

Header	Representations	FINAL as at July 2025	
	<b>Rye Neighbourhood Plan Review Reg 14 Representations by/to Agency\Initiator and RNP Coordinator</b>	<b>First consultation (C1) initially ran to 26 Nov 24. Examiner in Apr 25 required a repeat of the consultation (C2) to better meet the requirements of the Act. This ran from 9 Jun to End July 2025.</b>  <b>These representations reflect all the comments received in both Reg 14 consultations (Shown as C1 and C2)</b>	<b>Action by RNP Coordinator after 26 Nov following representation</b>
C1 –1	Rye Cricket Club (To be CIO/CIC)	Add text to cover windfall proposal for Rye Cricket Salts.	Include reference to Windfall developments
C2 -1 14 Jul 25	Rye Cricket Club	Add reference to work by Rye CLT	
C1- 2	RNP Coordinator on Current Proposals	To consider any impacts of the proposals by developers at the Lower School Site and Winchelsea Rd continue, particular on flood risk mitigation and traffic.	Amend Policy H6 on P 39 and Policy H8 on P42
C1 -3	Resident New Winchelsea Road	Reflect a series of changes as below.  Pg 30 see text box on right; duplication  Pg 32 text box on right, and highlight at bottom of page - query whether repetition of retention / wording as intended ? Duplication	Amend text to reflect on pages identified.

		<p>Pg 54 see highlighted text - needs updating as have now left EU; Yes</p> <p>Pg 60 at bottom - formatting;</p> <p>Pg 70 see text box on side - suggestion only;</p> <p>Pg 72 - formatting - shift up?</p> <p>Pg 111 - see highlighted text - ...flounder... (not founder);</p> <p>Pg 119 - see highlighted - consistent whether Berni or Bernadette;</p> <p>Pg 91-92 - Green Tourism - should mention "to support Rye Harbour Nature Reserve" As Trustee of FRHNR, I would be pleased to consider opportunities.</p>	
C2 – 3 15 Jul 25	RNP Coordinator	<p>Reconcile housing numbers to reflect review of Rye Site Assessment</p> <p>Adjust policy H7 and B3 to reflect minor changes in allocation: B3 as mixed; H7 old school building - consider retaining; H7 green space – allocated for housing; H7 old swimming pool – mixed.</p> <p>Reconsider windfall policy to reflect developments by Rye CLT</p>	<p>Amend numbers on P28 and 29</p> <p>P41 - H7</p> <p>P30 and 31</p>

C1 – 4	Member of Public to RNP Coordinator	A strengthened policy on shop fronts and <b>street furniture</b> is proposed covering retention of design and colour.	Amend Policy D1 on P46
C1 - 5	KSL for Environment Agency Planning Advisor – Kent and South London Sustainable Places, Environment Agency, West Malling, Kent, ME19 5SH	<p>Reflect initial comments from KSL: We are interested in commenting on Ryes updated Neighbourhood plan.</p> <p>Request a shapefile of the potential site allocations. This would save us a lot of time in screening each site and offering our comments and/or support on the sites. Rye has no separate mapping data on the sites however there are SSFRAs for most allocated sites:</p> <ul style="list-style-type: none"> <li>• H3 - Former Tilling Green School for at least 20 dwellings SSFRA by Amicus Horizon in 2015. RDC planning site.</li> <li>• H4 - Rock Channel for at least 30 dwellings SSFRA by Martello as Bridge Point on RDC site.</li> <li>• H5 - Winchelsea Rd East for at least 10 dwellings SSFRA by Martello for development of Grist Mill site on RDC site.</li> <li>• H6 - Winchelsea Rd West for at least 20 dwellings</li> </ul>	Await any specific comments about Flood Risk and reflect in text from P47 and Policy F1 on P53.

		<p>SSFRA for proposal by Decimus on RDC site.</p> <ul style="list-style-type: none"> <li>• H7 - Freda Gardham School for at least 30 dwellings</li> </ul> <p>No proposal as yet</p> <ul style="list-style-type: none"> <li>• H8 - Lower School Site for at least 50 dwellings</li> </ul> <p>SSFRA by Plutus for proposal on RDC site.</p> <p>Please see the attached which includes some further advice you may find helpful.</p> <p>1) H4, H7 and H5 are in the vicinity of flood defences. Any new development should consider the appropriate by-law margins for these areas (8 metres for main rivers 16 metres for tidal), as it is likely the Environment Agency would object to anything that encroaches into this margin. Where appropriate, the requirement for a Flood Risk Activity Permit needs to be followed.</p> <p>2) In relation to H7 it states <i>“The development shall not commence until the flood mitigation works by the Environment Agency for the eastern bank of the River Rother (Eastern Rother Tidal Walls) have been</i></p>	
--	--	---	--

		<p><i>fully implemented (work started in late 2022 and due for completion by 2025);</i>  The planned completion for Rother Tidal Walls East (RTWE) is autumn 2025. However, for awareness there will be 1 or 2 years (tbc) of maintenance such as topsoiling and establishment of vegetation and Public Rights of Way works.</p> <p>3) In the allocation policies there is text similar to the below for H3 (e), H4 (c), H5 (e) and H7 (c).  <i>“A site specific flood risk assessment demonstrates that the residential development is safe for the lifetime of the development incorporating appropriate flood resilient and resistant measures including safe access and escape routes”</i>  If possible, can the wording be changed to “A site specific flood risk assessment demonstrates that any residential development is safe for the lifetime of the development, taking into account future climate change scenarios, <i>incorporating appropriate flood resilient and resistant measures including safe access and escape routes.</i> Ensuring all development is raised above the design flood level with an allowance for Climate Change, and if</p>	
--	--	---	--

		<p>flood defences are present the estimated flood level should account for the residual flood risk if they breached or overtopped.”</p> <p>4)The wording of Policy F1 – Reducing Flood Risk (Pages 6 and 53), the wording could also be amended to include “taking into account future climate change scenarios”.</p>	
<p>C2 - 5</p> <p>9 Jun 25</p>	<p>KSL for Environment Agency Planning Advisor – Kent and South London Sustainable Places, Environment Agency, West Malling, Kent, ME19 5SH</p>	<p>We acknowledge and confirm that we have further comments to add.</p>	<p>NFA</p>
<p>C1 - 6</p>	<p>RNP Coordinator</p>	<p>Strengthen policy on land instability following the land slips on the north side of Military Road and the bank slip west of the Brede Sluice.</p>	<p>Add policy on land instability policy to F1 on P53</p>

C1 - 7	<p>Multiple artists of the Rye Creative Centre CIC located in the Former Freda Gardham School (Rye Creative Centre and related CIC) about future accommodation</p> <p>From the RCC CIC:</p>	<p>On behalf of over 30 artists, (some known collectively as “New Road Artists” and “The Studio” seek proposals to rehouse displaced artists by mid 2025 (By developer Martello and the RCC CIC) from the Former Freda Gardham school site.</p> <p>Head of Estates Management at ESCC proposes a suggested solution to provide an arts facility on site B3 of the former Freda Gardham, rather than the allocated development but a full proposal would be necessary.</p> <p>(See also comments from Rother DC dated 3 December below)</p> <p>It is essential that the artist community at the RCC renting studio space and using the facilities (known as the New Road artists) are regimes as part of this process.</p> <p>They represent a core working creative community in Rye and breaking it up would be a mistake – so as part of the neighbour hood plan should accommodate the artists in new studio premises in Rye when the centre closes for redevelopment.</p>	<p>Amend policy on P41 and 59/60 and Policy B3 to reflect:</p> <p>Dropping the requirement for petrol station and convenience store.</p> <p>On B3 and H7, provide alternative facility for the RCC (Use E or F1 use) along with at least six C3 dwellings.</p>
--------	---	---	--

		It is also a great pity that we will lose the important performance space (the old gym) which is another great asset to our community much utilized in recent years and improved as a venue ...	
C1 - 8	Resident from Church Square , Rye	Consider registering the Methodist Church as an Asset of Community Value, to reflect a proposal for the site to be taken on by a community group for community purposes.	Amend text on P67 and Policy I1 on P69
C1 - 9	RNP Coordinator	Include Sussex Outreach support, Rye youth club (RYZONE) and FAIR in the infrastructure section.	Amend Policy I1 on P69
C1 - 10	RNP Coordinator \RDC	Three minor map changes are proposed: AONB to AONL Add the allotments to the policy summary map Make two minor amendments to the development boundary as set out in the HELAA	Amend images on P73 and P121
C1 - 11	RNP Coordinator	As at February 2024, all new developments in England for 10 or more homes have to provide a 10% biodiversity net gain, with the same rules applying to small sites from April 2024. In England, BNG is mandatory under Schedule 7A of the Town and Country	Need to reinforce policy and identify land for BNG, such as the Strategic Gap.  Add text to cover BNG P77 – Policy E1



		Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).	
C1 – 12	RNP Coordinator	Consider more planting	Add policy text to P81 Policy E2
C1 - 13	Historic England Business Officer London & South East Region   East & West Sussex 25 Dowgate Hill, London, EC4R 2YA	<p>Reflect the comments in this response by the RNP Coordinator.</p> <p>The plan has been in operation successfully for 5 years, hence our "light touch" review.</p> <p>RNP responds to comments as below.</p> <p>We have considered the historic environment in some detail, as you note, but of course we are keen to reflect any recent guidance.</p> <p>We have looked closely at the emerging NPPF and our emerging Local Plan ( Rother District) and the latter has already screened our draft.</p> <p>As an "Antient" town in the Confederation of the Cinque Ports we have a full conservation appraisal and take great care to conserve the historic architecture of our unique town.</p> <p>We have asked Rother DC to contact ESCC to ensure that the local archaeological advisory service provide advice.</p> <p>The Rye NP reflects the need for quality design with a sense of place. To help</p>	Consider strengthening Policy E3 on P85

		<p>local planning, the Plan describes three zones which categorises the differing architecture.</p> <p>We seek advice on Local Green Spaces. We have 14 listed in the plan but the Examiner in 2019 wanted more evidence for them to be categorised as LGS, which we are considering.</p> <p>When we drafted the original 2019 plan we did not have any ACVs but we have just identified one and are considering the evidence to include it.</p> <p>We know the CIL rules and are watching to see what changes the new government makes.</p> <p>Traffic and pollution is a concern as the A259 cuts through the town. We will consider this further.</p>	
C1 - 14	Member of Public to RNP Coordinator	EVCP policy should be strengthened for all new developments and public areas.	Add Policy E4 on P87
C1 - 15	RNP Coordinator	The consultation document is updated.	First draft (P 115) enclosed with reviewed version
C1 - 16	<p>Natural England</p> <p>From: SM-NE-Consultations (NE)</p> <p>&lt;<a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>&gt;</p>	<p>We strongly recommend using the <a href="#">SSSI Impact Risk Zones</a> (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives</p>	Add to

	Officer Natural England County Hall Spetchley Road Worcester WR5 2NP	<p>instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.</p> <p>Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.</p> <p>For further information on the Discretionary Advice Service see <a href="#">here</a> For further information on the Pre-submission Screening Service see <a href="#">here</a></p>	
C2 – 16 14 Jul 25	Natural England From: SM-NE-Consultations (NE)	We strongly recommend using the <a href="#">SSSI Impact Risk Zones</a> (SSSI IRZs) to decide when to consult Natural England on development proposals that might	

	<p><a href="mailto:&lt;consultations@naturalengland.org.uk&gt;">&lt;consultations@naturalengland.org.uk&gt;</a></p> <p>Officer Natural England County Hall Spetchley Road Worcester WR5 2NP</p>	<p>affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.</p> <p>Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.</p>	
C1 - 17	Southern Water Strategic Development Worthing	(1)Southern Water notes that this objective 5 Page 22 enhances the general policy direction in the draft Neighbourhood Plan along the lines of: <i>taking account of flood risk and coastal change through development design (as</i>	Reflect proposals in text

		<p><i>well as location); stronger integration of sustainable drainage solutions, to help minimise and control surface water run-off, provide flood storage capacity and improve habitat; incorporating green infrastructure to help reduce climate change impacts such as flood risk and the overheating of urban environments</i></p> <p>Our responses to this Regulation 14 consultation request additional content in places..... Over time, the expansion of urban settlements as well as ‘urban creep’ (home extensions, conservatories and paving over front gardens for parking) have incrementally added to the amount of rainwater entering sewers, resulting in increased releases from storm overflows. As stated in Water UK’s 21st Century Drainage Programme;</p> <p><i>“The country’s built environment is constantly changing and “urban creep” – home extensions, conservatories and paving over front gardens for parking – can all add to the amount of water going into our sewers and drains. Green spaces that would absorb rainwater are covered over by concrete and tarmac that will not. In fact, studies show that “urban creep” results in a larger</i></p>	
--	--	---	--

		<p><i>increase in predicted flooding than new housing, because it adds more rainwater to these systems'.</i></p> <p>(2)We request the following changes to Policy H3, section (e) so that it reads in full:</p> <p><i>A site specific flood risk assessment demonstrates that the residential development is safe for the lifetime of the development incorporating appropriate flood resilient and resistant measures including safe access and escape routes where required and mitigation by a SUDS for surface water. In particular:</i></p> <ul style="list-style-type: none"> <li>• <i>SuDS measures should be designed to take appropriate account of local conditions. These should include reducing water consumption using water re-use measures including rainwater harvesting, surface water harvesting and/or grey water recycling systems.</i></li> <li>• <i>existing flow routes and drainage features within the site should be identified and preserved eg ditches, seasonally dry watercourses, historic ponds.</i></li> </ul>	
--	--	--	--

		<p>(3)Policy H4, Rock Channel Site A, page 35 Policy H5 &amp; H6, Winchelsea Road (East) and (West) pages 37 &amp; 39 Policy H7, Former Freda Gardham School, page 40  Policy H8, Former Lower School Site, page 42  Southern Water is the statutory water supplier and wastewater undertaker for Rye. We would strongly support the inclusion of additional sustainable design principles throughout these policies, in particular the addition of sustainable urban drainage considerations. We have detailed our reasons for this request in our response to Policy H3, but repeat these below for your ease of reference. This request is also in line with paragraphs 4.38, 4.39, 4.74 and 4.76 of the Neighbourhood Plan.</p> <p>(4)We request the following additional wording is included in Policies H4, H5, H6, H7 and H8:</p> <ul style="list-style-type: none"> <li>• <i>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</i></li> </ul>	
--	--	---	--

		<p><i>water harvesting and/or grey water recycling systems.</i></p> <ul style="list-style-type: none"> <li>• <i>Existing surface water flow routes and drainage features within the site should be identified and preserved eg ditches, seasonally dry watercourses, historic ponds.</i></li> </ul> <p>(5) Policy H4, Rock Channel Site A, page 35 Policy H6, Winchelsea Road (West) page 39 Policy H8, Former Lower School Site, page 42 Southern Water is the statutory water supplier and wastewater undertaker for Rye. We also request please the following wording is included in these policies: <i>Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</i></p> <p>(6)We therefore ask that paragraph 4.42(d) be updated to read: <i>Southern Water will be encouraged to work with partners to ensure that the sewage system can work with the proposed new development.</i></p>	
--	--	--	--



		<p>(7) Please could we therefore ask that you update paragraph 4.44 to read:  <i>New development should include sustainable drainage and minimise pollution. SuDS are more sustainable than traditional drainage methods because they...etc</i></p> <p>(8)Policy F1 Reducing Flood Risk  Southern Water is the statutory water supplier and wastewater undertaker for Rye. We strongly support the use of sustainable drainage measures across all development and ask this be clearly reflected in Policy F1 for the reasons detailed below. This request is also in line with paragraphs 4.38, 4.39, 4.74 and 4.76 of the Neighbourhood Plan. We request the following wording changes to the final paragraph of Policy F1:  <i>All new development should include sustainable drainage and minimise pollution. All design to cope with flood risk will take full account of the detailed technical guidance as set out in the Flood Risk and Coastal Change section of the Planning Practice Guidance.</i></p>	
--	--	---	--

		<p>(9)Requests for corrections to paragraph 4.65</p> <p>Southern Water is the statutory water supplier and wastewater undertaker for Rye. We explain further the difference between local sewage network capacity and sewage treatment capacity below, and make related requests for wording changes to help make this clear in the Plan.</p> <p>We request the following wording changes to this paragraph for clarity please:</p> <p><i>Developers should liaise with utility providers at an early stage (pre-application) to identify any network capacity issues and how to overcome these.</i></p> <p><i>Any necessary improvements to wastewater treatment infrastructure Southern Water manages over the medium to long-term by monitoring a range of factors, undertaking Drainage and Wastewater Management Plan studies, and making related investment proposals to Ofwat (the water industry regulator) through the 5-year business planning process for the industry.</i></p>	
--	--	--	--

		<p>(10)Policy E1 . We request wording is added to the second paragraph so that it reads:  Outside the Development Boundary, development will be restricted to that for which a countryside location is necessary or which accords with other specific Development Plan Policies <i>except in very special circumstances such as for essential utilities infrastructure, where no reasonable alternative sites are available.</i></p> <p>(11)Please also note, for your information, that we could not find the 'Note 51' anywhere in the footnotes to the Regulation 14 draft of the Plan.</p> <p>(12)Policy E2 Green Infrastructure page 81  Southern Water is the statutory water supplier and wastewater undertaker for Rye. We would strongly support the addition of multi-functional green infrastructure wording to this policy. We explain our reasons in full below, and this is also in line with paragraph 4.85 of the Neighbourhood Plan.  We request wording is added to the first paragraph and to section (b) of the Policy, so that these sections will read:</p>	
--	--	---	--

