

Submission Rye Neighbourhood Plan Review  
Summary of Representations

Respondent Details			Agent Details		Part of Neighbourhood Plan		Summary of Comments	Participate in oral exam	Notify when NP made
Reference	Respondent Name	Organisation (if applicable)	Agent Name	Organisation (if applicable)	Item	Support/ Object/ Comment			
Statutory									
RNP/R16/2025/1	Edward Sheath	East Sussex County Council			Whole plan	Comment	<p>1. 'walking, cycling and wheeling' tends to be referred to as 'walking, wheeling and cycling</p> <p>2. We strongly recommend that the East Sussex Local Transport Plan 4 (LTP4) 2024 - 2050, and the East Sussex modal strategies - Local Cycling &amp; Walking Infrastructure Plan (LCWIP), Bus Service Investment Plan (BSIP), Electric Vehicle Charging Strategy and the emerging Rail &amp; Freight Strategy - are referenced within the opening section 'Connectivity and Sustainable Transport'.</p> <p>3. Traffic Issues, Paragraph 5.10, Page 98 – We recommend that reference to LTP4 and the following Investment Plan priorities should be made in this paragraph which would help demonstrate the NP is in general conformity with the strategic transport policies for the area:</p> <ul style="list-style-type: none"><li>Investment priorities   East Sussex County Council – strategic priority SP01, local priority LP01, and cross-cutting priority CP03</li><li>Appendix A - Short-term priorities   East Sussex County Council - potential investment S002, S015, L029, L032, C003, L049, L050</li></ul> <p>4. In consideration of the bus network and availability of Flexibus (Flexibus   East Sussex County Council) in the area, and the connections to local neighbouring communities and intra-urban links (e.g. to Hastings) we continue to recommend that reference to Flexibus is included in the NP to ensure it is in general conformity with the strategic transport policies for the area. Whilst there are ambitions in the NP to reduce car traffic destined for the town, little consideration is given to local and strategic connections by active travel modes or bus, particularly from local villages, which needs to be reflected.</p> <p>5. Connectivity and Sustainable Transport, Paragraph 4.62, Page 67 – The text refers to the 'East Sussex County Council Cycling, Walking and Wheeling Strategy' however, the name of the Strategy is the is the 'East Sussex Local Cycling &amp; Walking Infrastructure Plan'.</p> <p>6. Policy T1 Connectivity and Sustainable Transport, e., Page 68 - Policy T1 e) – the capitalisation of the text 'East Sussex Cycle Standards' seems to indicate that this is a standalone document. To clarify this is not the case as the parking guidance for cycle provision is included within 'ESCC Guidance on Parking at New Developments (March 2024)'.</p> <p>7. Parking, Paragraph 4.63, Page 71 – the penultimate line should be revised to refer to 'ESCC Guidance on Parking at New Developments (March 2024)'.</p> <p>8. Parking, Footnote 58, Page 71 The link included in footnote 58 does not work. Please replace with: Transport Development Planning – forms and guidance   East Sussex County Council</p> <p>10. Through Routes Paragraph 5.14, Page 99 – Replace 'Highways England' with 'National Highways'.</p> <p>11. Traffic, Access and Getting Around, Paragraph 4.54, Page 65; There is a typo in the second sentence - 'There' not 'The'. There is also an unnecessary line break in this paragraph.</p> <p>12. Enterprise and Employment Training for Specific Skills and Enterprise Paragraph 5.4, page 96 - Local Enterprise Partnerships (LEPs) are no longer in place so the language and reference to this need's updating. Where the reference is made to "The Town Council will work in partnership with the local authorities, Local Enterprise Partnerships (LEPs)" it is strongly recommended that this is replaced with Skills East Sussex and the Local Skills Improvement Partnership.</p> <p>13. Policy T1 Connectivity and Sustainable Transport, d., Page 68 - Point T1d, states: "To protect existing public rights of way and to consider new routes where practical." This should be amended to more closely reflect the NPPF Para 104 to ensure the basic condition to have regard to national policies is met: "Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails."</p> <p>14. Connectivity and Sustainable Transport, Paragraph 4.61, page 66 and Green Tourism, Paragraph 5.9, Page 97 – There are typos with the acronym for the King Charles III England Coast Path; it should say KCIIIECP.</p>		
RNP/R16/2025/2	Darren Kirkman	National Highways			Whole plan	Comment	<p>1. National Highways have no objection to the Neighbourhood Plan.</p> <p>2. We note that the Rye Neighbourhood Plan allocates sites to provide at least 200 new dwellings to 2028 . National Highways will be looking to the emerging Rother District Local Plan to identify the cumulative overall traffic impacts and any necessary mitigations across Rother District including the Rye Neighbourhood Plan area. However, each of the sites allocated in the Rye Neighbourhood Plan will need to be supported by a Transport Statement/Assessment and Travel Plan at planning application stage.</p> <p>2. We note the community aspirations and welcome discussion with people who have ideas for our network.</p> <p>3. Policy H4 refers to the need for an improvement from St Margaret's Terrace onto the A259. Any improvement works to, or impacting on, the A259 will need to be agreed with us.</p> <p>4. The document contains two references to "Highways England" (in paragraph 5.14 and Page 121 Statutory Consultees) which should be amended to "National Highways"</p>		
