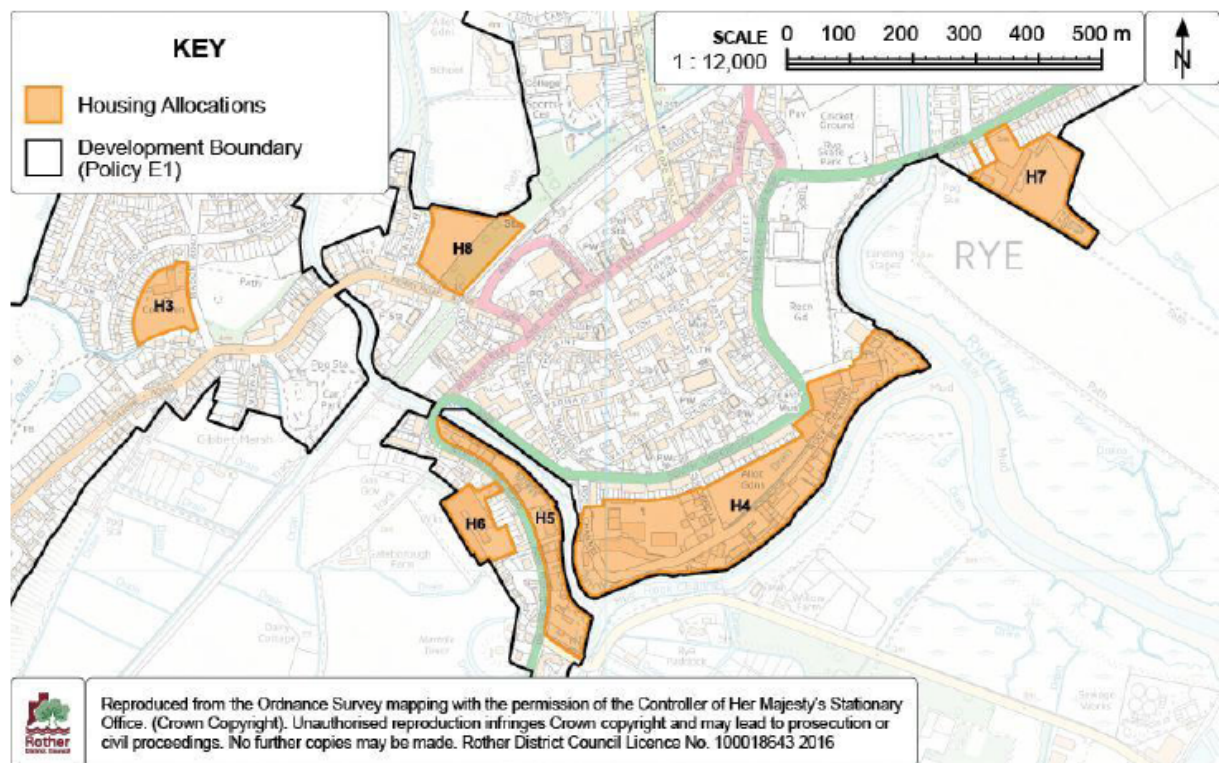


Policy H1 Housing Allocations: To meet the Rother Core Strategy housing target for Rye the following sites, as delineated on the Policies Map, are allocated for development subject to the criteria in policies H2-H8 and other relevant development plan policies:

- a. H3 - Former Tilling Green School for up to 20 dwellings
- b. H4 - Rock Channel for 30 dwellings
- c. H5 - Winchelsea Rd East for 10 dwellings
- d. H6 - Winchelsea Rd West for 20 dwellings
- e. H7 - Freda Gardham School for 30 dwellings
- f. H8 - Lower School Site for 50 dwellings

These allocations would provide a total of 160 dwellings.



RCS Comments

It is now understood that the 40 houses previously allocated at Rye Harbour may now not be feasible because of ecological concerns. With the publication of the revised NPPF July 2018 including the standardized method of calculating housing demand and the publication in September 2018 of the updated household growth projections the housing demand figure for Rye needs to be flexible and the figure of 160 would appear to be a sensible target. Particularly bearing in mind the difficulties in developing in Rye imposed by the flood plain and infrastructure constraints.