		<p>To protect and encourage the provision of <i>multi-functional</i> green infrastructure:</p> <p>...</p> <p>b) Where practical, development proposals should include improvements to local green infrastructure, particularly to improve connectivity for people and habitats, <i>and to mitigate against the increasing risk of flood brought by climate change.</i></p>	
C1 - 18	ESCC		
	<p>East Sussex County Council Communities, Economy &amp; Transport Infrastructure Planning &amp; Place Team <a href="mailto:strategicplanning@east-sussex.gov.uk">strategicplanning@east-sussex.gov.uk</a></p> <p>Head of Planning &amp; Environment</p>	<p><b>EAST SUSSEX COUNTY COUNCIL RESPONSE, NOV 2024</b></p> <p>The following are officer comments from East Sussex County Council (ESCC) which have been subdivided into the respective disciplines for ease of reference. Where appropriate the specific section, policy or document within the consultation documents has been referred to.</p>	
		<p><b>1. Highways Authority</b></p> <p>The transport challenges identified in the plan are noted and agreed. The objectives are noted and we welcome the inclusion of transport within the detailed objectives 1 to 3.</p>	

		<p>(1)Detailed objective 5 (point 7) – Whilst we welcome the reference to travel and the impacts on climate change, it is recommended that the text is strengthened (see red text) and replaced with ‘Demonstrate how sustainable travel measures will be delivered is addressed both within and link with infrastructure outside of the development to contribute to reducing climate change impacts’.</p> <p>(2)General comment - where walking and cycling is referred to, please also include wheeling throughout the document. The term wheeling refers to people using wheelchairs and mobility scooters and is referred to in the newly adopted East Sussex Local Transport Plan 4 2024 – 2050, in the context of ensuring that infrastructure is inclusive for all users and to ensure alignment with national Department for Transport (DfT) transport policy.</p> <p>(3)Transport underpins many aspirations for the town, though there are only limited opportunities highlighted. It is suggested that information could be included from the emerging Rother Local Plan 2020 - 2040 and specifically draft policies LWL3 &amp; 4 which highlight</p>	
--	--	---	--

		<p>the opportunities for walking, wheeling (people using wheelchairs and mobility scooters), cycling and public transport alongside policies LWL7 Streets for all and also LWL8 Multimodal Parking. These policies are in alignment with the recently approved East Sussex Local Transport Plan 4 (LTP4) 2024 – 2050.</p> <p>(4) Paragraph 4.57 – the aspirations to promote traffic management and the support for vulnerable road users are noted. However in relation to references to High Speed 1 (HS1) services extending to Hastings and Eastbourne via Rye in this paragraph, it is suggested that you cross refer to the East Sussex LTP4 Investment Plan (cross-cutting priority SP03 (<a href="#">4. Investment priorities   East Sussex County Council</a>)) and potential investment C003 (Table A in <a href="#">Appendix A - Short-term priorities   East Sussex County Council</a>)</p> <p>(5) We welcome the priorities for active travel users in moving around Rye. This aligns with the LTP4 movement and place framework (<a href="#">4. Approach, vision, objectives and strategy   East Sussex County Council</a>)</p>	
--	--	---	--

		<p>(6) Paragraph 4.59(b) - Please can the reference to the ESCC Transport Plan 3 be removed and replaced with reference to the East Sussex Local Transport Plan 4, which was adopted by the County Council at its Full Council meeting on 8 October 2024 (<a href="#">Local Transport Plan 4   East Sussex County Council</a>).</p> <p>(7) Paragraph 4.60 – Please insert the red text to the following sentence ‘Such connectivity encourages residents and users to walk, wheel and cycle more and use the private car less’.</p> <p>(8) Paragraph 4.61 – It is suggested that the list ‘a to d’ should be revised and shown in the following hierarchical order to ensure alignment with the East Sussex LTP4 <a href="#">User hierarchy based on movement and place function</a>.</p> <ul style="list-style-type: none"> <li>○ •</li> <li>Pick-up point for any group walking parties and any “school walking trains”.</li> <li>○ •</li> <li>Bus stops directly linking to local transport interchanges and other local community hubs;</li> <li>○ •</li> <li>Electric car and bike charging points, with secure storage;</li> <li>○ •</li> </ul>	
--	--	---	--

		<p>Vehicle parking.</p> <p>(9)It is suggested that the East Sussex LTP4 2024 - 2050, and the East Sussex modal strategies (Local Cycling &amp; Walking Infrastructure Plan, Bus Service Investment Plan, Electric Vehicle Charging Strategy and the emerging Rail &amp; Freight Strategy), are referenced within the opening section - Connectivity and Sustainable Transport - as the aspirations for the parish are aligned with the aspirations of the East Sussex LTP4 Strategy and Investment Plan.</p> <p>(10)Policy T1: Connectivity and Sustainable Transport - Note and welcome the transport hub on Station Approach, active travel for short trips to access local amenities, improving active travel connections and links, and cycle parking.</p> <p>1.13</p> <p>(11)Paragraph 5.2 – Suggest reference to East Sussex LTP4 2024 – 2050 at the end of this paragraph to highlight that these aspirations are in alignment with this document.</p> <p>(12)Paragraph 5.6 – It would be helpful to understand how you wish to inform</p>	
--	--	---	--



		<p>visitors prior to their arrival at Rye about green tourism opportunities and how these can be accessed sustainably.</p> <p>(13)Paragraph 5.9 – it is suggested that reference to LTP4 and the following Investment Plan priorities should be made here:  – strategic priority SP01, local priority LP01, and cross-cutting priority CP03  <a href="#">Appendix A - Short-term priorities   East Sussex County Council</a> - potential investment S002, S015, L029, L032, C003, L049, L050</p> <p>(14)Community Aspiration 11: Improved road signage - Consideration has been given to the importance of improving access within the town. The use of wayfinding and signage is supported where appropriate, and any site assessments should consider the local street environment and be sensitively located where a clear need has been identified.</p> <p>(15)Community Aspiration 15: Rail connectivity - Please can you consider referencing alternative modes of travel to the car to enable access to the railway station, i.e. walking, wheeling, cycling and the use of buses.</p>	
--	--	---	--

		<p>(16)Community aspiration 16: Rye and Camber Railway - Whilst we welcome further suggestions from the local community in relation to opportunities to improve travel to, from and around Rye please note that this is not included within the LTP4 Investment Plan.</p> <p>(17)Whilst there are ambitions 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 – given the bus network and availability of Flexibus (<a href="#">Flexibus   East Sussex County Council</a>) in the area, and the connections to local neighbouring communities and intra-urban links (e.g. to Hastings). Therefore, it is recommended that reference to this is included.</p>	
		<p><b>2. Education</b></p> <p>(18)The housing envisaged in Rye in the plan period is unlikely to put much additional pressure on school places in the area. Rye Community Primary School has reduced its Published Admissions Number (PAN) in recent years, but the physical capacity remains</p>	

		<p>in place and can be brought back into use should there be a need in future years. Rye College is under capacity and is unlikely to see significant pressure on places over the plan period.</p> <p>(19)For early years, the situation is tighter, with shortfalls possible as take-up of the expanded offer gradually increases.</p> <p>(20)We note Community Aspiration 19 – Education on page 108, which states: ‘To encourage and support the expansion and enhancement of education facilities in Rye, consulting East Sussex County Council as required’. It is worth pointing out that ESCC would lead on any expansion of education facilities, should that be necessary to meet demand, in accordance with our statutory duties.</p>	
		<p><b>3. Public Health</b></p> <p>(21)Whilst it is acknowledged that many of the policies within the Rye Neighbourhood Plan (RNP) will have possible benefits on health and wellbeing, the plan would be greatly strengthened by emphasising the links</p>	

		<p>and opportunities for ‘planning for health and wellbeing’. This means articulating health and wellbeing as a key priority and outcome of healthy design and ‘healthy and sustainable placemaking’ to enable healthy lifestyles and opportunities for healthy lives. The RNP often does not acknowledge the health and wellbeing benefits and the importance of development proposals maintaining and improving the health and wellbeing of the population to reduce health inequalities and create opportunities for creating health equity and prosperity as well as healthy and sustainable places.</p> <p>For context on understanding the built and natural environment and its links to health, please refer to the Health Map (Barton and Grant, 2006) that is based on the role of neighbourhood and planning: <a href="#">Barton and Grant Health Map</a>. This is particularly important as it will acknowledge the links between achieving healthy outcomes for people and place through the built and natural environment, the links between people and achieving sustainable outcomes, ‘nature for health’, ‘planetary health’, ‘ageing in place’ and climate change adaptation for example. The Health Map can be used to demonstrate how</p>	
--	--	---	--

		<p>population health and wellbeing is impacted not only by individual behaviour, but by the wider determinants such as those within the built and natural environment.</p> <p>(22)The RNP refers to the emerging Rother Local Plan 'Live Well Locally' priority of cultivating healthy, sustainable, and inclusive communities that should be incorporated more fully within the plan to support and enable good health and wellbeing and healthy lifestyles.</p> <p>A useful reference document is the Town and Country Planning Association's 'Reuniting Health with Planning in promoting health communities' that can be found in this link: <a href="#">TCPA Reuniting Health with Planning in promoting healthy communities</a> along with the Royal Town Planning Association's publication 'Mental Health and Town Planning' that includes reference to the built environment: <a href="#">RTPI Mental health and Town Planning</a> In addition, the following documents contain contextual information on an ageing society: <a href="#">Ageing Better - State of Ageing 2023 Summary</a></p>	
--	--	--	--