RNP/R16/2025/3	Sally Wintle	Natural England			Whole plan	Comment	Natural England does not have any specific comments on this draft neighbourhood plan.		
RNP/R16/2025/4	Catherine Adamson	Southern Water			Policy H3, paragraph 8	Comment	<p>We explained in response to the Regulation 14 consultation that we would strongly support the inclusion of additional sustainable design principles in this policy H3, in particular the addition of sustainable urban drainage considerations. This request was in line with the broader content of the Neighbourhood Plan and the additions were made to policies H4 – H8 in response to our other representations but not to Policy H3. Instead the 'layout' wording added to part (g) of Policy H3 is not required and was not requested by Southern Water (we requested this wording for policies H4, H6 and H8 only). This wording can be removed from policy H3:</p> <p>Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</p>	N	Y
RNP/R16/2025/5	Catherine Adamson	Southern Water			Policy H3	Comment	<p>We request the following changes to Policy H3, section (e) so that it reads as part (d) of policies H4, 5, 6, 7 &amp; 8 that reads:</p> <p>d. SuDS measures should be incorporated, taking appropriate account of local conditions. Measures should include flow attenuation (such as green roofs) and water re-use such as rainwater harvesting, surface water harvesting and/or grey water recycling systems. Existing surface water flow routes and drainage features within the site should be identified and preserved eg ditches and seasonally dry watercourses.</p>	N	Y
RNP/R16/2025/6	Catherine Adamson	Southern Water			Policies H4,6 & 8	Comment	<p>The following wording was added to these policies in response to our representations at the Regulation 14 consultation stage:</p> <p>Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</p> <p>We also explained that the wording below was not needed (but this wording has been retained in these policies – it can be removed):</p> <p>Occupation of the development shall be phased to align with the delivery of sewage infrastructure.</p>	N	Y
RNP/R16/2025/7	Cllr Theresa Killeen	Rother District Council			Whole Plan	Comment	<p>1. the Plan needs to be clear, if referring to the emerging Rother Local Plan (RLP), that the emerging RLP currently has no weight in decision making. This includes the "total housing growth in emerging Local Plan", listed in the table on page 28 of the Neighbourhood Plan (NP).</p> <p>2. Pg.6 Reduce Flood Risk (Policy F1) - Note that since the NP was first made, the national requirements set out in the National Planning Policy Framework (NPPF) have changed such that the Sequential Test must now "steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test." The advice of the Environment Agency should be sought.</p> <p>3. Pg.6 Traffic Management: Electric Vehicle Charging Points should be written out in full for online accessibility.</p> <p>4. Pg.20 paragraph 2.4 – the vision is stated as being to 2040. This should be amended to 2028 in line with the plan period.</p> <p>5. Pg.27-28 Housing - The table is still requiring more information, such as dates, to be clear. Indeed, the inclusion of draft RLP figures within this table introduces potential confusion. The NP is working to the RDC adopted Core Strategy (2014), and consequently it may be advisable to include the Core Strategy figure instead or as well.</p> <p>6. Pg. 30 Policy H1 Housing – The policy states that the allocations would provide at least 190 dwellings. However, the table on pg.27/28 states the need is 205 dwellings.</p> <p>7. Is the Town Council confident that all site allocations are still available and achievable? We have concerns about Winchelsea Road East which is in multiple land ownership.</p> <p>8. Pg.33 Policy H3 Former Tilling Green School - Part (b): This is a new criterion and as worded, its meaning is unclear. The provision of affordable housing as part of a development would already be a requirement under the relevant Local Plan policy.</p> <p>9. Pg.48 D1 High Quality Design – we made the following comments at Regulation 14, which still stand:</p> <p>Part a: Rother District Council's preferred design assessment framework is Building for a Healthy Life (BHL), as referenced in Paragraph 138 of the NPPF. In the absence of locally produced design codes, national documents such as the National Design Guide and the National Model Design Code should be utilised to inform decision-making (as per Paragraph 134, NPPF). While the principles of Secured by Design can also be referenced, it is crucial to ensure that safety measures do not compromise the accessibility and social interaction that BHL promotes.</p>	Y	Y

