

Rother Local Plan (Development Strategy) Reg 18 DRAFT Jan 26**(It is noted that this draft only forms part of the Draft Rother Plan)**

Part	Page Number	Paragraph	Subject	Rye Remarks
1	8	1.1	Plan	It is noted that this strategy forms only part of the Rother Local Plan
1	10	1.11	Plan Period	As Rye is reviewing its own NP (2023 to 2026) and is awaiting guidance on target numbers and plan period, presumably it can adopt and conform to the figures in the Rother Plan for its own Reg 16 version: 325 over period 2025 to 2042?
1	12	1.17 to 1.19	NP Allocations	Rye has made its own site assessment which provided the basis for the made 2019 RNP. This has been reviewed and fed into the Rother site assessment. Indeed the Rother DC plan now replicates the Rye allocation, which is contrary to Locality guidance?
1	17	Figure 1 - 1 to 11	Strategic Objectives	Q1: Rye supports the objectives and underscores the text on: 1. "Green and Blue infrastructure": define? 2. Maximise "conservation" 3. "setting" 4. ADD "Affordable"? 5. Nil 6. ADD "support Town Centres" 7. "timely delivery of infrastructure including medical and sewerage";

				8. Support for rural travel”; 9. Support “accessibility”; 10. Support “Neighbourhood Planning”; 11. “priority use of brownfield” ; “appropriate density for local context”
2	21	3.6	Housing Need	Support need for “affordable housing and affordable social housing” Little has been achieved in the last 15 years. Homes are needed for people servicing the care, hospitality, retail, and education industries. As the demand for 2nd homes influences housing need, was the demand across Rother factored into HEDNA? If so what figures were used for Rye?
2	24	3.16	Allocations	Allocations in the Rye NOP have been reviewed and numbers adjusted to take account of density and achievability.
2	27	3.24	Supply Targets	Q2: It is difficult to comment on The Rother total target but the disaggregated figure for Rye is achievable, despite the severe constraints in Rye such as flood risk and protected landscape. Because of the constraints, development potential is finite.

2	32	3.31 – 3.34	Retail	Q3: As a rural service centre, Rye centre provides needs for both Rye and the surrounding villages. Numbers used to indicate dependency should reflect that.
2	35	3.45	Housing Needs	Did the housing need consider the impact of 2 nd homes? In Rye the number could be as high as 400?
2	37	4.1	Infrastructure	Q5: Rye supports the need for infrastructure to match development. Over the plan period the Rye population could rise by some 2000 citizens and more employees in the Harbour Road. This will place huge increased demand on water, medical, early years learning and sewerage. The record shows that providers have not matched the increased demand of recent developments. Rye maintains its own IDP, which should be reflected in the Rother IDP.
3	45	5.12 – 5.13	Strategic Gaps	Rye strongly desires to retain its Strategic Gap - flooded to 12 inches in the near past - which was designed to prevent the coalescence of Rye and Rye Harbour using essentially protected land

				originally salt marsh of high flood risk and high ground water. This has been acknowledged in all plans for the last 20 years. The “green” gap adds value to the much loved character of Rye as it preserves the view of the town built on an outcrop rising from the Marsh.
3	46	5.14	Development Boundary	Rye has reviewed and made minor changes to its development boundary as part of the work of the RNP. The boundary is designed to prevent “urban creep” into marshland and areas of high flood risk and protected biodiversity. Certainly some land owners and developers would wish to seek further adjustment to enable development in the constrained areas , but Rye opposes this.
3	48-49	Figure 9	Density	Q7: Rye is categorised as “rural”, “heritage” and “maritime” location”. Rye strives to keep new building heights to 2.5 storeys to help preserve the unique character. It has reviewed appropriate density for new housing. It finds that areas of new development fall into the “Live Well Locally” category; therefore should be in the average 40 u/ha. The category “urban” does not realistically apply