		<p><a href="#">Chief Medical Officer's Annual Report 2023 - Health in an Ageing Society</a> and links to loneliness: <a href="#">East Sussex JSNA Annual Public Health Report 2022-23 Connecting People and Places</a></p> <p>○ •</p> <p>Other useful documents to refer to, include the Chief Medical Officers annual reports on health in coastal communities <a href="#">Chief Medical Officers Annual Report on Health in Coastal Communities 2021</a> and on air pollution <a href="#">Chief Medical Officer's Annual Report on Air Pollution 2022</a></p> <p>(23)The following comments therefore highlight the links to health and wellbeing benefits and where the RNP can further strengthened these. Suggested additional text is shown in red text.</p> <p><b>Section 2 – The Vision and Objectives</b></p> <p>The Vision and Objectives section need to integrate health and wellbeing issues more holistically and comprehensively. It is suggested that the Strategic Objective includes reference to ‘maintaining and enabling healthy lifestyles’:</p> <p>“To plan a coherent and sustainable development of Rye with the aim of improving the economic and social well-</p>	
--	--	--	--

		<p>being of the community, and to maintain and enable healthy lifestyles,...”</p> <p>It is recommended the following points be incorporated within the Detailed Objectives:</p> <ul style="list-style-type: none"> <li>○ •</li> <li>Maintain and improve access to nature and to play and recreation increasing physical activity and providing health and wellbeing benefits such as positive mental health.</li> <li>○ •</li> <li>Maintain and improve social cohesion and reduce social isolation and loneliness.</li> <li>○ •</li> <li>Maintain and improve food security through access to healthy food, and growing spaces.</li> <li>○ •</li> <li>Lifetime and adaptable homes that meet the needs of the aging population.</li> <li>○ •</li> <li>Maximising opportunities for healthy design principles.</li> <li>○ •</li> <li>Active travel.</li> <li>○ •</li> <li>Healthy lifestyles and mental health.</li> </ul> <p><b>Section 3 – The Character of Rye</b></p>	
--	--	--	--

		<p>(24) This section gives a general summary of Rye and includes an overview of the population characteristics. To support and reinforce the health and wellbeing aspect of policies within the RNP, it is suggested that current health intelligence data on population demographics is used to show the trends, key issues, and health inequalities in the parish in this section. For example, paragraph 3.2 could expand the breakdown of population by all ages by setting it out in a table, and to set out the proportions of the population in good or bad health, that can be compared with the District and nationally to build up the profile of the health of parish residents. General information can found in the East Sussex State of the County 2024 report: <a href="#">East Sussex State of the County 2024</a></p> <p>In addition the Rother District profile within East Sussex Joint Strategic Needs Assessment (JSNA) in the following link is a useful source of local health and inequalities data to add context to Section 3: <a href="#">East Sussex JSNA Rother District Profile</a>. Links to parish data can be found via the county's East Sussex in Figures resource: <a href="#">East</a></p>	
--	--	---	--



		<p><a href="#">Sussex in Figures</a> and in detailed information on Rother in Fingertip's Public Health profiles: <a href="#">Fingertips Public Health Profiles: Rother</a>.</p> <p>(25)The Plan needs to recognise that climate change is the biggest threat to public health and there are health risks and impacts to the human population, across a range of development areas, especially within vulnerable groups such as young children and older people. Recent information to help understand these impacts can be found in the following UK Health Security Agency report on <a href="#">Health Effects of Climate Change (HECC) in the UK 2023</a> The Met Office produced a Climate Projections Explorer that provides local climate information for Local Authorities in the UK at district level for climate risk assessments, developing adaptation plans and for building climate resilience: <a href="#">Met Office's Local Authority Climate Service</a>.</p> <p><b>General comments</b></p> <p>(26)The RNP should demonstrate that health and wellbeing is at the forefront of thinking behind the Plan by strengthening links to opportunities for</p>	
--	--	--	--

		<p>active travel, social cohesion, and planning for all age groups. If there is no specific policy for Health and Wellbeing, where these issues could be covered, then stronger wording should pick up these elements within relevant policies to ensure there is a strong health and wellbeing thread through the Plan. The RNP should also strengthen references to climate change adaptation and mitigation by including benefits to human health alongside planetary health.</p> <p><b>3.12 Housing</b></p> <p>(26)The proposed policies should consider the effects of climate change by ensuring that homes are well designed, resilient, and consider health and wellbeing of residents. In light of the ageing population, and to support the justification for the proposed housing policies, and the need to provide specialist and adaptable accommodation, suggest reference to the following documents that contain contextual information on an ageing society: <a href="#">The role of home adaptations in later life</a> Lifetime homes: design and standards - <a href="#">Lifetime Homes: Design and Standards</a></p>	
--	--	--	--

		<p>It is suggested that reference is made to the Housing our Ageing Population Panel for Innovation (HAPPI) principles as well as including the guidance produced by the Royal Town Planning Institute - <a href="#">Dementia &amp; Town Planning, RTPI 2020</a>. Also to reflect older people's needs, reference could be made to the East Sussex Dementia Joint Strategic Needs Assessment <a href="#">Dementia JSNA (eastsussexjsna.org.uk)</a></p> <p><b>High Quality Design and Conservation of the Historic Built Environment</b></p> <p>(27)Policy D1 High Quality Design - the policy and supporting text should refer more to the health and wellbeing benefits of good design by both physical through to being well connected and accessible, and mental health and wellbeing through creating attractive safe places. The design of developments should maintain and improve social cohesion through good connection with existing communities, where layout and movement avoid physical barriers and severance and encourages opportunities for social interaction. Safe pedestrian access should be for all ages and abilities.</p>	
--	--	---	--

		<p>Reference should also be made to the 'Active Design' Guidance principles that create places which enable active and healthier lifestyles in this link: <a href="#">Sport England Active Design Guidance</a> along with 'Building for a Healthy Life' design guidance for both housing and neighbourhood design: <a href="#">Homes England Building for a Healthy Life</a></p> <p><b>Reducing Flood Risk</b></p> <p>(28)The supporting text and policy should acknowledge the health effects of flooding as one of the health risks of climate change. Building local climate resilience within communities is important to address health effects such as mental health.</p> <p><b>Enterprise and Employment</b></p> <p>(29)To support the policies in this section, the health and wellbeing benefits of a prosperous local economy should be emphasised in the supporting text and policies. This includes contributing to improving mental health and wellbeing and reducing health inequalities for the local population.</p> <p><b>Transport</b></p>	
--	--	--	--

		<p>(30)References in the RNP to the importance and improvement of walking and cycling infrastructure are welcomed. To strengthen the plan and policies there should be more detail on the physical health and mental wellbeing benefits of increasing walking and cycling, which should also include wheeling. Increasing opportunities for walking, cycling and wheeling has benefits to health and wellbeing from enabling more physical activity through active travel, reducing air pollution with benefits both for population health and the environment. It also has the potential to improve connectivity for all to key services with opportunities for interaction reducing social isolation. The supporting text and policy need to stress the importance of inclusivity, routes should be accessible for all ages and abilities.</p> <p>Specifically, Policy T1 should include the following additions:</p> <p>Any development is located close to community facilities and other key services to enable access to these essential amenities by walking, wheeling and/or cycling</p>	
--	--	--	--

		<p>The design of new development where practical makes the most of opportunities to improve walking, wheeling, cycling facilities in and around the site for all, including linking with other strategic routes such as the National Cycle Network and the Greenway initiative.</p> <p><b>Infrastructure and Community Facilities</b></p> <p>(31) Policy I1 aim to increase and retain essential infrastructure is supported. The health and wellbeing benefits should be stressed in the supporting text both the physical and mental health impacts. Such facilities as outlined in the supporting text and Policy I1 support and enable healthy lifestyles, help to maintain and improve the health and wellbeing of residents, create attractive environments, reduce social isolation and create social cohesion.</p> <p><b>Green Infrastructure</b></p> <p>(32)References in the RNP to the importance of green infrastructure for local recreation and for the quality of life benefits for local communities is welcomed however the health and</p>	
--	--	---	--

		<p>wellbeing benefits of green infrastructure should be further elaborated to strengthen the supporting text and policy justification. Access to a range of quality green and blue spaces is beneficial to both physical and mental health, increasing physical activity and wellbeing. Recreational and play facilities should cater and be accessible for all ages, genders and abilities.</p> <p>(33)It is suggested regard in made to guidance from Make Space for Girls that is provided in this link: <a href="#">Safer Parks for Women and Girls Guidance</a>. The reference to food growing and allotments is supported but should stress the health and wellbeing benefits from physical activity, healthy eating and for mental health through increasing interaction and creating social cohesion.</p> <p>It is recommended that health and wellbeing related criteria are added to the list in Paragraph 4.85:</p> <p>Sustainable transport and active travel routes;</p> <p>Opportunities for physical activity through recreation, play facilities and active travel.</p>	
--	--	---	--