Submission Rye Neighbourhood Plan Review  
Summary of Representations

							In the absence of locally produced design codes, national documents such as the National Design Guide and the National Model Design Code should be utilised to inform decision-making (as per Paragraph 134, NPPF). While the principles of Secured by Design can also be referenced, it is crucial to ensure that safety measures do not compromise the accessibility and social interaction that BHL promotes. Part i: Consider establishing a connection to the delivery of the proposed network of walking and cycling routes in Rye, as outlined in the East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP). 12. Pg. 56 Reducing Flood Risk – (i) this could be reworded to be clearer, it needs to be consistent with national policy on unstable land. 13. Pg.60 Policy B1 Employment and Business Development - The additional line "Where business proposals occur in areas where there are residents, design shall allow for the minimising of noise and exhaust fumes from kitchens;" requires some clarification in order to be used by decision makers. 14. Pg. 62 paragraph 4.51 – We would like the reference to 'Aldi' replaced with 'supermarket'. A reference to a specific operator in a development plan document is inappropriate. 15. Pg. 63 Policy T1 Connectivity and Sustainable Transport - Part (a): We recommend further detail is added to this criterion to explain what the "hub" means, along the lines of the bullet point list in paragraph 4.61 (car and bike charging points etc). 16. Pg.73 Policy I1 Infrastructure and Community Facilities – we recommend changing the last sentence of the policy to 'New development should mitigate the unmet need for infrastructure created by the development.' 17. Pg.87 Policy E4 Renewable and Low Carbon Energy - Part (b): This requires some clarification i.e. where would it not be appropriate? Part (d): we would suggest the emerging Local Plan itself is not referred to in the policy text. However, the emerging Local Plan uses LETI and BREEAM Standards to guide development and we recommend these are referred to in the policy		
Non-Statutory									
RNP/R16/2025/8	Dr Anthony Kimber	Rye Neighbourhood Plan Steering Group			Whole plan	Comment	We make representation to increase the plan timeline. Given the enormous amount of time by volunteers to make and review the plan, (18 months part time for the review) we would seek at least 5 years for the timeline. If it is agreed that the timeline could be extended then we would seek at least from 2025 to 2030.	Y	Y
RNP/R16/2025/9	Derek Wolfson				Chapter 5, Paragraph 5.24	Objection	I disagree with the statement " Pedestrianisation is impracticable because of the lack of side access for delivery vehicles and community transport. " The Citadel and High Street must be pedestrianised as they have been in many similar towns in France. Deliveries should be arranged for very early or late hours and access controlled by electronic bollards.	N	N
RNP/R16/2025/10	Jonathon Bennett				Pg. 29	Comment	There is need for Social & Affordable Housing in the area. First steps have been made to set up a CLT (Community Land Trust) for Rye. This will have the full backing of the RTC (Rye Town Council) and will seek to develop and provide Social/Affordable Housing in the allocated areas (P29). Once set up the CLT will also be able to pacitipate in other areas of community benefit for Rye (P30). The CLT will provide a mix of housing as set out on P31, partnerships with other providers such as housing associations will be formed accordingly. There are four sites that could be available for development within the NP. Tilling Green (P33), where up to 25 units could be built and still retain the existing community centre. Rock Channel (P35) to provide up to 40 homes. Freda Gardham School (P41). The CLT model for this site would retain the existing school building to be refurbished and would become the permanent home of the Rye Creative Centre (RCC) with side by side development of up to 40 Social/Affordable homes. This would require an H7 boundary change to make the former school building part of B3, mixed development. Windfall Sites (P45), as set out within the RNP a further 20 dwellings could be possible on these areas.	Y	Y
RNP/R16/2025/11	Nick Hanna				Pg. 63	Objection	I oppose the development of the Aldi supermarket on this site. This would lead to an unacceptable levels of traffic congestion as people from surrounding villages will drive in to do their shopping, further adding to Rye's traffic issues.	Y	Y
RNP/R16/2025/12	Nick Hanna	Sussex Greenways			Policy T1, Figure 50, Pg. 100	Comment	The Marks Barfield study regarding road improvements to Strand Quay no longer aligns with policy goals of Rother District Council or East Sussex County Council in terms of reducing traffic and developing a low carbon economy. We suggest that a walking, wheeling and cycling bridge across the River Brede would be of much greater significance and at a far lower cost. Given the amount recently invested by the Environment Agency on improving the moorings at Strand Quay, this would of necessity have to be a swing bridge to allow for boat traffic. The swing bridge would not only become a central fulcrum for Active Travel routes through and within Rye but also a tourist attraction in its own right.	Y	Y
RNP/R16/2025/13	Pete Verlander				Pg.39	Comment	I have noticed a couple of inconsistencies on the new RNP. Page 39 - Winchelsea Road [West Side] - Item 4.16, First line: "During 2014 . . . " This should read 'During 2024 . . . Furthermore, the last statement says "Aspects of flood risk, access and the housing mix are under detailed consultation". I live in the bungalow right next door the the site, in the adjoining property. My garden is at the lowest point around topographically and regulary floods during long periods of rain. Nobody has included me in any consultation. I feel somewhat aggrieved that I haven't been consulted in the matter and I would very much like for the situation to be amended a.s.a.p.		
RNP/R16/2025/14	Jempsons Supermarkets Ltd		Peacock and Smith	Chris Creighton	Policy H6	Objection	We have objected to planning application (Ref. RR/2024/976/P), to develop a new out-of-centre foodstore of 1,863 sq. m gross for Aldi on an allocated housing site at Winchelsea Road West (Site Ref. H6)on behalf of Jempsons and Morrisons, to this application as we consider that the proposed Aldi would have a significantly adverse impact on the town centre . There are also unresolved highway objections and no justification for the loss of employment land. The District Council has engaged an independent retail planning consultant, Nexus, to review the Aldi proposal. In their January 2025 report to the District Council, we note the comment by Nexus at para. 2.47 that they are 'minded to agree with the general points made by P+S in the objection letters on behalf of Morrisons (and Jempsons).'		
							The planning application remains undetermined as of March 2025. We object to the Neighbourhood Plan Review's proposed allocation of land at Winchelsea Road West (site Ref. H6, i.e. the site of the proposed Aldi for a convenience store), as this is based on an out-of-date assessment of retail need, carried out 15 years ago in 2013, as part of the adoption of the 2014 Core Strategy. This has been superseded by a more recent assessment of need carried out for the District Council in 2023 (Retail & Town Centre Uses Study, Lambert Smith Hampton), which identified at para. 9.19 a 'need' for just 113 sq. m net of additional convenience retail floorspace in Rye by 2032. The Neighbourhood Plan Review should make reference to the more recent assessment of need. We therefore consider that the Neighbourhood Plan should: 1) Remove the reference to Site H6 on p. 28 as being suitable for a convenience store, as the current planning application is unresolved; 2) Include a reference at para. 4.16 that the retail impact of the Aldi proposal is also under consideration; 3) Remove reference at para. 4.16 to Aldi being 'award-winning', as this appears to bestow on Aldi a preferred operator status, which is not relevant to planning; and 4) Remove the reference at para 4.51 to the now out-of-date assessment of need for 1,650 sq. m net additional retail floorspace and refer instead to a more recent assessment of need for 113 sq. m net by 2032.		

