengths:

- Seaside location
- Attractive urban area
- Low crime
- Range of community organisations
- New College
- Independent retailers
- Generally good housing stock
- Stable Population
- Extensive seafront
- De La Warr Pavilion
- Edwardian town centre

Weaknesses:

- Low economically active pop
- Service demands of elderly
- Limited jobs available
- Lack of investment in infrastructure
- Poor accessibility
- Weak commercial property market
- Town centre overshadowed by Hastings and Eastbourne
- High School
- Areas of deprivation
- Loss of young people

- 2.2 In summary, Bexhill is a medium-sized seaside town, which has acquired a role as a retirement location. However, there is also evidence of a gradual economic decline and particular parts of the town have recognised high levels of deprivation.
- 2.3 Economic performance in large part reflects its poor communications and relationship with adjacent Hastings, which is the most deprived urban area in the South East.

Key issues

2.4 The main issues to address are:

- How to increase household incomes and attractiveness to younger people, whilst continuing to meet needs of established population, including for amenities and community coherence
- How to attract commercial investment given locational disadvantages
- How to stimulate improved infrastructure
- How to increase opportunities for disadvantaged groups/areas
- How to provide for further growth to meet community needs and aspirations

Current policy position

- 2.5 The adopted Local Plan sets out, at Chapter 10, the current development strategy and policy areas for Bexhill. While the Plan covers the period up to 2011, the allocations for major urban extension to the north east of the town are recognised as having a longer timeframe for full development. Similarly, the implementation of the Pebsham Countryside Park is envisaged as straddling the Plan period.
- 2.6 The Local Plan's strategy for Bexhill is largely oriented towards fostering a combination of residential and business growth at a rate commensurate with maintaining the town's character and amenities and improving accessibility. Particular regard is had to (sensitively) regenerating the town centre.
- 2.7 Since adoption, there has been progress in refining the major growth areas at North East Bexhill via a SPD although delays in the Link Road application have deferred active developer interest. Nevertheless, the Link Road has secured the necessary funding and determination of the planning application is imminent. There is greatest development engagement in the Policy BX2, adjacent to Pebsham, which the Local Plan foresaw as the first area to be built.
- 2.8 Further investigations to achieve the planned town centre redevelopment have not demonstrated a strong economic case and this is being reviewed both through the Retail Study and in discussions with key interests.
- 2.9 The County Council has secured funding for the High School relocation, which will see the existing site freed for mixed development. It intends to develop a skills centre on part of the site. There is developer interest in the Galley Hill Depot site.

Strategy Options

- 2.10 The Issues and Options consultation document put forward three options that relate to the future role of the town, and their respective implications for the need for development and change. These were:

Option 1 – Maintain Bexhill's role:

This looks to retain the town's current function and its relationship with Hastings.

Option 2: - Expansion of Bexhill's role

This proposes expansion of the town's function, making it a stronger centre for jobs and services, with a clear independent identity and re-balanced demographic profile.

Option 3 – Coordinated development at Bexhill and on the edge of Hastings

Rather than focus on Bexhill simply in terms of its own urban needs and potentials, this proposes taking a holistic view of the needs and opportunities of Bexhill and Hastings, especially in terms of their combined potential for regeneration. Improved connectivity between the towns is key, with development well related to both.

Development options

- 2.11 Bexhill is identified in the South East Plan as one of only two parts of the 'Sussex Coast' that is not heavily constrained by national environmental designations. It therefore directs a proportion of the sub-region's growth towards the town. Planning for a 20-year period up to 2026 will inevitably require additional development allocations. If these involve significant land releases, they should be identified in the Core Strategy.
- 2.12 PPS3 requires that strategic sites, or broad locations for development, that are critical to the delivery of the housing strategy be identified in the Core Strategy.
- 2.13 The amount of land required for development, at least as regards housing, is being set by the South East Plan. The draft South East Plan provides for 280 dwellings/year in Rother, of which 200 dwellings/year should be in the coastal belt (principally Bexhill). This level of development has been supported by the independent Panel appointed to 'examine' the plan.
- 2.14 The figures derive from sub-regional work undertaken by East Sussex County Council (and supported by the District/Borough Councils) in 2005 under the title 'New Homes for East Sussex 2006-2026'. The relevant paragraphs state:-

In addition to the existing supply of land for housing, our proposal for the Rother part of the Sussex Coast sub-region (which includes the towns of Bexhill and Rye) implies a requirement for an additional strategic allocation of around 1,000 new homes.

Our assessment suggests that this could be provided at north and/or west Bexhill. There might also be some limited potential on the western fringe of Hastings together with employment development as part of a mixed scheme, but this would be dependent upon improving local access and a new railway station at Wilting to serve it.

The new strategic allocation would be required for development in the latter part of the plan period. It would be in addition to, and follow on from, the completion of the existing allocation of 1,100 homes at north-east Bexhill that is currently being brought forward in the district-wide Local Plan. This will not now be completed by 2011 as originally envisaged by the County Structure Plan because of delays in delivering the transport improvements required to provide appropriate access and help relieve severe congestion and air quality issues at Glyne Gap.

- 2.15 Both the new and the existing strategic housing allocations around the town are dependent on the development of the new Bexhill-Hastings Link Road and other local transport improvements.

Public consultation feedback on ‘Issues and Options’

- 2.16 The Issues and Options consultation suggested a broadening out of the strategy for Bexhill to more fully embrace healthcare, leisure and cultural development, education and safety aspects.
- 2.17 In terms of future growth, it highlighted that the scale and location of further development should reflect the conclusion of the critical consideration of the town's role; specifically, whether it maintains its current role, seeks to be a more self-contained independent town, or take a more co-ordinated approach to change with Hastings. In line with this last approach, views on the future use of land on the Hastings fringes were also invited.

Responses: Strategy for Bexhill

- Attention to physical community infrastructure, especially a range of recreation facilities was highlighted. However, there is a mixed reaction to cultural development with a DLW focus. A stronger tourism focus is supported. There is also community support for “eco-friendly” developments (BALI).
- It is questioned whether there should be a broader strategy for Bexhill, Hastings and Battle, also taking account of the related villages.
- Affordable housing is vital and funding needed.
- A new vocational skills centre is proposed (ESCC).

Responses: Hastings fringes

- There are important habitats that should be conserved (NE). This includes ancient woodlands (FC).

Responses to growth scenarios

- Combe Haven is recognised as a natural buffer between the towns and its flood risk and bio-diversity issues may suggest that Bexhill maintain its current role (EA). Conversely, greater linkage with Hastings appears “common sense”, with growth needed to reverse economic decline (RVA).
- While there is some agreement on the principle of further growth, a pragmatic view is that this is conditional upon road and rail improvements.
- A more self-sufficient town is regarded as advantageous in terms of improving its retail, commercial and recreational sectors as well as maintaining what is a clear independent identity from Hastings (Rother Homes). It is suggested that this may still be achieved in concert with a regenerated Hastings. Development may be phased in line with a holistic long-term strategy.
- Co-ordinated growth with Hastings is regarded as offering greatest potential for infrastructure and improved competitiveness.
- There are mixed views about development in the Wilting Farm area. There is support from HBC for Option 3.

- Others argue for a further evaluation of options and point to adverse impacts on the setting and facilities at Crowhurst (CPC) as well as on the Countryside Park (ESCC). Several comments received on the vital role of strategic gaps.
- Development north and west of Bexhill would need to ensure that both highway capacity and drainage capacity (in the Wallers Haven) were available (WDC). Development south of the A259 should also be considered. Also, consideration should be given to several smaller allocations, although others argue this could erode local character. There is a general acknowledgement of urban growth (at Bexhill and Hastings) in preference to rural growth, although with reluctance in some quarters.