		<p>Food growing and healthy eating.</p> <ul style="list-style-type: none"> <li>○</li> <li>•</li> </ul> <p>Physical and mental health benefits.</p> <p>(34) Paragraph 4.87 should include the following addition criteria:</p> <p>Increases access for all to nature.</p> <p>(35) Policy E2: Green Infrastructure should include the following addition:</p> <p>Where practical, development proposals should include improvements to local green infrastructure, particularly to improve connectivity for people of all ages and abilities and habitats.</p> <p><b>Policy E3 Heritage and Urban Design</b></p> <p>(36) The policy supporting text could include the mental health and wellbeing benefits of protecting quality built and historic environments.</p> <p><b>Renewable and Low Carbon Energy</b></p> <p>(37) The policy and supporting text should refer to the multiple benefits of health and wellbeing and mitigating the</p>	
--	--	---	--



		<p>effects of climate change on promoting these energy sources.</p> <p><b>Section 5 – Community Aspirations</b></p> <p>(38)The ‘Health’ aspiration should be renamed to ‘Health Infrastructure’ to make it clear that it refers to the community’s need for additional local medical services.</p>	
		<p><b>4. Rights of Way</b></p> <p>(39)Para 104 of NPPF states ‘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’. Protecting and enhancing existing public rights of way, and creating new routes, would contribute to the aims of Planning Policies, B2e, E2 T1c and Community Aspirations CA3 and CA4.</p> <p>(40)Policy T1e: It should be noted that where ‘cycling will be encouraged on a proposed route alongside the Royal Military Canal’, this is likely to require the landowner’s permission. The</p>	

		<p>provision of future maintenance of the route, suitable path furniture, as well as adequate surfaces and path widths would also be necessary to allow access for cyclists. (Please also see paragraph 6.6, where this is re-iterated in more detail.)</p>	
		<p><b>5. King Charles III England Coast Path (KCIII ECP) National Trail Southeast Section</b></p> <p>(41) Paragraph 4.15 (page 34) - It is requested that the full name of the trail is used – King Charles III England Coast Path.</p> <p>Policy H4: Rock Channel (page 35) - This policy is supported, but it is requested that the full name of the trail is used – King Charles III England Coast Path.</p> <p>Policy H5: Winchelsea Road [East Side] (page 37) - This policy is supported, but it is requested that the full name of the trail is used – King Charles III England Coast Path.</p> <p>Policy D1: High Quality Design (page 46) - This policy is welcomed and supported.</p>	

		<p>(42)Policy B2L Supporting Rye as a Visitor Destination (page 58) - This policy is welcomed and supported.</p> <p>(43)Policy T1: Connectivity and Sustainable Transport (page 63) - It is requested that the full name of the trail is used – King Charles III England Coast Path.</p> <p>(44)It is also requested that the following criteria is added to this policy text:  ‘Enhancements to the safety, amenity or accessibility of the King Charles III England Coast Path National Trail, including links with surrounding Public Rights of Way and local communities.’  Given that landowner agreement will be required to establish new cycle access rights and sections of the KCIII ECP may not be suitable for a shared access path e.g. limited width available, consideration should be given to rewording Policy T1-e. It is suggested that the following wording is considered:  ‘Where appropriate, efforts should be made to establish new cycle access along the Royal Military Canal and the King Charles III England Coast Path.’</p>	
--	--	--	--

		<p>(45)Figures 20 - 22 (pages 64/65) - It is requested that a new map is inserted after Figure 22, highlighting the proposed alignment of the King Charles III England Coast Path (KCIIIIECP). While the exact route has not yet been confirmed, the National Trail should be highlighted in the plan as it is a key component of the access network, which will provide valuable opportunities for active travel and outdoor recreation. The proposed alignment of the KCIIIIECP can be viewed and downloaded here: <a href="#">King Charles III England Coast Path from Rye Harbour to Camber Sands (EBC8): Natural England's proposals - GOV.UK</a></p> <p>(46)Green Tourism (Page 91) - It is requested that the following paragraph is added to the section to highlight the benefits and opportunities of the KCIIIIECP:  'The King Charles III England Coast Path National Trail (KCIIIIECP) will be a continuous, easy to follow, well-maintained walking route, allowing people to walk around the whole English coast. The KCIIIIECP is a national asset that will bring health and wellbeing benefits to local people and visitors. The trail will improve existing coastal paths</p>	
--	--	--	--

		<p>and create new access where there was none before, enabling people to experience, recognise and value the benefits of our environment.'</p> <p>(47)Community Aspiration 4 – Green Tourism (Page 92) - It is requested that reference to the KCIIIECP is added to this statement: 'To encourage Green tourism and leisure, including support for the nearby Rye Harbour Nature Reserve and King Charles III England Coast Path National Trail.'</p> <p>(48)Paragraph 5.28 (page 104) - It is requested that the full name of the trail is used – King Charles III England Coast Path.</p> <p>(49)Community Aspiration 17: Strand Water Project (page 105) - Given that the proposed new ways across the River Rother could potentially improve the character and directness of the KCIIIECP, this community aspiration is supported.</p>	
		<p><b>6. Culture and tourism</b></p> <p>(50)We welcome Policy B2 and Community Aspirations 2, 3 and 4 in that they support the East Sussex, Brighton</p>	

		& Hove and West Sussex Local Visitor Economy Partnership Visitor Economy Growth Plan.	
		<p><b>7. Flood Risk</b></p> <p><b>General Comment</b></p> <p>(51)The predominant flood risk for Rye is from tidal and fluvial sources and therefore a matter for the Environment Agency to comment upon.</p> <p>However, as the Lead Local Flood Authority (LLFA), the County Council is concerned with the management of risk from surface water, groundwater, and ordinary watercourses. These can, individually and in combination lead to significant flooding. For example, the low-lying land around the Citadel is in an area where groundwater is less than 3m from the surface. This will be influenced by the tidal nature of the rivers flowing through the town and by prolonged rainfall events. This will affect the ability of land to drain and will inundate surface and sub surface drainage infrastructure. Groundwater can find its way into underground pipe work which in turn leads to surcharging sewers. New development in the town will need to consider the presence of high</p>	

		<p>groundwater when designing drainage strategies. Therefore, groundwater and its impact on localised flooding requires more emphasis in the NP.</p> <p>(52)Figure 13 - Rye Flood Risk displays the undefended main river and coastal risk, but there is no corresponding map showing surface water risk.</p> <p>(53)Paragraph 4.32 - Rather than referring to “downstream SuDS” consider referring to SuDS as ‘managing rainfall where it lands’</p> <p>(54)Policy F1 does not acknowledge that all sources of flooding should be considered when testing sites and therefore sole reference to FZ 2 and 3 needs to be reviewed. Please refer to the need to consult with both the EA and the LLFA when preparing FRAs.</p> <p>(55)Finally, be aware that the Environment Agency will begin publishing its updates to flood and coastal erosion mapping early next year (National Flood Risk Assessment – or NaFRA 2). This mapping will come in a different format than the current set of maps and therefore will require changes to planning policy guidance. This will</p>	
--	--	---	--

		have implications for the Neighbourhood Plan, and it will be for the Environment Agency to advise on what the transitional arrangements are.	
		<p><b>8. General Comments</b></p> <p>(56)Policy H7: Former Freda Gardham School Site - please can the criteria for non-residential property be widened? At the moment, the wording still includes provision for a petrol station but it is not clear if there is a still a need for this and/or if any recent work has been done to assess demand for such.</p> <p>(57)Could a provision be made for a convenience store (if there is demand)/employment use and community space? This addition will provide a small number of jobs for the local area, in addition to re-provision of the community space that will be lost when a development scheme comes forward here.</p>	
C1 - 19	<p>– <a href="mailto:PlanningSE@nationalhighways.co.uk">PlanningSE@nationalhighways.co.uk</a>.</p> <p>Spatial Planner Operations National Highways   Bridge</p>	<p><b>National Highways Ref:</b> NH/24/08350</p> <p>In the case of Rye, our interest relates to the A259 trunk road which runs east-west through Rye.</p>	Comments incorporated



	<p>House   1 Walnut Tree Close   Guildford   Surrey   GU1 4LZ</p> <p><b>Tel:</b> 0300 470 1064</p> <p><b>Web:</b> <a href="http://nationalhighways.co.uk">nationalhighways.co.uk</a></p>	<p>We have the following comments on the Reviewed Rye Neighbourhood Plan 2016 – 2040 Regulation 14 document:</p> <p>We note that the Rye Neighbourhood Plan allocates sites to provide at least 218 new dwellings to 2040 in the following policies.</p> <p>H3 - Tilling Green School at least 20 dwellings  H4 - Rock Channel at least 30 dwellings  H5 - Winchelsea Rd East at least 10 dwellings, employment floorspace  H6 - Winchelsea Rd West at least 20 dwellings, employment floorspace &amp; potential convenience store  H7 &amp; B3 – Freda Gardham School at least 30 dwellings &amp; potential convenience store/ petrol filling station  H8 – Lower School at least 50 dwellings</p> <p>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</p>	
--	--	---	--