				to Rye. For design purposes, the Neighbourhood Plan create three Zones: Yellow, Blue and Green. Only the Yellow can be sensibly called urban. The other two are rural suburban.
3	56	Figure 10	Rye Strategy	Q9: Rye is content that the Rye portion of the housing and employment growth figures are achievable within the plan period, provided that the employment growth figure takes account of further development in the Rye Harbour Road.
3	57	Figure 11	Dev Strategy	Rye agrees that Figure 11 represents the development strategy and constraints in and around Rye.
3	58 - 59	6.11 - 6.18	Dev Strategy	Rye endorses the text on rural communities and the need for sustainable transport. Rye agrees that the five split area is a more helpful description than the current term of "Rural Rother".
3	86	Figure 23	Dev Summary	Rye agrees that the figure represents the development strategy and constraints in and around Rye, provided that the employment growth figure takes account of further development in the Rye Harbour Road. To be more sustainable,

				there is a need for more employment within walking/wheeling distance of the main outer suburbs of Rye.
4	104 – 106	7.1 to 7.9	Allocations	Rye has made its own site assessment and site allocation, which provided the basis for the made 2019 RNP and subsequently the reviewed plan. The review has fed into the Rother site assessment (HELAA). However as this Rother DC plan now replicates the Rye allocation, is this contrary to Locality guidance for the division of allocation between District and NPs? During consultations, what voice does Rye have about representations which are counter to the Neighbourhood Plan?
4	447 – 469		Rye Allocations	Q49: Rye notes that this section replicates the allocations including small sites, of the Rye NP. Rye will welcome advice on how representations made on this draft plan will be handled to take account of the Rye Neighbourhood Planning process. Detailed comments on the 9 Brownfield sites within the development boundary are below.

				It is also noted that despite local priorities to include affordable housing – for younger people in the hospitality, care and education industries - that during the planning process for RY3 and RY9 no affordable housing is required to be provided, on grounds of “viability”.
5	589	Appx 1	Streets for All	Q66: Rye supports the Streets for All policy
5	593 – 604	Appx 2	Glossary	Define: “Urban, Suburban and Rural”? “Green and Blue Infrastructure”?
5	606 - 610	Appx 3	Development Options	SD01- Agree Rye Cluster SD04- Disagree: this is “urban creep” which development boundaries are set to deter SD06: Agree; all development sites in Rye are Brownfield SD08: Agree that this arbitrary division is rejected. SD09: Agree any development must take account of constraints SD011: Agree subject to constraints SD012: Agree SD014: Agree. Strategic gaps are designed to deter development to avoid coalescence and to protect biodiversity.
5	611-619	Appx 4	Development Strategy Options	Q67 - 69: Rye has no further comments.

Rother Policy Reference	Rye Reference and Location	Allocation and Comments
RY1	H3 - Tilling Green	Brownfield: suburban : 25 dwellings ; intentionally the majority of dwellings should be affordable/social and the community centre retained.
RY2	H5- Winchelsea Rd East	Brownfield: suburban: 10 dwellings and 500 sq m of employment space; access to flood defences need to be protected.
RY3	H6 - Winchelsea Rd West	Brownfield: suburban: 59 dwellings and 1900 sq m of employment space; SuDS is a key requirement, in addition to a bund is required to defend against surface water on the marsh; Rother DC has agreed NO affordable?
RY4	H7 - Former Freda Gardham	Brownfield: suburban: 50 dwellings and 500 sq m of employment space. Developer is seeking variance to the development boundary to include 6 more dwellings. SuDS is a key requirement, in addition to a bund is required to defend against surface water on the marsh; affordable homes?
RY5	H4 - Rock Channel Site A	Brownfield: suburban: 80 dwellings across two sites with different ownership; SuDS is a key requirement; access to the A259 via St Margaret's Terrace has to be resolved.
	No Ref - Cyprus Place Depot	Brownfield : urban: 7 dwellings Leased to a business, which Rye

		TC has agreed is of community value.
RY7	H4 - Rock Channel Site D	Brownfield: suburban: 600 sq m of employment space; only partially flood protected at high tides; ground floors need to be sacrificial. Environment Agency part owns this site.
RY8	No Ref - 17-19 Tower St	Brownfield : urban: 6 dwellings
RY9	H8 - Lower School Site	Brownfield : suburban: 88 dwellings Considered over development at 130 dwellings per hectare. No affordable,

Note: Suburban: areas beyond the inner boundaries of the Town of Rye.

Anthony Kimber MBE PhD

Rye NP

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