SPATIAL STRATEGY OPTIONS

Option characteristics

- 2.18 In assessing the strategy options for the future of Bexhill for the purposes of a 'Sustainability Appraisal', the following distinctive attributes and merits were identified:

Table 2 Options for Bexhill

<i>Central theme</i>	<i>Scale of growth</i>	<i>Main areas of change</i>	<i>Strategy emphases</i>	<i>Strengths/ weaknesses</i>
Maintain Bexhill's role	Low - medium	North-east and north-west Bexhill	Efficient urban area, including town centre; Regeneration of parts of town, its facilities and environment	<u>Strengths:</u> Retains town character; Low risk/ low interventions; <u>Weaknesses:</u> Limited economic/ demographic change
Expand Bexhill's role	Large	North and west Bexhill Bexhill town centre	Strong identity; Growth areas; New transport infrastructure; Retail growth; New facilities; Major public realm projects;	<u>Strengths:</u> Supports demographic change; Meets growth agenda; <u>Weaknesses:</u> Relies on investment in roads, etc; High scale of job creation
Coordinate approach to the Bexhill/ Hastings area	Medium - large	North Bexhill and west Hastings; Pebsham Park; Bulverhythe; Ravenside	A shared catchment; 'Green heart'; Cross-boundary infrastructure, including Wilting Station and bus corridors	<u>Strengths:</u> Efficiencies in delivering facilities Joint "voice" <u>Weaknesses:</u> Weakens identity of town

Commentary

- 2.19 Consultation responses highlighted the need for attention to community development and better physical infrastructure, both transport and "green" infrastructure.
- 2.20 There were mixed views on greater linkage with Hastings. On the one hand it is seen as making economic sense, but also as a threat to the identity of the town.
- 2.21 A more self-sufficient town would be advantageous in terms of improving its retail, commercial and recreational sectors, as well as maintaining what is a clear

independent identity from Hastings. It is suggested that this may still be achieved in concert with a regenerated Hastings.

2.22 However, there are some clear local environmental priorities, notably retaining strategic gaps and establishing the Countryside Park.

2.23 Consideration of these options against Sustainability Objectives has shown:

- Option 1 should have positive effects for housing, health, social inclusion, accessibility and protecting and enhancing the character of the town. As the strategic growth areas are all greenfield land, the option would be likely to have adverse effects on biodiversity and the efficient use of land. The new road associated with this option may in the short to medium term help relieve congestion; in the long term there are likely to be negative effects on air pollution and it does not reduce car usage. There would be less overall scope for economic turnaround.
- Option 2 presents significant opportunities for providing affordable homes, improving health, deprivation, accessibility, educational attainment and for meeting the regional aspiration for economic growth in the Sussex Coast Sub region. As might be expected with a higher growth option there is a likelihood of adverse effects against the 'environmental' SA Objectives including efficiency in land use, reducing greenhouse gas emissions, improving air quality, conserving and enhancing biodiversity and reducing waste generation. Mitigation proposals could lessen the significance of effects but there will need to be some acceptance that there are negative aspects to higher growth aspirations.
- Option 3 has more uncertainty surrounding the option's ability to address deprivation issues in Bexhill and the need to raise educational attainment. The option could be considered to weaken the identity of Bexhill as the focus tends to be Hastings-led and the major improvements would be seen in Hastings and on the east of Bexhill – so the option doesn't necessarily consider the holistic needs of Bexhill as its own entity. Likely to result in less scope for Town Centre improvements. Similar issues to options 1 and 2 surrounding efficiency in land use, conserving biodiversity and generation of waste.

Conclusions

2.24 The town, and its built environment, would benefit from additional investment, especially in the town centre.

2.25 Locational disadvantage constrains wider business investment and activity. Stimulating the market and attracting new investment, and improving infrastructure to support it, is a real challenge. These factors also heavily question the ability of the town to support large-scale sustainable growth.

2.26 Therefore, the most appropriate strategy for Bexhill should be one that emphasises its independent but complementary function vis-à-vis Hastings, as well as its own priorities for future well-being, notably to become more attractive to families and young people.

DEVELOPMENT STRATEGY OPTIONS

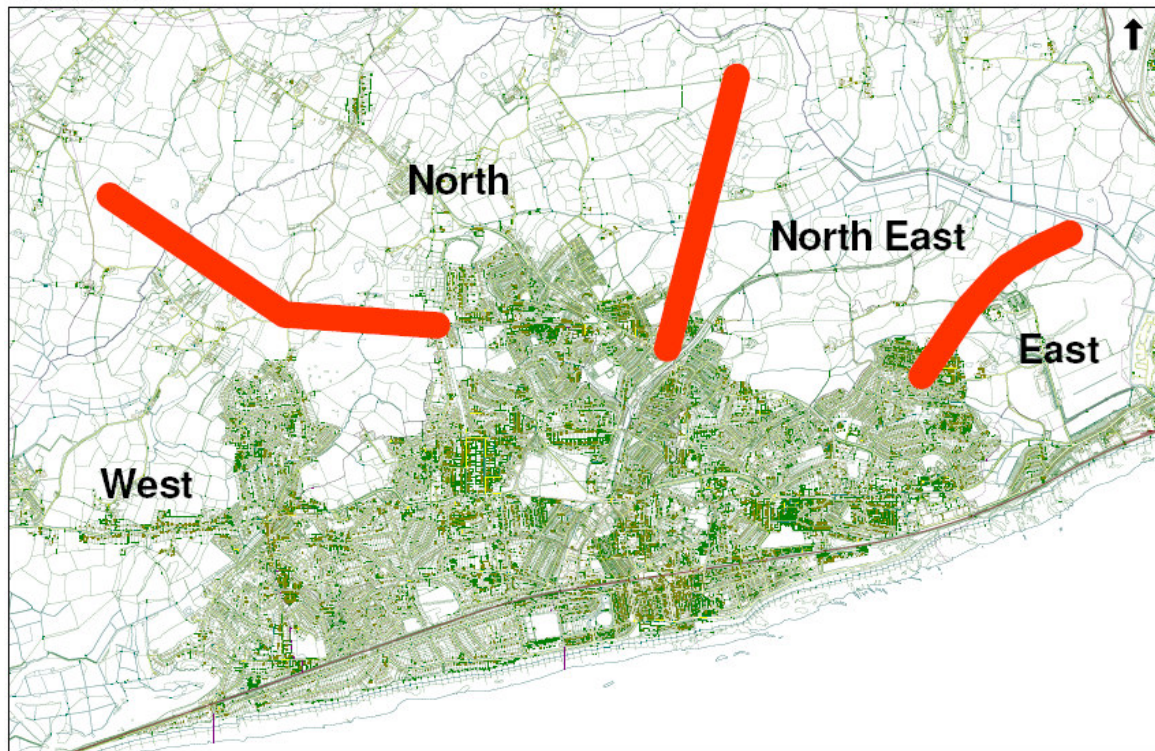
Existing proposals

- 2.27 The adopted Local Plan sets out, at Chapter 10, the current development strategy and policy areas for Bexhill. While the Plan covers the period up to 2011, the allocations for major urban extension to the north east of the town are recognised as having a longer timeframe for full development. Similarly, the implementation of the Pebsham Countryside Park is envisaged as straddling the Plan period.
- 2.28 The Local Plan's strategy for Bexhill is largely oriented towards fostering a combination of residential and business growth at a rate commensurate with maintaining the town's character and amenities and improving accessibility. Particular regard is had to (sensitively) regenerating the town centre.
- 2.29 Since adoption, there has been progress in refining the major growth areas at North East Bexhill via a SPD although delays in the Link Road application have deterred active developer interest. There is greatest development engagement in the Policy BX2, adjacent to Pebsham, which the Local Plan foresees as the first area to be built.
- 2.30 The current development strategy already provides for a major urban extension to the north east of the town (including some 1,300 dwellings and 50,000sq.m. of business floorspace), although delays in securing permission for the Link Road on which it relies mean that development is deferred.
- 2.31 Development to the north east of the town is still regarded as the most appropriate, and more detailed planning guidance is being drawn up. As previous examinations have concluded, it is well related to the urban area, accessible to the town centre and existing employment areas. It also dovetails with the planned Link Road and helps improve access to it from the north of the town.

Further broad locational options for development

- 2.32 As a first stage, a basic 'sieve analysis' has been undertaken to provide 'areas of search' in the each of the sectors referred to in the draft SE Plan – west Bexhill, north Bexhill and west Hastings. The latter includes unconstrained* land not directly related to the Wilting area but also land mostly in Hastings but straddling the administrative boundary. (* the constraints applied are national environmental designations – AONB, SSSI, flood zone 3).
- 2.33 Strategic countryside gaps and SNCIs have also been reviewed (although not automatically taken to be absolute constraints).
- 2.34 The resultant 'areas of search' are shown on Figure 1. A threshold area of 50 hectares has been applied, sufficient for a mixed-use development of at least 500 dwellings and associated employment, open space and services.
- 2.35 It is not necessarily presumed that all of these areas may be developed, but they provide a basis for more detailed assessment.
- 2.36 It is noted that there is also a number of smaller, more discreet areas on the fringes of Bexhill (not shown on Figure 1) that will require examination.