		<p>at planning application stage. We are content that we can deal with any site specific matters as part of the planning application process. We encourage early engagement with all developers, and especially for the sites in close proximity to the A259 ie H4, H5, H6, H7 and B3.</p> <p>We note the community aspirations and welcome discussion with people who have ideas for our network.</p> <p>Policy H4 (b) 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. All agreed works on the A259 including new or improved accesses will require the developer to enter into a Section 278 legal agreement with National Highways.</p> <p>I assume the reference in paragraph 4.24 to the proximity of allocated site H8 to the A259 is a typo and should be "B2089".</p> <p>The document contains some references to "Highways England" (for example paragraph 5.9 and Page 119 Statutory Consultees) which should be</p>	
--	--	--	--

		<p>amended to “National Highways” in line with our change of name.</p> <p>National Highways have no objection to the Neighbourhood Plan and look forward to being consulted further as the Plan progresses towards Adoption.</p>	
C1 - 20	Rye Chamber of Commerce	<p>Representations from Rye Chamber of Commerce</p> <p>The Rye Neighbourhood Plan is a superbly well researched and thought through plan with evidence guiding conclusion rather than sentiment or a desire for compromise.</p> <p>Its conclusions on development opportunities to meet housing needs make absolute sense and maintain the critical character of Rye while avoiding sprawl – itself a risk both to habitat and from environmental risk (mainly flooding). So it’s extremely well argued.</p> <p>A few points that are of particular importance to the business community in Rye:</p> <ul style="list-style-type: none"> <li>• Second homes and buy to lets continue to be a concern for the</li> </ul>	All noted and response sent

		<p>town, particularly their impact on both tourism, and also on affordable housing. We are mindful that RDC has, this month, agreed to undertake a study into second homes and Airbnbs in Rye – the task and finish group will report back to RDC by June 2025 and Rye Chamber will be given the opportunity to contribute to that study. We believe this data and information should be considered in future relevant planning applications.</p> <ul style="list-style-type: none"> <li>• The next generation of young people in Rye need to be able to live and work in the town. That means both affordable housing and starter homes must be a critical inclusion in all proposed developments.</li> <li>• The RNP talks of the need to encourage businesses that help maximise Rye as a destination town. This is vital, but some considerable challenge in an environment where there is no investment from the government in tourism. Tourism remains a non statutory spend. Our tourism attractions in town are volunteer run and therefore</li> </ul>	
--	--	--	--

		<p>vulnerable. Rye has an over dependence on volunteers that make future proofing our tourist assets very difficult.</p> <ul style="list-style-type: none"> <li>• The RNP also talks of the need to encourage markets, festivals and events – again this is laudable and one totally supported by the Chamber but a challenge for a town without the tourism budget to create these opportunities. The town is further hampered by not having a central square or covered outdoor space capable of hosting such events in all weathers – making their success very weather dependent, especially in a changing climate. We need to invest in events that increase footfall and dwell time in the town and encourage overnight stays. These are the commercial imperatives of our visitor economy. Future developments should consider this type of outdoor event space provision as an investment opportunity.</li> <li>• All new developments must consider parking and traffic issues. We cannot work to bring visitors and tourists to the town in</li> </ul>	
--	--	--	--

		<p>numbers sufficient to support our businesses and grow our tourism offering, if the infrastructure cannot support them.</p> <ul style="list-style-type: none"> <li>• We need to address the EVCP issue in and around Rye. If power supply is an issue for these – how can we begin to consider the power requirements of the proposed housing developments?</li> <li>• Rock Channel site – the business community would have liked to see this site remain mixed use, rather than just housing, particularly given proximity to the King Charles III footpath which will give access to green spaces and has the potential to be a valued asset for both residents, visitors and tourists to the town.</li> <li>• Freda Gardham site – we support the reclassification of the B3 area so that more flexible use can be considered. EVCP would again be a recommendation.</li> <li>• RNP talks of the cultural offer that Rye has. The town has a rich history of arts and literature which needs to be maintained as part of</li> </ul>	
--	--	---	--

		<p>the vital character of the town. The uncertain future of the Rye Creative Centre is at odds with this. Development must not come at the expense of our cultural offer or indeed our tourism offer. We ask that the Rye Creative CIC recommits to its values and makes clear how they will continue to support and champion the creative community of the town.</p> <ul style="list-style-type: none"> <li>• No plans should come at the expense of the future flood resilience of the town.</li> <li>• Increased focus on BNG is to be welcomed as is greater emphasis on biodiversity for all of our green spaces.</li> <li>• Community Aspiration 3 - to better coordinate the town as a tourism destination. The Chamber works closely with and remains supportive of our DMO – 1066 Country Marketing and hopes that RDC will continue to invest in this as it is the only means through which the town is marketed as a destination. The landscape of DMOs in this country is changing however, and with that in mind Rye Chamber is</li> </ul>	
--	--	---	--

		currently undertaking a feasibility study with a view to the town exploring achieving BID status (business improvement district) this would enable the town's businesses to raise funds for many of the aspirations and goals outlined in the RNP which will help the town to thrive.	
C1 - 21	Councillor	I agree with most of the review especially "all opportunities should be taken to build starter homes for local people. The allocated sites of the former schools at Tilling Green and Freda Gardham present the best opportunities as and when proposals come forward. A Rother District initiative to be welcomed is the newly formed "arms length" Rother Alliance Homes Ltd company". I will be joining the arms length Rother Homes and welcome any opportunities to work together to achieve decent homes for Rye locals however there must be a focussed emphasis on social housing, preferably council housing. One of the issues most frequently raised to me by residents is traffic flow and management around Rye. I'm aware this is a frequent area of discussion and disagreement however a statement of intention to review traffic management	All noted



		<p>and flow would be very welcome by many residents. this could include placement of Noise Cameras to deter the louder motorbikes, addition of pedestrian crossings at key points. A related issue is the encouragement of active travel such as bike lanes that could be developed with ESCC and sustrans. The recent improvement of the Camber route shows how possible this is and how much of a positive impact it can have, I would like to see a connected network of cycle paths and walking tracks around Rye e.g. a cycle path connecting Rye and Winchelsea. Finally, a big thank you to Col Kimber and others involved in putting this together, Rye greatly benefits from your diligence!</p>	
C1 - 22	Citizen of New Winchelsea Rd	<p>Martello Developments announced today its building plans for Rye. These include 26 houses and 19 two-bed apartments in the vital Rye-Rye Harbour strategic gap. The Town Council and RDC are on the record as saying they will preserve this gap.</p> <p>If you build on a strategic gap, it's no longer a strategic gap. Moreover, the land is entirely flood-prone, despite the</p>	All noted

		<p>EA's bank-raising efforts.</p> <p>The town council needs to ensure that the strategic gap must remain untouched.</p> <p>Once all the tourism-related businesses in Rye realise just how badly this could affect their trade — with Rye's appearance as a separate historic town on a hill being.</p> <p>I would hope the Town Council takes notice of what's going to be wholesale opposition to this proposal to destroy our strategic gap and reconsiders what appears to be its support for Martello's plans for this site.</p>	
--	--	---	--

C1 - 23	Silverstone Communications For Martello And RNP Response	<p>A quick round-up of our event (26 Nov) this morning as promised.</p> <p>We had a really good cross section from the Rye business community attend this morning, including the editor of Rye News. It was a good event and we received a warm response to the proposals. Needless to say we have asked all attendees to let us have feedback on how they found the event and I will be happy to share that with you once I've had responses from everyone.</p> <p>We have more engagement planned and there will be further events in the New Year, I look forward to speaking to you again in due course.</p>	<p>Extract from the response:</p> <p>You might not be surprised that two issues were debated at Rye TC last Monday evening</p> <p>(1) Martello's proposal to break the statutory Rye Neighbourhood Plan and emerging Rother Local Plan by considering development on the Rye Strategic Gap (Urban creep; protected biodiversity; flood risk) and</p> <p>(2) the displacement of the well established artist collective under the RCC CIC at the Former Freda Gardham without any realistic plan for relocation.</p>
C1 -24	Rye Councillor	That the Strategic Gap between Rye and Rye Harbour must be defended at	Responded as noted

		all costs, since otherwise it makes a total mockery of all plans and local democracy!	
C1 - 25	RNP Coordinator from ESCC	<p>Extract from meeting between RNP Coordinator and ESCC Staff.</p> <p>The former Freda Gardham is leased by Martello with an option to buy.</p> <p>Planning options for B3 could be treated as a mixed use. The proposal for a petrol station/ convenience store requirement was imposed by Rother DC in 2019, but is now considered "outdated".</p> <p>Tilling Green: Rye Partnership has two leases, one on the Community Centre and one on the old playing field. The latter has been unused as such since 2004 therefore its status as a school facility can be considered as lapsed. However as the green space is an "open space" there would have to be a consultation about development.</p> <p>10% Bio Net Gain would apply to all development sites and gain would have to be provided on site or purchased off site. Calculations are complex!</p>	Noted and reflected in the text.