The Rye housing figure is likely to be amended following the 2019 5-year review of the Core Strategy.

Policy H4 relates to Site A only and the H1 policy map should be adjusted.

Policy H2 Housing Mix: The housing developments allocated within this Plan shall include:

- a. Affordable housing which will be appropriately integrated into each development so that it is indistinguishable from the equivalent market housing. Affordable housing should be spread carefully through the development, not isolated in specific blocks.**
- b. Housing of a size, type and mix which will reflect both current and projected housing needs for Rye, including dwellings suitable for elderly occupants and smaller units (1 and 2 bedrooms) for younger people and those looking to downsize their accommodation.**

RCS Comments

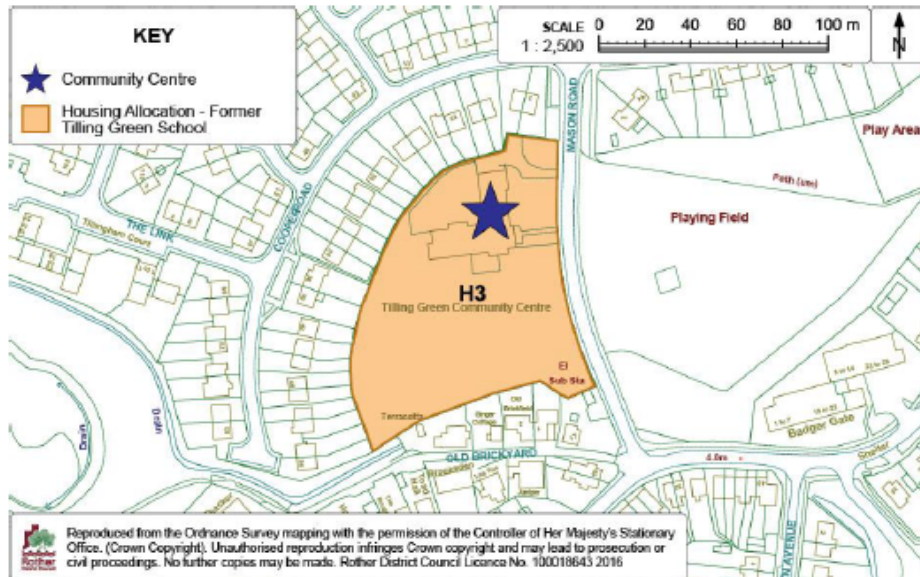
It would be helpful to refer to the ‘pepper potting’ constraints contained in the Rother Core Strategy Policy 15 Local Housing Needs para. 15.30

The Core Strategy sets out specific requirements as to mix and type ie affordable & market, size and mix and we believe that reference should be made to the relevant policies LHN1 & 2 and that if there is a strong need for smaller units, the 30% rule of smaller units (mainly 2 bed) in rural areas should be adopted for Rye.

The Society believes that the requirement in the CS to provide a proportion of homes to Lifetime Homes Standard (CS LHN1 (vii)) should be emphasized.

Policy H3 Former Tilling Green School is allocated for a development of up to 20 dwellings and a community centre (up to 500 sq m), with up to 10% being self /custom build subject to the following criteria:

- a. The community centre is to be retained in-situ or re-provided before the dwellings are occupied;
- b. If the community centre is re-provided it shall face onto Mason Road to make a more community inclusive and accessible facility;
- c. The design of new development shall be sympathetic to the building form and materials used in surrounding buildings and provide appropriate private gardens for the dwellings and public open space for the community centre;
- d. Car parking should be provided according to appropriate standards; an approved access provided, and
- e. Flood risk is to be mitigated by a SUDS for surface water and improved sewerage to cope with the additional flows. This must alleviate historical surface water flows and ponding in Mason Road.
- f. Any development application may need to be informed by an Ecological Impact Assessment (EclA) in line with BS42020:2013 and CIEEM guidance.