Figure 1
Bexhill: Area of Search



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North of Bexhill:

- 2.37 This relates to land stretching north westwards from the proposed North East Bexhill development towards the A269 Ninfield Road. Key considerations are that there will be good road access, with both the A269 and the proposed 'country avenue' linking to the existing built-up area, both being public transport corridors. However, large scale development would impact on links to the south and on the A259. It may also threaten to absorb The Thorne and Lunsford Cross into the built-up area.
- 2.38 Development west of the A259 would assist in providing the infrastructure regarded as essential to the planned landfill use of the Ibstock site without impacting on Sidley. Also, access to the existing major employment allocation is improved from the west and south. It is rolling farmland, divided by several areas of ancient woodland.

West of Bexhill:

- 2.39 This includes land extending westwards from Little Common running along Barnhorn Road (A259). The potential area encompasses both sides of Barnhorn Road and is defined clearly by the Flood Zone 3 which surrounds 3 sides of the potential development and Little Common residential area backs onto the east forms the final boundary line. The A259 is the main road that serves the development. It may be extended northwards, although at present there is no main access road to the development area as it stands and it is served only by the Whydown Road from the west and Sandhurst Lane from the east.
- 2.40 The key issue for this whole area is the capacity of the A259. It is clear that to accommodate any scale of development would necessitate the construction of a new road linking the A259 across the A269 to the Link Road. This may be a development road in large part, but not entirely because of the need to maintain open land,

floodplains and woodland. Development may increase run-off to the Ramsar Site and impact on its water management regime.

West of Hastings:

- 2.41 The areas of significant development potential that do not encroach into the AONB on the edge of Hastings are land south of the Battle Road, and in the area of Upper and Lower Wilting Farms.
- 2.42 Hastings Borough Council has proposed the allocation of land just within the Borough boundary which runs to the south of Battle Road for some 1,000 houses and associated business space. Land fronting the road is within Rother district and forms part of the Strategic Gap between Hastings and Battle, and is prominent open ground rising westwards. Land to the rear slopes south-eastwards towards from the ridge towards the Marline valley.
- 2.43 Hastings Borough Council also supports development in the Wilting area. Development in this area is seen as supporting economic regeneration of the town, particularly if a new station were built. However, land in this area is visually exposed and also limited by the flood risk area. It would also erode a Countryside Gap, between Hastings and Bexhill/Crowhurst, as well as involving the loss of part of the Countryside Park.
- 2.44 Large scale development in either area would be dependent on the Link Road and Baldslow Link. Both areas are, despite their proximity, poorly linked to existing urban area. Wilting, because of its potentially substantial landscape impact, would become more sustainable if a new railway station, which is currently subject to a feasibility study, were forthcoming.
- 2.45 A summary of the appraisal of each of these areas of search is set out below. Table 3 presents the respective areas in terms of environmental and other designations that bear upon them, together with descriptions of their physical landform and access potentials. Table 4 assesses the areas against the locational criteria contained in the Consultation on Strategy Directions document.
- 2.46 It is noted that while consideration must also be given to land to the east of Bexhill, the importance of retaining the remaining open gap between Bexhill and Hastings, reinforced by the countryside park designation, means that there are fundamental strategic constraints on any significant development in that area.

Table 3 Characteristics of the main areas of search around Bexhill

North of Bexhill	West of Bexhill	North West of Hastings	Upper Wilting Farm
<u>Environmental designations:</u> AONB is some distance to the north but is visible from higher ground. A Flood Zone overlays the Combe Haven SSSI to the north east. Several woods are SNCIs, including Cole Wood.	<u>Environmental designations:</u> The Pevensey Levels, which is Flood Zone 3, a SSSI and Ramsar site, limits westward growth. There are SNCIs and an SSSI in the High Woods area.	<u>Environmental designations:</u> The AONB quite tightly surrounds the North West edge of Hastings. Marline Wood in Hastings is an area of SSSI. Beauport Park is classed as a SNCI.	<u>Environmental designations:</u> The Combe haven SSSI/ floodplain limit southern and western extents of development, the southern edge of the AONB is just to the north.
<u>Other designations:</u> To the east is the Strategic Gap, which is overlain	<u>Other designations:</u> No Strategic gaps; Broad Oak park	<u>Other designations:</u> Strategic Gap to south of Battle Road	<u>Other designations:</u> The whole area lies within the Strategic

and extended westwards along the Combe Valley by the Countryside Park. Several areas of ancient woodland.	and golf course highlighted in PPG17 audit.	covers whole area in Rother up to the Hastings boundary.	Gap.
<u>Topography and landscape:</u> Rolling, well wooded countryside around the upper Combe valley.	<u>Topography and landscape:</u> Patchwork of small fields divided by tree-lined hedgerows, falling away to marshland.	<u>Topography and landscape:</u> Small scale fields, mostly under grass, divided by small woods. Commercially managed woodland of Beauport Park to north. Land slopes southwards from ridge toward Marline valley.	<u>Topography and landscape:</u> Farmland on elevated position above the Combe Haven.
<u>Access:</u> The main road access is by the A269 Ninfield Road but may also connect to the 'country avenue' around the NE Bexhill allocation north of Sidley.	<u>Access:</u> There is direct access to the A259 trunk road. Further north, access is only via narrow lanes. Pear Tree Lane off the A269 links to west Bexhill. There is a station at Cooden.	<u>Access:</u> The main roads which serve North West Hastings are the B2159 and A2100. Direct access to Queensway would be across the Marline valley.	<u>Access:</u> The area is directly served by Crowhurst Road. Future access may be via Queensway and the Link Road. It is astride the London line and a new station may be possible.

Table 4 Assessment of areas of search around Bexhill

	North of Bexhill	West of Bexhill	North West of Hastings	Upper Wilting Farm
<i>Accessibility and linkages to jobs, shops and services by non car modes</i>	Would be readily accessible to Sidley, new business areas, and wider area if new road were a bus/cycle route.	Most distant from town centre and new business areas, but on main E-W road and rail corridor.	Poor access currently to local services although potential if new facilities as part of larger scheme and improved bus frequency.	Poor access currently to local services although potential if new station and bus services along Link Road.
<i>Contribution to 'building communities' (retain/improve services; mixed uses)</i>	Could dovetail with allocated development to north-east of Bexhill; also provide traffic relief to Sidley.	May support little Common district centre, job opportunities to west of town and broader balance of housing.	May contribute to making a larger development in Hastings more able to support new services, otherwise would be isolated.	Similar to North West Hastings, but better location for businesses, and a railway station should reduce car journeys.
<i>Landscape and environment, including bio-diversity and heritage</i>	Capacity for development south of high ground and Lunsford Cross to north. Ancient woodland and stream habitats may be retained.	More potential for development in east of area, although attractive landscape. Most potential for impact on Ramsar site	Some development potential, more acceptable if proposed development in Hastings occurs.	Relatively high landscape impacts due to exposed siting. Some potential straddling Borough boundary in south-east.

<i>Physical and infrastructure constraints, incl. flood risk, access</i>	New road to link to A269 needed, but potential development road. Sloping, valley-side sites; need to limit run-off to Haven.	Would need new road around town for other than small scale development. Moderate Flood Zone 2 impacts, being along stream courses	Readily accessible and no known physical constraints, other than reliance on Baldslow Improvement for larger scheme.	New railway station, under investigation. Need to very carefully manage run-off; also dependent on Baldslow Improvement.
<i>Resource efficiency potential, incl. SUDS, wind/solar, brownfield, low value land</i>	East-west orientation; may include elevated ground. Greenfield farmland	Southern areas quite exposed. All Greenfield land. Mainly agricultural use.	Greenfield land, although not all farmed. More RE potential if adjacent area developed.	Farmland. Parts exposed to south-west. Unlikely to be SUDS potential close to Haven.
<i>Commercial potential, including ownership pattern</i>	Understood to be few principal landowners. Not presently promoted.	Landowner interest in large areas; relatively high land and property values.	Landowner interest. Fringe urban location attractive.	Mainly public landownership.