C1 -26	Rother DC	<p>Extract from RDC Representation:</p> <p>The Rye Neighbourhood Plan (RNP) has been a valid part of the Local Development Plan since 2019 and the on-going commitment of the steering group and Town Council to plan positively in the town is commendable.</p> <p>We have commented on the Review as it has progressed, and we're pleased to see that some of these comments have been taken on board.</p> <p>Our representations below are a more detailed response to the whole Plan. Throughout the RNP, reference is made to the Regulation 18 Rother Local Plan, however it is not always identified as draft. It cannot be relied upon to inform the RNP because at this stage it has very little/ no weight. We recommend that all references to the Regulation 18 Local Plan are either deleted or amended to clarify its draft status. It is a requirement of a NP to be in conformity with the adopted Local Plan, and therefore it would, on most occasions, be advisable to refer to an existing adopted policy rather than any emerging</p>	<p>Extract from initial response. Detailed comments have been considered and reflected in the text.</p> <p>There are some matters that provide specific challenges.</p> <p>First, the points in your 6th paragraph and on H1. While we fully support the ESCC aims to reduce car usage and prioritise other means, there are 2024 realities which mean that any exploration of providing more flexible parking runs counter to the current situation. Rye is a rural community, remote from so many facilities and employment found in a larger urban area. A walk round any of our housing estates</p>

		<p>policy. We are concerned about the RNP period exceeding the Local Plan (LP) period. All other NPs in the district (made and emerging) plan to 2028 only, in line with the current Local Plan period.</p> <p>The Examiner of the Peasmarsh NP changed the proposed plan period to 2028. It is clear from his report (Nov 2023) that the main reason was that he had “little confidence that for the period up to 2039 that the plan will be, for example, delivering the social objective of sustainable development, namely that it is “ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”, because, due to the early stage of Rother’s new Local Plan preparation, for the period beyond 2028, RDC was “not in a position to give the Parish Council a housing number to work to, which is something normally expected by the Secretary of State, as set out in paragraph 66 of the NPPF”. While the preparation of RDC’s new Local Plan has progressed since that time and was published for Regulation 18 consultation in the summer 2024, it still carries very limited weight. Furthermore, having regard to the</p>	<p>today would demonstrate that car and van ownership is significant by necessity. Parking is and has been in at crisis levels at certain times. Up to 1m visitors, 400(?) second homes, people from our "cluster" of villages seeking services, all mean that our 900 public spaces are quickly consumed. With many homes having no on site or on street parking, by increasing density on allocated sites, there would be overflow adding to the problem. We have wrestled with this in the context of CPE, which itself displaces vehicles from the "pay to park" central area to unrestricted "non pay" locations around Rye. I labour this because higher density</p>
--	--	---	--

		<p>Labour Government's increased focus on growth, and specifically housing delivery, and the proposed increase in the Local Housing Need (LHN) figure (detailed in its consultation on "Proposed reforms to the National Planning Policy Framework and other changes to the planning system" in summer 2024), it is likely that RDC will have to do significantly more work in seeking to identify sites for housing, and appropriately maximising densities on sites, before its new Local Plan could be considered suitable for adoption by an Inspector. Consequently, the indicative housing figures within RDC's Regulation 18 draft Local Plan, and the supporting evidence base, cannot be relied upon to reflect the likely figures to be included in RDC's future submission Local Plan, and cannot therefore be appropriately utilised by NPs seeking to estimate their own future need. Therefore, similarly to the situation at the Peasmarsh NP Examination, as RDC is "not in a position to give the Town Council a housing number to work to, which is something normally expected by the Secretary of State, as set out in paragraph 66 of the NPPF", we recommend that the RNP period is reduced to align with the Core Strategy</p>	<p>housing with reduced parking provision would suit developers but not the reality of everyday life in what us a constrained community.</p> <p>Secondly, I note your advice in paragraphs 4 and 5. We will adopt the 2028 alignment with the emerging Local Plan. Given the serious constraints - geography, water, protected biodiversity, Conservation area - on development within our boundary and our aim to retain the character of Rye, your advice about future work on the "growth agenda" and the need for future sites, while maximising housing density will be alarming to many here.</p> <p>Thirdly, points on H7 and B3. We plan to</p>
--	--	---	---

		<p>period, i.e. to 2028, and the Town Council commits to reviewing the Plan again, once the new Rother Local Plan is adopted and RDC is able to supply a housing number for the parish.</p> <p>Turning to the detailed policies, we recommend that the supporting text for Policies H3, H4, H5, H6, H7, H8 should clarify that, in accordance with the Local Transport Plan (LTP4, adopted 2024), East Sussex County Council aims to reduce car usage while prioritising walking, cycling, and public transport.</p> <p>The allocated sites exhibit high accessibility levels, being in close proximity to local services as well as being within a reasonable walking distance of frequent bus and/or rail services. Therefore, all sites should be assessed collaboratively with East Sussex County Council to explore the feasibility of providing flexibility in parking requirements, potentially allowing for reduced parking provision. This could facilitate the achievement of higher housing densities on these sites. Please see you below for our specific comments on each policy.</p>	<p>remove the requirement for a petrol station and convenience store, which was imposed on us by Rother Planners in 2019. We now have the Aldi store in prospect for H6. Having looked closely at EVCP fast chargers we have discovered that supply is an issue across Rye, which, without significant power supply investment, would rule out a public EVCP array on B3.</p>
--	--	---	---



		<p>RNP Policy RDC Comments 6 Reduce Flood Risk (F1)</p> <p>The first bullet point refers to applying the sequential test to all development sites. It should be noted that since the NP was first made, the national requirements set out in the NPPF have changed such that (as per NPPF para 168), 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 sequential approach (as described in NPPF para 167) should be used in areas known to be at risk now or in the future from any form of flooding.” Prior to the changes to the NPPF, the requirement only required consideration of river and sea flood risk when applying the Sequential Test. This means that the sequential test applied previously to development sites may now be out of date and needs to be reconsidered.</p> <p>19 Para 2.3 If these extracts from the draft Rother Local Plan 2020-2040 are</p>	
--	--	---	--

		<p>to be included, they need to be clearly labelled as being from the 'Draft Regulation 18 Version', as currently they carry no weight in decision making and are subject to change as the draft Rother Local Plan progresses.</p> <p>Objective 5 Whilst we support points 1-7 we recommend making sure each point is followed through in policy.</p> <p>P23 Para 3.4, 4th sentence We recommend inserting 'development strategy of the emerging Local Plan'.</p> <p>P24 Figure 4 The reference should include: 'Rother Local Plan 2020-2040 Draft (Regulation 18) version, April 2024'.</p> <p>P25 Paragraph 3.11, last sentence This is not shown in red as an amendment, but the Rother Local Plan policies referenced (HER 1-3) are within the draft Rother Local Plan. If these are to be referred to, then they need to be referenced correctly as draft policies, or, alternatively (and preferably), the adopted Local Plan policies should be referenced instead.</p>	
--	--	--	--

		<p>P27 Housing Some of the figures in the table are confusing and need clearer dates, e.g. what month in 2024? Are the residual/ outstanding figures as of 2019 or 2024? The figures in the penultimate row (“2024 Targets”) should either be removed or heavily caveated that they have no weight and are subject to change, as per comments above.</p> <p>P28 Para 4.2 second sentence We recommend that ‘Rother draft Housing and Economic Land Availability Assessment HELAA (2024)’ is inserted.</p> <p>29 Para 4.4 The tense of this sentence should be amended to reflect the fact that these negotiations took place when the NP was first drafted. We are not aware of further negotiations around the emerging LP target.</p> <p>P30 Policy H1 – Housing Allocations We would suggest the word “brownfield” is deleted as it is unnecessary, and to avoid any potential confusion later on, if any part of those allocated sites were considered not to be brownfield. The policy states that the allocations would provide at least 160 dwellings. However, the table on pg.27/28 states the need is 218 dwellings. We note that the housing numbers on the sites have not</p>	
--	--	---	--

		<p>been increased, despite the sentence in the last row of the table on page 28: “The greater number (13) in the Rother Plan is considered achievable by building higher numbers on sites allocated in the RNP.” Also, is the Town Council confident that all of these sites are still available and achievable? We have concerns about Winchelsea Road East which is in multiple land ownership. We recommend that the proposed housing allocations are reviewed and their densities potentially increased to align with the National Planning Policy Framework (NPPF) requirements for making the most efficient use of land. Additionally, the national design guides emphasize the importance of delivering higher densities through compact forms of development. Specifically, we think that a greater number of dwellings could potentially be accommodated on the allocated sites H4 – Rock Channel and H7 – Freda Gardham School.</p> <p>P31 Para 4.8 It is unnecessary to say “affordable or social housing”, it should just be “affordable housing”. We recommend minor changes to the penultimate sentence to make it clearer: “Policy DHG1 of the adopted Rother Development and Site Allocations</p>	
--	--	--	--