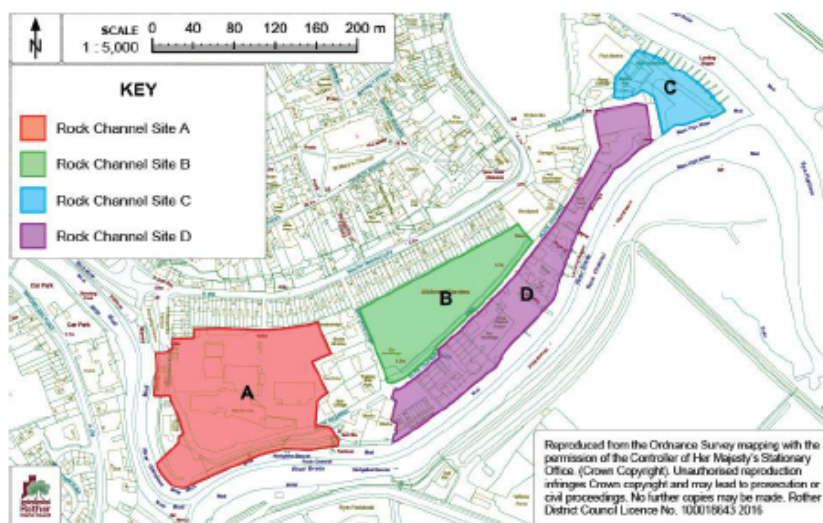
RCS Comments

The Society welcomes the increase in the potential housing numbers to 20 which will help to underpin the commercial viability of any future proposals.

We note that this is the only housing policy which notes the need for new buildings to be sympathetic in form and materials to the surrounding buildings and to have appropriate private gardens. Why is this area special. Surely this should apply to all the housing sites subject to viability with respect to the gardens.

Policy H4 : Rock Channel, Site A is allocated for a mixed use development of 30 dwellings in this location, subject to the following criteria:

- a. The design of new development shall be innovative, of high architectural quality to enhance setting against the Rye Conservation Area and having regard to its riverside location, with green spaces and improved and accessible riverside walks;
- b. Access to the site will be via the existing track on the west side of the site, upgraded as necessary, with an improved access point onto the A259 as required by the Local Highway Authority;
- c. The development shall be designed to minimise and mitigate flood risk including appropriate surface and waste water drainage; and
- d. Development of the location will need to be undertaken on a comprehensive basis and/or according to an overall masterplan.
- e. Any development application may need to be informed by an Ecological Impact Assessment (EclA), in line with BS42020:2013 and CIEEM guidance.
- f. Occupation of the development is phased to align with the delivery of sewerage infrastructure



RCS Comments

The Society welcomes the broader approach to the development of this site but remain concerned as to the requirement that any development 'will need to be undertaken on a comprehensive basis and/or according to a masterplan'. The reality is that the site is in 2 separate ownerships and there is no guarantee that they will be developed at the same time. Who therefore, is to develop a masterplan? The best that can be achieved is surely for the developer of one site to ensure that access to the other is provided for and then to rely on the design principles contained in the Core Strategy and the RNP to be applied to both sites. What is the problem if the two sites are developed in a different style as it is the very mixture of styles and materials that make Rye so attractive.

We believe that the policy should be expanded to require that the design 'creates a strong sense of place' within the two likely development sections.

Policy H5 Winchelsea Road [East Side] is allocated for a mixed use development with up to 10 dwellings across the broad location, car parking or B1 employment subject to the following criteria:

Development of the location will need to be undertaken on a comprehensive basis and according to an overall masterplan;

The design shall be of high architectural quality and create a strong sense of place to enhance its setting against the Rye Conservation Area and having regard to its riverside location.

There should be provision for riverside green spaces and access for the England Coastal Path (Eastbourne to Camber);

Any scheme shall enable views from the South to the cliff face, maximising visual permeability, and with roof heights set not to obstruct longer views from the countryside towards the Citadel;

The development shall be designed to minimise and mitigate flood risk and enable efficient drainage.