Conclusion

- 2.47 In terms of future growth, the Issues and Options document highlighted that the scale and location of further development should reflect the conclusion of the critical consideration of the town's role; specifically, whether it maintains its current role, seeks to be a more self-contained independent town, or take a more co-ordinated approach to change with Hastings.
- 2.48 While more detailed work is needed in order to determine land allocations, especially in relation to traffic impacts, landscape, flood risk and rail potential, it is concluded that the most appropriate broad location for medium/longer term strategic growth, essentially following on from the allocated area north-east of Bexhill (which the recent Local Plan inquiry process confirmed as the most sustainable location), is the extension of that development area westwards, in association with an extension of the 'country avenue' from the Link Road to A269.

3 BATTLE

CONTEXT

- 3.1 In identifying and appraising strategic options for development and change at Battle, the following documents have been reviewed:

Table 5 Documents Reviewed for Battle

Rother District Local Plan 2006	Cuckmere and Sussex Havens CFMP
East Sussex and Brighton & Hove Structure Plan 1999	Employment Land Review
East Sussex and Brighton & Hove Minerals Local Plan 1999	Strategic Flood Risk Assessment
East Sussex and Brighton & Hove Waste Local Plan	Rural Settlements Strategy
East Sussex Local Transport Plan March 2006	Retail Assessment
Battle Local Area Transport Strategy	Battle Partnership Strategic Plan 2002 – 2112
East Sussex Landscape Character Assessment	Public Local Inquiry – Core Proof 2 – Development Strategy
The High Weald – Exploring the landscape of the AONB (C.C.) 1994	PPG17 – Open Space, Sport and Recreation – Audit and Assessment – November 2007
Rother in Profile 2006	The High Weald AONB Management Plan 2004 (20 year strategy)
Rother Local Development Framework Issues and Options 2006	Battle Conservation Area Appraisal
Rother Culture and Leisure Strategy 2006 – 2011	Primary Care Development Plan (Hastings & Rother)
South East Plan (Rest of Rural Rother)	Battle Partnership – Strategic Plan 2002 – 2012
Rother and Romney CFMP	Battle Local Action Plan – April 2007 (Battle Town Council)

Strengths and Weaknesses

Strengths

- High quality historic built environment
- High quality landscape setting
- Important archaeology
- Good pedestrian access
- Good range of community facilities
- Railway station
- Thriving tourist economy
- Relatively high household income

Weaknesses

- Traffic congestion
- Lack of car parking
- Poor cycle access
- Inadequate primary school provision
- Low retention of food shopping trips
- Weak office market
- Pattern of development

- 3.2 In summary, the Battlefield, the Abbey and the historic town centre fuels a strong tourist industry, with both economic benefits and consequent pressures on car parking and rising cross-town congestion issues. Being situated astride one of the principal High Weald east-west ridges, the town has grown up in a linear fashion. Development has extended over time along this ridge and the pattern of development, having the appearance of a dumbbell when viewed in plan, means that movement around and across the town is channelled through the centre.
- 3.3 As well as local and visitor traffic, there is also through traffic on the cross-country A271 and the north-south A2100. Pedestrian links through and around the town are relatively good; however suitable routes for cyclists are poor. For its size, Battle is well provided with a wide range of shops, services and community facilities. It functions as a service centre for surrounding villages and there is a significant amount of employment provided in the town centre.
- 3.4 Generally Battle is more prosperous than the average for Rother District, with residents being better qualified and households having a higher income.
- 3.5 Car ownership at Battle is high, which adds to the pressures for car parking and reducing congestion.

Key Issues

- Need to **relieve traffic congestion** in Battle Town Centre (High Street) as well as improve accessibility by alternatives to the car
- **Improve car parking** situation by increasing the number of spaces available
- Need to **support the 'market town' and tourist centre role**, consistent with its important historic and environmental character and setting
- Need to **increase opportunities** for residents **to work locally**
- Ability to **accommodate development without detracting from the character**

Current Policy Position

- 3.6 The location of development should respect the town's close relationship to landform and landscape setting. To the south-west, south of Hastings Road, lies the strategic gap between St. Leonards and Battle. If developed, much of the land that surrounds it would severely detract from the fine setting of historic Battle within the attractive landscape of the High Weald, which is designated as an Area of Outstanding Natural Beauty. These are critical factors constraining further growth. Any extension of the ribbon development needs to be resisted, although the development boundary is drawn to include the consolidated built-up frontage along Hastings Road (A2100).
- 3.7 Notwithstanding the relatively good services and facilities, because of the topography and other over-riding constraints, the growth potential of the town is fairly limited.

Local Plan Allocations

- BT2: Land at Blackfriars, Battle, as defined on the Proposals Map is allocated for housing, education and open space. There is now delegated approval for 245 dwellings on the site.

- BT3: Land north of North Trade Road, Battle, as defined on the Proposals Map is allocated for housing. Planning permission has been granted for 24 dwellings (now under construction) on the greater part of the allocation. It is estimated that a further 12 dwellings could be accommodated on the residue part of the site.

Changes in Circumstances since Plan Adoption:

- Apart from progress on allocation sites BT2 and BT3 highlighted above, it should be noted that at Blackfriars completion of the housing development is now likely to be 2013/14.
- In February 2006, the Council adopted new conservation and design advice for Battle, following a Conservation Area Appraisal.
- A PPG17 – Open Space, Sport and Recreation – Audit and Assessment has been produced by Consultants for the Council. It highlights and prioritises shortfalls in both quantity and quality.
- In April 2007 Battle Town Council published its Local Action Plan.

Strategic Options

- 3.8 The options as put forward at the Issues and Options consultation are presented below.

Option 1: Continued development to support the market town role of Battle.
This would mean a continuation of the adopted Local Plan's strategy

Option 2: A lower growth option, which would largely limit development to infilling and development or redevelopment within the confines of the town's existing development boundary

- 3.9 Option 1 aims to deliver growth in the service centre role of the town, employment and economic opportunities, housing choice and improvements to accessibility through improvements in managing car and coach parking are possible. Option 2 aims to make best use of any development opportunities within the town to consolidate both its role and its urban 'form'.

Public consultation feedback on 'Issues and Options'

- 3.10 In the general consultation two specific questions were asked during the Core Strategy Issues and Options Consultation and they are given below along with a broad summary of the consultation responses.

Question 16 – Should the current objectives for Battle be carried forward or amended and, if so, in what way?

- 3.11 From the small number of responses (8) it can be gathered that development that does take place should be small, controlled and be sympathetic to the surroundings.

Question 17 – Which development option is most appropriate and why?

3.12 The general consensus for this seems to be Option 1, which seeks to continue the level of development set out in the existing Local Plan development strategy for Battle. This would constitute a medium growth option for the town aimed at consolidating or enhancing its service centre role.