Submission Rye Neighbourhood Plan Review  
Summary of Representations

RNP/R16/2025/15	Martello Developments		Whaleback	Molly McLean	Housing	Comment	<p>Martello Developments are progressing plans for three site allocations (Tilling Green, Rock Channel and the former Freda Gardham School).</p> <p>The NPPF has introduced a new standard method for calculating local housing need (0.8% of existing housing stock to account for population growth). This has increased Rother District Council's required housing supply by approximately 27%.</p> <p>The proposed minimum housing numbers to be allocated within the RNP remain at 205 which is insufficient to meet local housing need for the following reasons:</p> <p>The Standard Method has increased - The housing numbers listed in Section 4 of the draft RNP indicate that the site allocations will deliver at least 205 new homes in Rye + 40 new homes in Rye Harbour across the plan period (2016-2028) to meet local housing need. The Regulation 18 Rother Local Plan predated the new NPPF in December 2024 and so its housing need figures are already out of date in light of the new Standard Method. With a new housing need figure which has increased the housing land requirement by approximately 27% it follows that the RNP local housing need figure would need to increase as a result. The RNP local housing need should be marked as indicative or suspended until the Rother District Local Plan provides the updated local housing need for the RNP area based on up to date District housing need using the new Standard Method.</p> <p>Rother District has a history of under-delivery of housing across the wider District. In Rye specifically, there is also evident under-delivery of new homes. The previous Rye Neighbourhood Plan (adopted 2019) allocated 6 sites yet none have come forward. We do not consider sites H5 &amp; H6 (Winchelsea Road East &amp; West: minimum of 40 new dwellings) to be deliverable within the plan period as the land parcels are within multiple ownerships which creates a protracted land assemble and disposal process. The sites are also subject to access issues, flood risk and other abnormal build costs that will affect viability and deliverability. In the case of Rock Channel site A, whilst Martello Developments are seeking planning permission for the southern section of this site, the status of the remaining land is that the land is not available for sale nor has a planning application has been submitted. We consider that the housing targets and site allocations listed in policy H1 of the draft RNP would fail meet up to date local housing need, contrary to the NPPF and advice issued by the Secretary of State. This would be contrary to condition A of the 'basic conditions'. Furthermore, we consider that some of the sites are not deliverable as per annex 2 of the NPPF and the RNP should look beyond existing site allocations to meet the growing need for housing in the town.</p>		
-----------------	-----------------------	--	-----------	--------------	---------	---------	--	--	--

--	--	--	--	--	--