Any development application may need to be informed by an Ecological Impact Assessment (EclA), in line with BS42020:2013 and CIEEM guidance.

RCS Comments

The RNP notes that ‘4.12 The mixed ownership makes for challenging integrated planning as does the accessing of sites directly off the A259.’ This combined with the differing usages and tenure types would make the development of any overall masterplan virtually impossible in our view. Who would produce such a plan as we suspect that Rother do not have the capacity within the planning department. Are we expecting a developer of one of the individual small site to come up with a masterplan for the whole of the site. This is surely nonsensical and will impose an unnecessary burden on any potential development and one would have to question what credence one would place on such a masterplan.

The design constraints in the Core Strategy and in the RNP and Policy H5 should be enough to cover future developments.

Policy H6 Winchelsea Road [West Side] is allocated for a mixed use development of up to 20 dwellings and B1 employment subject to the following criteria:

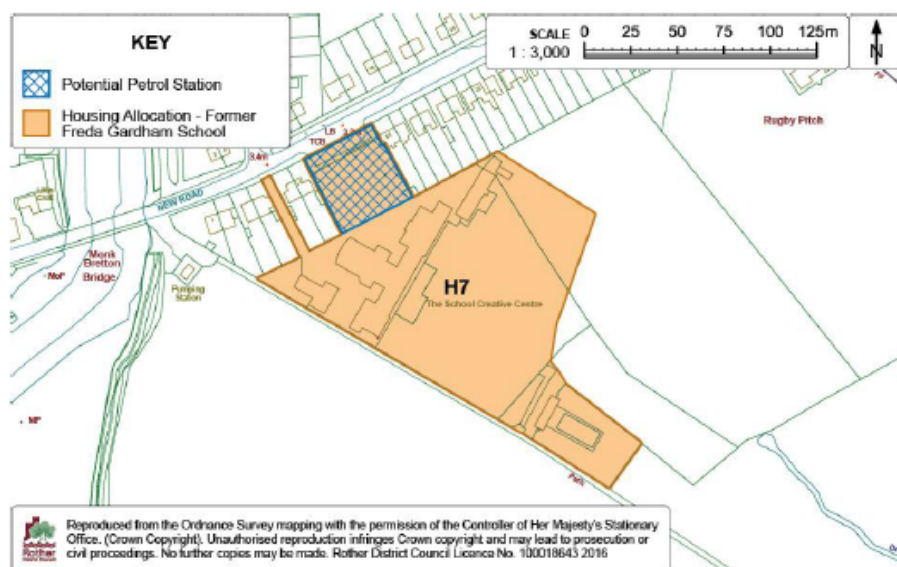
- a. Development of the location will need to be undertaken on a comprehensive basis and/or according to an overall masterplan;**
- b. The design shall create a strong sense of place;**
- c. Buildings shall be orientated to allow views through to the marsh to the south-west; and**
- d. The development shall be designed to minimise and mitigate flood risk.**
- e. Any development application may need to be informed by an Ecological Impact Assessment (EclA), in line with BS42020:2013 and CIEEM guidance.**
- f. Occupation of the development is phased to align with the delivery of sewerage infrastructure**

RCS Comments

As the site is in one ownership and due to its size and limited access, an overall plan will form the basis of any application even if it is to be phased such as at Valley Park.

Policy H7 Former Freda Gardham School site is allocated for residential development of up to 30 dwellings, at least 10% of which will be self /custom build subject to the following criteria:

- a. The development shall not commence until the flood mitigation works planned for 2022 by the Environment Agency for the eastern bank of the River Rother (Eastern Rother Tidal Walls) have been fully implemented;
- b. The development shall include appropriate treatment to the south and west boundaries to protect the countryside and habitats beyond; and
- c. The development shall be designed to minimise and mitigate flood risk and provide effective drainage.
- d. The layout of any development shall ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes;
- e. There should be adequate access to/from the A259.
- f. Any development application may need to be informed by an Ecological Impact Assessment (EclA) in line with BS42020:2013 and CIEEM guidance.