3.13 A residents' survey was also carried out during the Issues and Options consultation and this took the form of a questionnaire, which firstly asked residents to rank how important a list of qualities were in making a town/village a good place to live. The following list of qualities was identified as essential or important by at least 75% of the Battle area respondents:

- Shops for day to day to purchase (89%)
- Doctors surgery (89%)
- Post office (88%)
- Chemist (83%)
- Convenient parking at facilities (75%)

Qualities in Battle where respondents considered access to be good or very good:

- Chemist (90%)
- Doctor's surgery (90%)
- Post office (90%)
- Shops for day to day purchases (83%)
- Access to the countryside (75%)

Qualities that stood out as being poor or very poor in the Battle area were as follows:

- Convenient parking at facilities (31%)
- Mix of housing type, size and price (19%)

3.14 A question was asked concerning the need for new development and the importance residents attached to this. The following qualities were identified as important or essential by at least 75% of the Battle area respondents:

- Ensuring design is in keeping with the surrounding area (92%)
- Promoting the inclusion of renewable energy and energy/water efficiency features (88.89%)

3.15 Lastly a question was asked concerning general locations for new development and the results from the Battle area respondents in terms of areas having some or good potential for development are as follows:

- Infilling/higher densities in towns (67%)
- Infilling/higher densities in villages (50%)
- On the edges of Bexhill (81%)
- On the edges of Battle (45%)
- On the edges of Rye (58%)
- On the edges of villages with a range of services (56%)

SPATIAL STRATEGY OPTIONS

Option Characteristics

- 3.16 In assessing the strategy options for the future of Battle for the purposes 'Sustainability Appraisal', the following distinctive attributes and merits were identified:

Table 6 Options for Battle

Central theme	Scale of growth	Main areas of change	Strategy emphases	Strengths/ weaknesses
Support the market town role	Medium	It is unlikely that another site as large as Blackfriars could be found, but it may be possible to find several smaller sites to give similar growth rate. Sites would need to not conflict with the strategy aims, especially the need to conserve the High Weald AONB.	Growth in the service centre role of the town employment and economic opportunities and housing choice. Improving accessibility is likely to prove difficult, but improvements to managing car and coach parking are possible.	<p><u>Strengths</u> Services and facilities should be retained and improved.</p> <p><u>Weaknesses</u> There would be some changes to the physical appearance of Battle.</p>
Consolidate the town's role	Limited / low	Could largely limit development to infilling and development or redevelopment within the confines of the existing development boundary. This approach would give rise to less development than under the existing strategy.	Focus development opportunities within the town to consolidate both its role and its urban 'form'. As a service centre for nearby villages, development in those villages will also impact upon Battle. The level of development at Battle needs to be considered alongside that in the rural areas.	<p><u>Strengths</u> The physical appearance of Battle would be largely unaltered.</p> <p><u>Weaknesses</u> Limited scope for planning gain to improve local facilities, services infrastructure, including affordable housing.</p>

Commentary

- 3.17 Consideration of these options against Sustainability Objectives has shown:

- Option 1 and its associated level of growth present a good opportunity for Battle to enhance its service centre role and sustain its economic growth, provide enough housing to meet the needs of the growing number of households and raise its educational attainment and encourage engagement in cultural and leisure activities. Due to its location in the AONB, the historic layout of the town and historic and archaeological assets, this level of growth is likely to lead to negative impacts on the environmental assets, as well as the usual negative environmental impacts associated with higher levels of development.
- Option 2 has less scope to ensure that everyone has the opportunity to live in an affordable home and for planning gain to help improve local facilities and

services. Greater uncertainty in respect of sustaining economic growth and whether a limited growth option would be sufficient to support growth in the local economy. Potential for greater efficiency in land use and less adverse effects for reducing greenhouse gas emissions, congestion, waste generation and improving air quality.

3.18 The options have also been considered against the strategic Core Strategy Objectives for Battle:

- Option 1 should meet all the objectives of the Strategy and Battle would be meeting its fair share of the rural part of the District's housing requirement to 2026. It is likely that this option will require several small-scale incremental extensions (Greenfield) to the Development Boundary. However, it is considered that this could be achieved and still meet the other objectives of the Core Strategy
- Option 2 meets most of the objectives of the Strategy but fails on two counts. It would not enhance the commercial and tourism attractiveness of the town centre. Battle would not be meeting its fair share of the rural part of the District's housing requirement to 2026. This is particularly important as Battle is arguably the most sustainable settlement in the rural part of Rother District.

Conclusions

3.19 In summary the most benefit to Battle in terms of recognising the town's role providing for local economic, housing and community needs, could be achieved through careful implementation of Option 1. It is considered that Battle should take its share of development (but no more) to 2026. This level of growth would be achievable over the Plan period largely through outstanding commitments as well as unimplemented allocations mainly at Blackfriars that can be carried forward.

DEVELOPMENT STRATEGY OPTIONS

Existing Proposals

3.20 The location of development should respect the town's close relationship to landform and landscape setting. The Blackfriars area is seen as the principal location for future growth. Land in this area lying between Marley Lane and Hastings Road has been earmarked for housing development for some 35 years. It is still considered to be the most appropriate location, and the retention of large open areas that will create a permanent "green lung" extending into the urban fabric of the town should provide amenity for the development and the wider area.

3.21 The current development strategy already provides for over 360 dwellings taking into account completions since 2006, current permissions and allocations. There is only a relatively modest requirement for additional allocations to meet the requirement of the Overall Spatial Development Strategy.

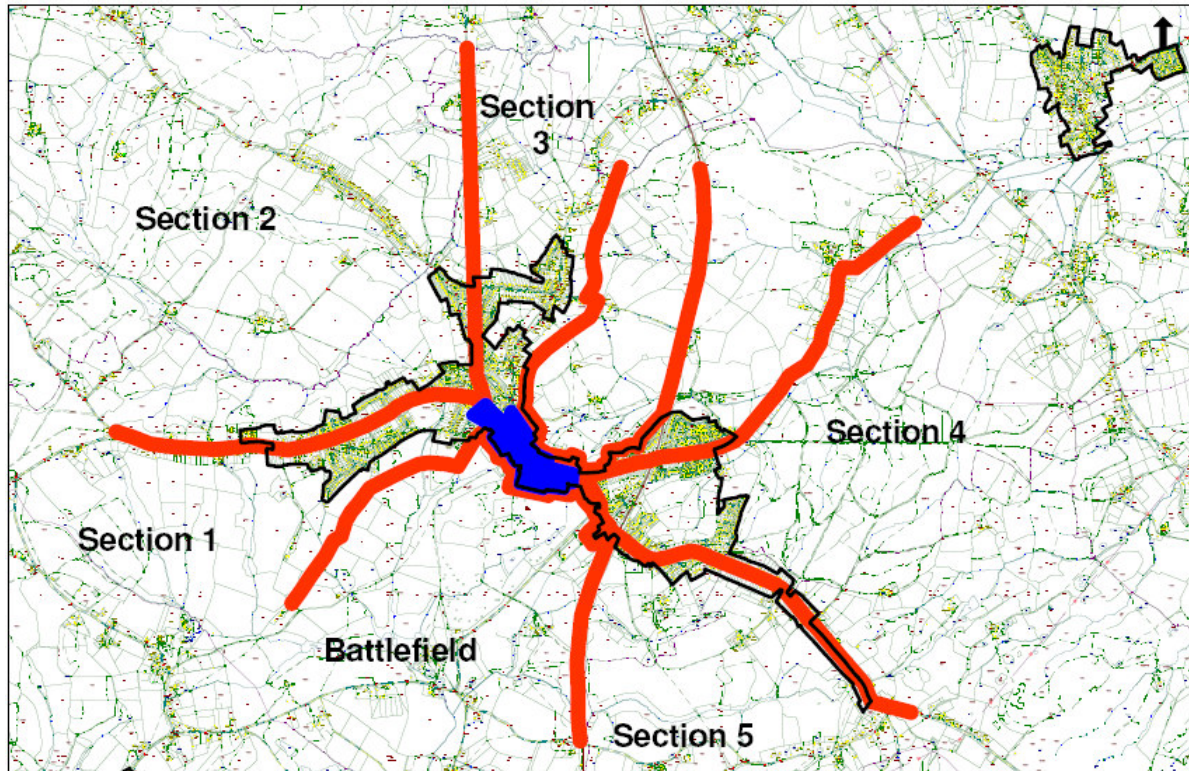
Further broad locational options for development

3.22 The housing growth indicated for Battle by the Overall Spatial Development Strategy at the higher level of the options hierarchy, which has been subject to Sustainability Appraisal, allocates between 22 and 25 dwellings per annum to

Battle. This constitutes a relatively modest level of growth, which with the right cross-cutting policies in place should meet the needs of Battle residents without compromising the landscape setting within the AONB.

- 3.23 In terms of location for new development, areas of search have been identified with a view to determining which offers the best prospects for development that meet the objectives – particularly in terms of reducing congestion and general locational criteria. To this end Battle lends itself to being sub-divided into 5 strategy option areas, these areas are shown on Figure 2. Each has been considered.

Figure 2
Battle: Area of Search



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1. Land south of North Trade Road, west of High Street and north of the historic battlefield.
2. Land north of North Trade Road, west of London Road (A2100) and south of Netherfield Road.
3. Land east of London Road (A2100), north of High Street and west of the open land around Little Park Farm.
4. Land north of Hastings Road (A2100) and east of the open land around Little Park Farm. This area includes the Blackfriars development.
5. Land south of Hastings Road (A2100) and east of the historic battlefield. This area includes a part of the Strategic Gap between Battle and St. Leonards.