		<p>(DaSA) Local Plan requires, in Rye, the provision of 30% on-site affordable housing on schemes of 10 or more dwellings (or 0.3 hectares or more) to meet the local needs in Rye”.</p> <p>P32 Policy H2: Housing Mix For ease of reading, we would suggest this policy is not split into two parts. With reference to part (c), we think the last sentence could unnecessarily limit the size of 100% affordable housing developments and would suggest it is deleted. Instead, the NP could include criteria by which proposals for 100% affordable housing schemes could be considered. As an example, Policy HOU3 of the draft (Regulation 18 version) Rother Local Plan sets out such criteria, although Policy HOU3 currently has no weight in decision making.</p> <p>P32 Paragraph 4.11 This is not new text and so does not need to be highlighted in red. 3</p> <p>P3 Policy H3: Former Tilling Green School Part (a): This has been amended compared to the current NP which also gives the option of reproviding the community centre before the last dwelling is occupied. I would suggest</p>	
--	--	--	--

		<p>this alternative option is re-included to provide future flexibility. 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. If the NP Group wish for a particular requirement to apply to this site, then it should be made clear.</p> <p>P 37 H5 and H6 use specific planning class such as offices within Use Class E.</p> <p>P40 H7: Former Freda Gardham School “could” in the first sentence introduces uncertainty and should be deleted. We recommend the entire reference to self/custom build within the policy could be deleted, as 5-10% would be required in any event through the adopted Local Plan Policy (DHG6 of the DaSA). If desired this could be explained in the supporting text. Also, on part (e), reference to the petrol station could be deleted as this requirement is somewhat outdated and it appears that Policy B3 no longer refers to a petrol station. RDC’s Council (Corporate) Plan and emerging Local Plan have key objectives of being ‘Green to the Core’</p>	
--	--	--	--

		<p>and 'Live Well Locally'. The Council declared a Climate Emergency and pledged to become a carbon-neutral district by 2030. We also feel this contradicts with statements within the RNP: Objective 5, paras 4.60 – 4.62, which mention transport hierarchy and sustainable modes of travel and make a statement about discouraging private car use. Para 5.20 and Community Aspiration 9 seek more electric car facilities and charging points – perhaps the petrol station allocation could be changed to an EV charging station.</p> <p>P43 Paragraphs 4.26-4.27 Both paragraphs include references to policies of the draft Rother Local Plan but do not make it clear that these are draft policies (indeed para 4.26 states the policies are from the Core Strategy, this is incorrect). This needs to be corrected and it should be recognised that these policies have no weight and are subject to change. It may be beneficial to reference a document that carries planning 'weight,' such as the National Design Guide, which conveys similar sentiments.</p> <p>P46 D1 High Quality Design Part a: Rother District Council's preferred design assessment framework is Building for a Healthy Life (BHL), as</p>	
--	--	--	--

		<p>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 utilized to inform decisionmaking (as per Para 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> <p>Parts d &amp; e: It is advisable to link the objectives of 'reducing energy consumption and carbon emissions' and 'conserving water resources' to measurable targets or 'higher standards' for clarity and accountability. We recommend using LETI Home   LETI or BREEAM Home Quality Mark resources standards.</p> <p>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). or include this in Policy T1 Connectivity and Sustainable Transport – section c.</p>	
--	--	--	--



		<p>P56 Para 4.52 We recommend this paragraph considers the effect of the existing adopted Local Plan policies rather than the emerging policies, which currently have no weight and are subject to change.</p> <p>P58 Para 4.53 It is unclear where the figures have come from (4075-4688 sqm) and whether they relate to retail (as the heading suggests) or employment floorspace. The Core Strategy requirement, set out in Policy RY1 (iv), is “some 1,650 sqm net additional convenience floorspace within or adjacent to the town centre”.</p> <p>P66 Parking We recommend referencing the Rye Town centre specific car parking survey completed by ESCC in 2021.</p> <p>P61 Para 4.58 Clarify that Policies LWL3 and 4 are draft policies.</p> <p>P 63 Policy T1 – Connectivity with 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). Perhaps some detail could also be included to suggest</p>	
--	--	--	--

		<p>how these measures could be provided.</p> <p>P68 Para 4.72 Again, the paragraph needs to clarify that it refers to the emerging draft Local Plan.</p> <p>P69 Policy I1 Last paragraph of the policy: the meaning of this is unclear, does it refer to mitigation arising from other sites? If so, then please amend 'matched' and refer to mitigation if there is a demonstrated deficit in provision.</p> <p>P71 Para 4.79 Last sentence: The HRA has only assessed the level of development anticipated through the Core Strategy, the HRA to support the emerging Local Plan will need to be developed further as the new Local Plan progresses.</p> <p>P74 Para 4.81 Policy DEV6 is from the draft Local Plan. We recommend the adopted Local Plan policy is referenced instead.</p> <p>P87 Policy E4 – Renewable and Low Carbon Energy There appear to be some words missing. Part (b): This requires some clarification i.e. where would it not be appropriate? Our emerging Local Plan uses LETI and BREEAM Standards to guide</p>	
--	--	--	--

		<p>development and we recommend these are referred to in the policy to align with current industry standards and give measurable targets in the policy.</p> <p>Freda Gardham Policy : H7 and B3.</p> <p>Additional comments from RDC officers after the consultation deadline and think it is best to forward them to you, as they may be useful for the progress of the RNP.</p> <p>They are from our Economic Development &amp; Regeneration team regarding the artist community at Freda Gardham school and are as follows:</p> <p>'We recommend that the Rye Creative Centre is mentioned. There are over 30 individual artists housed in the former Freda Gardham school, and they have during their 10-15 years there created a strong artistic community that adds a huge amount of value to the town. RDC supported the set-up of the Creative Centre working very closely with B&amp;R productions and we would be equally supportive in a relocation.</p>	
--	--	---	--

		<p>Here is a summary of the value of the creative industries and why we need and value them in Rother:</p> <p>In 2022, the creative industries generated £126 billion to the UK economy and employed 2.4 million people. There are over 139,000 arts businesses, 970,000 workers, 63,000 leisure-based arts groups with a GVA contribution of £49 billion. In 2021 the Creative Industries had an International trade surplus of +£2.1 billion in goods and +£18.7 billion in services. For the Cultural Industries the surplus was +£0.5 billion and +£4.0 billion respectively. In 2021-2022, Creative Industries employment grew by 9.8% and Cultural Sector employment grew by 6.4% compared to growth of 4.4% for the UK as a whole. There is considerable overlap between the creative industries, digital sector and cultural sector, which makes it difficult to measure precise contributions of some sectors but a report in 2023, which focused specifically on arts in the UK, found that the UK is one of only three net exporters of music in the world and is the world's second-largest commercial market for visual art; the UK won the highest number of Nobel Prizes</p>	
--	--	---	--

		<p>in Literature between 2000 and 2023 and the second highest number of academy awards for acting. The reputation of the country's arts sector contributes to the country's soft power overseas. The UK was the fifth largest exporter of creative services and the seventh largest exporter of creative goods, whilst a London &amp; Partners survey found that 73% of people surveyed across 80 different countries identified the UK "cultural offer" as a key motivation for visiting. In 2021, both the DCMS creative Industries sector and the DCMS cultural sector were net exports of traded goods - Creative Industries +£2.1 billion in goods and +£18.7 billion in services; Cultural Industries (+£0.5 billion in goods and +£4.0 billion in services)</p>	
C1 - 27	Local Resident	<p>Barn Owl, Mistle/ Song, Thrush, Green Woodpecker, Skylark, Partridge, Curlew, Avocet, Oyster, Catcher, Pied Wagtail, Meadow Pipit, Lapwing, Stoat, Vole, Stag Beetle, Butterflies, Cinnabar Moth, Bees, Common Lizard, Grass Snake.</p> <p>This list represents the fauna now almost entirely absent from the land which is part of the protected green</p>	Noted as support for the environmental value of the Strategic Gap Policy E1

		<p>space between Rye and the industrial area further down Harbour Road. The land is a flood meadow adjacent to the River Rother and until recently was covered with wild flowers, small scrub, anthills etc</p> <p>For years the nesting ground for Curlews, Oyster Catchers, Ducks Geese, Skylarks, Lapwings, Partridge and other ground nesting birds, It was sad to see this land shorn time and time again for no apparent purpose even as the birds tried to nest (a criminal offence). - With no flowers, plants etc insects have disappeared and therefore also the animals and birds that predated on them. I would hope it was an innocent oversight by the guardians of our beautiful town of Rye that looks down on this valuable oasis. The land has little or no agricultural value and the present situation is highly destructive. For a very small outlay, it could be restored as an asset for nature. There are many government grants for rewilding</p> <p>This land is a gift- why waste it?</p>	
--	--	--	--