- 3.24 Subject to further investigations, it is considered that on balance sectors 4 and 5 offer most potential for sensitive and sustainable development in the longer term.

- 3.25 Whilst sectors 1,2 and 3 have some distinct advantages, in that they are closer to the secondary school and to a lesser extent the primary school, sectors 4 and 5 would better address the key issues as they would:
- Have better access to employment at Hastings/St Leonards, Marley Lane and Station Approach, giving rise to less cross town movements at Battle
 - Have better access to the main line railway station, with more rail users being within easy walking distance from their homes
 - Be generally less exposed within the landscape of the High Weald AONB
- 3.26 In addition, Early Years facilities could be located on the former Local Plan primary school allocation, within sector 4.
- 3.27 Development would rely on improving bus services between Battle and Hastings and improved parking on the eastern side of the town centre.
- 3.28 A further appraisal of the sectors 4 and 5 against a range of environmental, accessibility, infrastructure (including employment) factors is set out in the following tables.

Table 7 Characteristics of the sectors

Sector 4	Sector 5
<u>Environmental designations:</u> AONB; Adjacent to ancient woodland; Free from major flood risk (flood zone 1)	<u>Environmental designations:</u> AONB; Strategic Gap; Adjacent to Conservation Area and Historic Battlefield; Free from major flood risk (flood zone 1)
<u>Topography and landscape:</u> Fields bounded by hedgerow trees and woodland, lower lying in the landscape	<u>Topography and landscape:</u> Undulating fields with hedgerow trees and sporadic pockets woodland
<u>Access:</u> Off Marley Lane	<u>Access:</u> Off A2100 (Hastings Road)

Table 8 Assessment of the sectors

Criteria	Sector 4	Sector 5
<i>Accessibility and linkages to jobs, shops and services by non car modes</i>	Within 1 mile of Town Centre and railway station, good access to Marley Lane employment area	Within 1 mile of Town Centre and railway station.
<i>Contribution to 'building communities' (retain/improve services; mixed uses)</i>	Scope for mixed use and good links with nearby Blackfriars development area and potential for improvement in local services.	Scope for mixed use particularly community and amenity facilities including open space, recreation.
<i>Landscape and environment, including bio-diversity and heritage</i>	AONB and adjacent to ancient woodland. Part of the area of search forms natural bowl in landscape and offers good natural screening advantage.	AONB and adjacent to Conservation Area.
<i>Physical and infrastructure constraints, incl. flood risk, access</i>	Not in flood risk area Infrastructure not thought to be a problem due to nearby Blackfriars development site.	Not in flood risk area
<i>Resource efficiency potential, incl. SUDS,</i>	Greenfield land (more investigation needed)	Greenfield land (more investigation needed)

<i>wind/solar, brownfield, low value land</i>		
<i>Commercial potential, including ownership pattern</i>	(More investigation required)	(More investigation required)

Conclusion

- 3.29 In terms of future growth, the Issues and Options document highlighted that the scale and location of further development should reflect the conclusion of the critical reflection of the town's role including in relation to housing needs, employment opportunities and retail offer, alongside its position in the sensitive AONB landscape.
- 3.30 More detailed work is needed in order to determine any new land allocations, especially in relation to landscape and traffic impacts. It is therefore not appropriate at this stage to put forward a preferred location. It is also worth bearing in mind that only a modest amount of additional land will be required over and above that which has already been allocated.

4 RYE and RYE HARBOUR

CONTEXT

- 4.1 In identifying and appraising strategic options for development and change at Rye and Rye Harbour, the following documents have been reviewed:

Table 9 Documents Reviewed for Rye

Rye Conservation Area Appraisal 2006	Rother Culture & Leisure Strategy 2006-2011
Rye Local Area Transport Strategy 2003	Primary Care Development Plan 2006
East Sussex Landscape Character Assessment	South East Plan Sussex Coast Sub-Region
Rother Local Plan 2006	Rye Economic Appraisal 2004 (Roger Tym and Partners)
Dungeness SAC and SPA Citations	Rother Romney Catchment Flood Management Plan (in progress)
Rye Harbour Management Plan 2003	River Rother Rye Tidal Walls & Embankments West Wall Scheme
Rye Harbour Nature Reserve Management Plan 2005-2009	Employment Land Review 2008
High Weald AONB Management Plan 2004	Strategic Flood Risk Assessment 2008
Rother in Profile 2006	Rural Settlements Strategy 2008
Rother LDF Issues and Options 2006	Retail Assessment 2008
PPG17 Open Space and Recreation Audit and Assessment 2008	

Strengths and Weaknesses

Strengths:

- High quality historic built environment
- High quality landscape setting
- Important archaeology
- Internationally important conservation sites
- Rye Harbour Nature Reserve
- Rye Harbour (cinque ports status)
- Thriving fishing industry
- Shops and market place
- Good range of eateries
- Thriving tourist economy
- Railway station
- Strong perception of place amongst residents

Weaknesses:

- 25% Rye population over 65
- Low % professional occupations
- More than 20% households have no car
- Child poverty
- Low household income
- High unemployment
- Traffic congestion
- Poor sustainable transport choice
- Access to services
- Flooding / emergency planning issues
- Rye Harbour - difficulty attracting cargoes
- Low retention of food shopping trips

- 4.2 In summary, the high quality built and natural environment in and around Rye fuels a strong local tourist industry, with both consequential economic benefits and pressures on infrastructure and the environment. For its size, Rye is well provided with a wide range of shops, services and community facilities boosted by high numbers of visitors. Nonetheless the recent Retail Assessment has shown there is a high volume

of out-commuting for convenience shopping. There is not only a significant amount of employment in Rye itself, but also at Harbour Road between Rye and Rye Harbour. The generally prosperous feel of the town is contrasted with some comparatively high deprivation levels in parts of the town. Flood risk at Rye is very complex; parts are susceptible to tidal flooding, parts to fluvial flooding, parts to surface water flooding and parts to all three types.

Key Issues

- Need to improve **access to services** by sustainable modes of transport and reduce traffic congestion. Through better pedestrian and cycle links within and around Rye, provision of additional services to meet the needs of residents without causing the need to travel by private car.
- Need to improve **affordability of housing** through the provision of some additional affordable housing and improving employment choice.
- Need to improve **housing choice for the elderly** through providing the appropriate mix of dwellings on development sites.
- Need to improve **educational attainment** through improved educational, community and leisure facilities.
- Need to address **child poverty** and **high unemployment** rates – indicators of multiple deprivation, through improved access to employment, community and leisure facilities
- Constrained by **flooding issues** – need to ensure the location of new development is appropriate to the level of flood risk identified through the SFRA and that no increase in flood risk occurs elsewhere as a result of development in areas of lower flood risk.
- Need to ensure the **nationally important, high quality built environment** and the **setting of Rye** is retained and where possible enhanced through development opportunities.
- Need to ensure the **important national and European designated conservation** sites are not adversely affected and where practicable are improved through the implementation of development opportunities.
- Need development to **support the Port of Rye** and its commercial viability which is tested by the River generally only being navigable at best for at least 2 hours before HW to 3 hours after HW (variations occur with changing tides and larger vessels will have a smaller window of opportunity).

Current policy position

- 4.3 The location of development should respect the close relationship to landform and landscape setting. Much of the land that surrounds Rye is within a flood risk area and also, if developed, would severely detract from the setting of Rye. These factors constrain further growth and any extension of the ribbon development and other development on the levels needs to be resisted. The capacity of the town to take significant additional traffic is also limited in environmental as well as physical terms.
- 4.4 The national and international ecological importance of land surrounding Rye and Rye Harbour, in particular for wetland habitats, is recognised through a range of specific nature conservation designations.
- 4.5 Having regard to the planning objectives and development constraints, it is concluded that, notwithstanding the relatively good services and facilities, the future growth of Rye should remain fairly modest.

- 4.6 It is especially important to make best use of existing urban land in order to minimise outward encroachment either on to the levels or into the High Weald Area of Outstanding Natural Beauty, and to protect the setting of the Citadel.

Local Plan Allocations:

- **RY3** Land between South Undercliff and Rock Channel Rye is allocated for housing, open space and appropriate commercial uses.
- **RY4** Subject to the site no longer being required for educational use, some 0.8 hectares of land on the site of the former Thomas Peacocke Lower School, Rye is allocated for housing development.
- **RY5** 3.8 hectares of land north of Udimore Road, Rye is allocated for housing development. (reserve site)
- **RY8** 0.52 hectares of land adjacent to Stonework Cottages, Harbour Road, Rye Harbour is allocated for housing development.

Changes in Circumstances since Plan Adoption:

- Area of land at Rye Harbour has not been included in the new Dungeness, Romney Marsh and Rye Bay SSSI
- Udimore Rd RY5 has been granted planning permission for housing
- Draft Rock Channel Development Brief and accompanying Sustainability Appraisal published on Council website
- New primary school site identified at Love Lane
- Regeneration of employment area at Rye Harbour Rd

Strategic Options

- 4.7 In view of its sensitive landscape setting, historic core and accessibility limitations as well as the proximity of nationally and internationally important wildlife habitats and flooding considerations, it is not anticipated that the Core Strategy should propose that Rye be a focus for high levels of future growth.
- 4.8 The options, developed in view of the policy context outlined above, a suite of evidence-based documents¹ and using the results of the Issues and Options consultation are presented below:

Option 1: Strengthen the market town role of Rye and the commercial role of Rye Harbour and the Port of Rye (medium growth)

Option 2: Strengthen the social functions of Rye and Rye Harbour and make the most of the important environmental circumstances (limited/low growth)

- 4.9 Option 1 has a strong economic and regeneration focus with less attention to environmental assets and constraints and social functions. Option 2 picks up on the social and environmental issues but is less strong concerning the economy and the Port of Rye. In terms of growth a high level is not considered appropriate for Rye and this is supported by the feedback from the public consultation on Issues and Options outlined below.

¹ Evidence based documents are published on the website alongside the Core Strategy and include, for example, the Employment Land Review, the Strategic Flood Risk Assessment, the Rural Settlement Study and the Retail Assessment

Public consultation feedback on 'Issues and Options'

- 4.10 In the general consultation two specific questions were asked during the Core Strategy Issues and Options Consultation and they are given below along with a broad summary of the consultation responses.

Question 18: Should Current Objectives for Rye be carried forward?

- 4.11 Response summary: broad agreement that the current objectives should be carried forward. There appears a general feeling that regeneration and boosting economic activity should be a priority particularly recognising the full potential of Rye Harbour and the associated employment area. Enhancing the waterfront location of the town and improving water leisure activity was also supported. This should be achieved alongside the protection of the biological interest of surrounding sites, landscape and built environment quality and regard to flooding issues.

Question 19: What level of growth is appropriate?

- 4.12 Response summary: the majority of representations concerning this question were in support of a "service centre" approach to development in Rye and recognising its role within the surrounding area. Very little support was given to allowing higher levels of growth. Those in support of very low levels of growth confined to small-scale infilling and intensification did so in recognition of the sensitive nature of the natural environment surrounding Rye as well as floodplain issues and Rye's architectural importance and historical setting. The issue of re-use of previously developed land, and potential contamination is important particularly the Rye Harbour area; the EA has had extensive involvement in the identification of contamination and pollution of controlled waters in this location.

- 4.13 A residents' survey was also carried out during the Issues and Options consultation and this took the form of a questionnaire which firstly asked residents to rank how important a list of qualities were in making a town/village a good place to live. The following list of qualities was identified as essential or important by at least 75% of the Rye area respondents:

- Shops for day to day purchase (92.86%)
- Chemist close by (85.71%)
- Post office close by (78.57%)
- Doctors surgery close by (92.85%)
- Access to regular bus service (85.71%)
- Safe, convenient pedestrian access to facilities (89.28%)
- Easy access to railway station (89.28%)

Qualities in Rye where respondents considered access to be good or very good:

- Access to shops for day to day purchase (75%)
- Access to a chemist (78.57%)
- Access to a post office (85.71%)
- Access to a cash point (82.14%)
- Access to regular bus service (75%)
- Access to the countryside (75%)
- Easy access to a railway station (78.58%)

Qualities that stood out as being poor or very poor in the Rye area were as follows:

- Availability of jobs and business sites (39.29%)
- Availability of housing of mixed type, size and price (64.29%)

4.14 A question was asked concerning the need for new development and the importance residents attached to this. The following qualities were identified as important or essential by at least 75% of the Rye area respondents:

- Providing more affordable housing (82.14%)
- Providing more specialist housing for the elderly (78.57%)
- Ensuring design is in keeping with surrounding area (85.71%)
- Promoting the inclusion of renewable energy and energy/water efficiency features in new buildings (89.29%)

4.15 Lastly a question was asked concerning general locations for new development and the results from the Rye area respondents in terms of areas having some or good potential for development are as follows:

- Sites in towns, by infilling/higher densities (71.43%)
- Sites in villages, by infilling/higher densities (71.43%)
- On the edges of Rye (50%)
- On the edges of villages that have a range of services (60.72%)
- (On the edges of Battle (53.58%))
- (On the edges of Bexhill (60.72%))

SPATIAL STRATEGY OPTIONS

Option Characteristics

4.16 In assessing the strategy options for the future of Rye for the purposes of 'Sustainability Appraisal', the following distinctive attributes and merits were identified:

Table 10 Options for Rye

Central theme	Growth	Main areas of change	Strategy emphases	Strengths/ weaknesses
Strengthen market town and commercial role of Rye and Rye Harbour and Port of Rye	Medium	Extension to development boundary north of Rye. Extension to employment area west of Rastrum site. Regeneration of parts of town, town centre.	Service centre role, employment and economy housing choice.	<u>Strengths:</u> Regeneration Significant affordable housing Opportunity to deliver increased housing choice Enhance service centre role <u>Weaknesses:</u> Unrealistic land requirements significant amount Greenfield land
Strengthen social functions of Rye and Rye Harbour make the most of the environment	Limited / Low	Within development boundary and Employment Area - focus on infill redevelopment Regeneration of parts of town, town centre.	Social functions: accessibility; community facilities: housing choice: environmental assets.	<u>Strengths:</u> Safeguarding against further deterioration of the setting of Rye; views to and from the AONB; Regeneration; Better connectivity <u>Weaknesses:</u> More limited scope for affordable housing and improving housing choice

Commentary

4.17 Consideration of these options against Sustainability Objectives has shown:

- Option 1 and its associated level of growth present a good opportunity for Rye to enhance its service centre role and sustain economic growth, provide enough affordable accommodation and choice of accommodation to meet the growing number of households and raise its educational attainment as well as facilitating engagement in cultural and leisure activities. Due to Rye's significant national historic importance, rich archaeology, ecology and location on the edge of the AONB, this level of growth is likely to lead to adverse impacts on Rye's environmental assets.
- Option 2 has less scope to ensure that everyone has the opportunity to live in an affordable home and this is particularly important in light of the Housing Needs Assessment identifying a significant need for affordable housing in Rye. The option is generally more positive than option 1 for environmental matters and presents marginally less opportunity for enhancing and addressing social functions and issues.

4.18 The options have also been considered against the strategic spatial Core Strategy objectives for Rye:

- Option 1 should facilitate the economic and social aspirations of the Plan through recognised regeneration opportunities and the identification of additional land for employment and residential uses. It is less clear how this option would be able to meet the objective in terms of respecting and sensitively managing the high quality setting and surrounding ecological resources, given the amount of land that will be required for this level of growth. Rye is not only a rich historic, architectural town, surrounded by important archaeological, ecological and landscape designations, it is also an area with significant flood risk issues. This results in limited opportunities for outward growth.
- Option 2 has a much stronger environmental focus and aims to recognise the important environmental assets and their value to Rye and its economy. The levels of growth associated with this option would not necessarily present the same opportunities for delivering improved economic growth as option 1, but should help to sustain the economy through a more innovative approach to green tourism and making the most of its waterside location. In considering improving the social well-being of Rye this option should deliver improvements in line with recognised inadequacies such as a good linking public rights of way network and regeneration of parts of the town, however there will be less opportunity to deliver housing choice and affordability to all in need.

Conclusions

4.19 Given the sensitive nature of Rye's important assets; its architectural and archaeological heritage, its landscape setting, internationally recognised ecological assets and vulnerability to flooding; alongside the social and economic issues associated with Rye; unemployment, child poverty and limited access to a choice of affordable housing; neither option would necessarily deliver a satisfactory strategy in all aspects.

- 4.20 Therefore it is proposed that an amalgam of the two options might present the best opportunities for the area. Clearly there is a need for an economic focus, as indicated by the draft South East Plan and this should include support of the Harbour Road employment area and the Port of Rye.

DEVELOPMENT STRATEGY OPTIONS

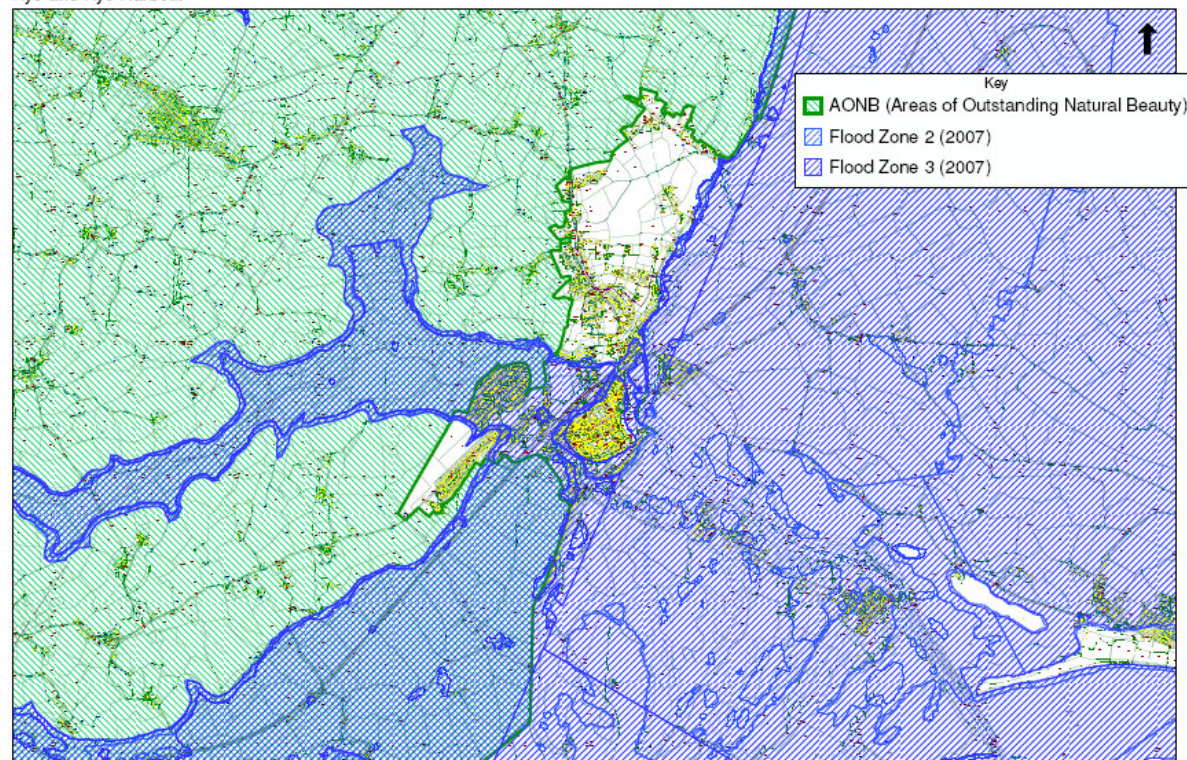
Existing proposals

- 4.21 The location of development should respect the close relationship to landform and landscape setting. Much of the land that surrounds Rye is within a flood risk area and also, if developed, would severely detract from the setting of Rye. These factors constrain further growth and any extension of the ribbon development and other development on the levels needs to be resisted. The capacity of the town to take significant additional traffic is also limited in environmental as well as physical terms.
- 4.22 The current development strategy already provides for over 300 dwellings and taking into account completions since 2006 and current permissions this accounts for planned development of 430 dwellings; there is only a small requirement for additional allocations to meet the requirement of the Overall Spatial Development Strategy.

Further broad locational options for development

- 4.23 The housing growth indicated for Rye by the Overall Spatial Development Strategy at the higher level of the options hierarchy, which has been subject to Sustainability Appraisal, allocates an approximate 22 dwellings per annum to Rye. This constitutes a relatively limited growth option, which with the right cross-cutting policies in place (particularly in respect of affordable housing provision) should meet the needs of Rye residents without compromising the area in respect of its assets and flood risk issues.
- 4.24 In terms of location for new development, as a first stage a basic 'sieve analysis' has been undertaken to provide 'areas of search' that are free from environmental constraints such as floodplain, AONB and internationally designated conservation sites. This is shown in Figure 3.

Figure 3
Rye and Rye Harbour



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North of Rye

- 4.25 This relates to land contiguous with Rye up to and north of the development boundary, to the east and west of the A268. To the west, this land lies in the parish of Rye Foreign and to the east of the A268 it falls within Playden Parish.

West of Rye

- 4.26 This includes land extending westward from the Local Plan allocation RY5 at Udimore Road. This is a smaller area of search than to the north of Rye and looks to utilise the area of land adjacent to RY5 that also falls outside the AONB.
- 4.27 A summary of the appraisal of each area of search against a range of environmental, accessibility, infrastructure (including employment) factors is set out in the following tables.

Table 11 Description of areas of search

North of Rye	West of Rye
Environmental designations: Parts of the area are adjacent to the AONB Part of the area is in an Archaeologically Sensitive Area Area is free from flood risk (flood zone 1) Some distance from the international conservation designations	Environmental designations: Area is adjacent to the AONB Area is free from flood risk (flood zone 1) but is adjacent to areas of flood risk (flood zones 2 and 3) Area is some distance from the internationally designated conservation sites
Topography and landscape: Rolling fields with mature hedgerows, wooded in parts and areas of steeper gradient	Topography and landscape: Field mostly under grass bordered by hedgerow and small open grassland area opposite

<u>Access:</u> Main road access is by Udimore Road or may connect to the RY5 site	<u>Access:</u> Depending on which specific parts of the whole area of search are considered, main road access by the A268 or Leasam Lane
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Table 12 Assessment of areas of search

Criteria	West of Rye	North of Rye
Accessibility and linkages to jobs, shops and services by non car modes	Approximately 1.5km from train station, central bus services and other town centre services	Between approximately 1 and 1.5km from train station (this would involve travelling up hill from the station), central bus services and other town centre services
Contribution to 'building communities' (retain/improve services; mixed uses)	Scope for mixed use and tie in with neighbouring reserve site	Scope for mixed use; potential for retention and improvement of some local services
Landscape and environment, including bio-diversity and heritage	No direct landscape constraints – though adjacent to AONB. No conservation / biodiversity or heritage constraints	No direct landscape constraints though parts adjacent to the AONB. No conservation / biodiversity constraints. Area within the Archaeologically sensitive area
Physical and infrastructure constraints, incl. flood risk, access	Flood Zone 1 (lowest risk) Infrastructure not thought to be an issue due to reserve site adjacent that could tie-in with	Flood Zone 1 (lowest risk). Possible issues: access and gradient other infrastructure including utilities
Resource efficiency potential, incl. SUDS, wind/solar, brownfield, low value land	Greenfield land	Greenfield land
Commercial potential, including ownership pattern	Thought to be 1 land owner (more investigation required)	Thought to be in multiple ownership (more investigation required)

Conclusion

- 4.28 In terms of future growth, the Issues and Options document highlighted that the scale and location of further development should reflect the conclusion of the critical consideration of the town's role; specifically whether it enhances its service centre and commercial role as a focus or seeks to strengthen its social functions and makes the most of its environmental assets.
- 4.29 More detailed work is needed in order to determine any new land allocations, especially in relation to landscape, infrastructure and traffic impacts, it is therefore not appropriate at this stage to put forward a preferred location. It is worth bearing in

mind that relatively little, if any, additional land may be needed to accommodate new development, given the current strategy approach.