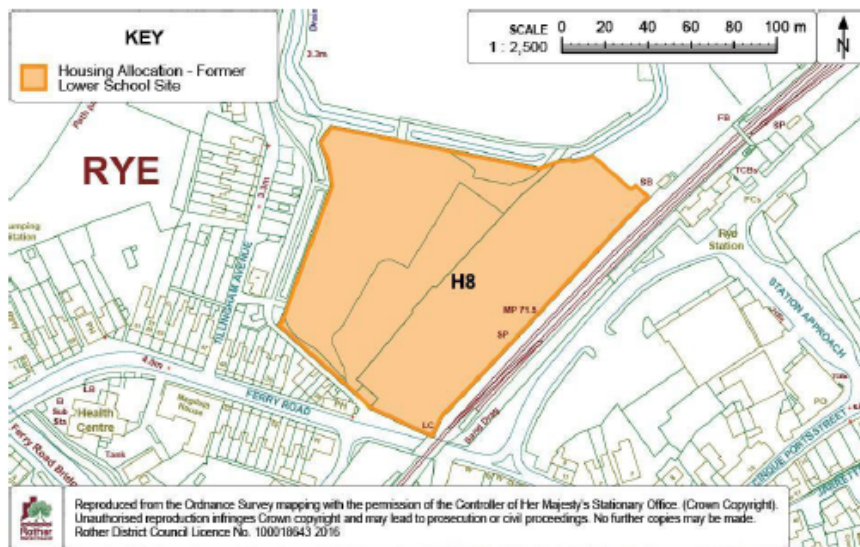
RCs Comments

The Society believes that this site is more appropriate for a mixed development including a petrol filling station given its location on the A259 and to Rye. We do question however whether the area shown on the plan is adequate for a filling station and small supermarket, such as that proposed for Udimore Rd by BP. See our detailed comments on Policy B3.

We remain concerned as to the effect on the views of the Marsh from Rye that development of the site as shown on the plan and would prefer to see the site reconfigured as that set out in the 2013 SHLAA which rejected a good part of the site on landscape grounds. Why has it changed and why not include the land behind the existing houses up to the boundary with the Rugby Club Field?

Policy H8 Former Lower School Site is allocated for up to 50 dwellings subject to the following criteria:

- a. The development shall be designed to minimise and mitigate flood risk;
- b. The development shall be designed to avoid damage to the Natural England priority woodland;
- c. Access to the site shall be carefully designed to be safe, accessible for pedestrians and cyclists as well as vehicles and avoid conflict with the nearby level crossing of the railway;
- d. Parking provision on the site will be in accordance with local standards and avoid increasing pressure for on-street parking in the vicinity of the site.
- e. Any development application may need to be informed by an Ecological Impact Assessment (EclA) in line with BS42020:2013 and CIEEM guidance.
- f. Occupation of the development is phased to align with the delivery of sewerage infrastructure



RCS Comments

We believe this site area should include the Queen Adelaide which is in the same ownership (from Land Registry records) as the whole site is likely to be required to meet the Network Rail and ESCC Highway access requirements. The whole site including the Queen Adelaide was included in the original sale document.

Clause (d) of Policy H7 would also apply to this site as would the clause relating to the need to provide a 'sense of place' particularly given the size of this development.

Policy D1 High Quality Design: Development within Rye will be expected to achieve high quality design having regard to the character of the area in which the development is located, which is detailed in the Rye Character Assessment. Proposals will demonstrate how the design has had regard to the relevant development plan policies and the following principles specific to Rye, to:

- a. Achieve high quality design on a human scale with a clear sense of place; connection to its surroundings and adhering to such principles as "secure by design";
- b. Have regard for the distinctive topographical context, including the high prominence of roof and townscape;
- c. Protect the historic environment by recording the archaeology – by desk based assessments - relating to Rye's long history as a port, trading and agricultural centre as part of all planning applications on the development sites;
- d. Achieve selective redevelopment which is planned comprehensively rather than piecemeal;
- e. Achieve a vibrant mix of land uses such as housing, employment and retail;
- f. Make the best use of the rural margins and riverfronts to reinforce the connections between the town and its landscape setting;
- g. Ensure improved accessibility including pedestrian and cycling routes linking all areas to each other and back into the centre of Rye, reinforcing Rye as 'a connected community' with pedestrian and cycle access to all;
- h. Design dwellings to take into account the requirements to address locally specific flood-risks;
- i. Design into all developments storage facilities for recyclable materials as holding areas prior to collection;
- j. Maintain quality into the future through the use of sustainable and good quality materials, sound construction techniques, and planned management regimes;
- k. Provide access to electric car charging points for all new developments.

RCS Comments

The Society believed that it would be helpful if this policy made reference to Policy E3 Heritage and Urban Design as they are interlinked particularly given the historic nature of much of Rye built fabric.

We also question, in practical terms, exactly what (d) means as it could be read that all developments across Rye would have to be part of an overall plan which is actually what the RNP is. So why say it again. If this implies an overall design approach as to say, specific elevational treatments then is this what we want? Are we going to call for all new development to be in "new England" style?
Also which developments does this apply to?

Policy F1 Reducing Flood Risk

Development in areas at current or future risk from flooding will be subject to a Flood Risk Assessment which applies the 'sequential test' and 'exception test' and demonstrates that:

- a. there are no other reasonable available sites for the development;
- b. there are sustainability benefits to the community that outweigh flood risk; and
- c. the development can be made safe for its lifetime without increasing risk elsewhere.

Flood Risk Assessments (FRA) will take into account the following local characteristics:

- a. the particular geographic location of Rye at the confluence of three rivers and the coast;
- b. the planned improvements to flood defences and the need to maintain those that exist;
- c. the need to address local sewerage systems which, in extreme conditions, in order to prevent hydraulic overload may discharge diluted untreated wastewater to water courses and the sea;
- d. the need to manage drainage for surface water to reduce existing flooding problems either on the site or elsewhere, taking into account the springs to the north and west of Rye which aggravate surface water and ponding and can also be the cause of soil erosion and landslip;
- e. the need to avoid any loss of or have adverse impact on any open watercourse and existing culverts and drainage ditches;
- f. the use of Sustainable Drainage Systems (SUDS) and measures such as permeable driveways, water harvesting systems and/or green roofs;
- g. the impact of any flood mitigation measures on the local habitats and wildlife, which are protected by national and international designations.

All design to cope with flood risk will take full account of the detailed technical guidance accompanying the National Planning Policy Framework. (Footnote 34).

RCS Comments

This Policy will be subject to sign off by East Sussex County Council.

We believe that that a clause requiring all new surface water courses to be open except for access would reduce future problems with blocked pipes etc.

We also feel that the importance of future lifetime maintenance arrangements for SuDs schemes should be emphasized particularly given the conclusion of the August 2018 SuDs review.

'The Government recognises that more emphasis on SuDS adoption and maintenance arrangements by applicants is required. LPAs need to be satisfied that clear maintenance arrangements are in place for the lifetime of the development.'

Policy B1 Employment and Business Development

To support the economic vitality of Rye development proposals for the following will be permitted subject to other relevant development plan policies:

- development which regenerates or enhances the fishing and maritime and port related industries;
- development of micro (low footfall) businesses around the Citadel in Zone Blue (Figures 12 and 17);
- proposals for new business development especially small scale flexible office units, affordable workshops and high quality office space;
- development which facilitates improved broadband access for businesses and home workers.

Existing employment and business floor space will be safeguarded unless it can be demonstrated to the satisfaction of the Local Planning Authority that the premises are no longer suitable for employment and evidence has been submitted that demonstrates that the property has been actively marketed for at least 18 months on realistic market terms; it is shown that there is no prospect of new employment and business occupiers being found or no relocation to more modern facilities in Rye Harbour.

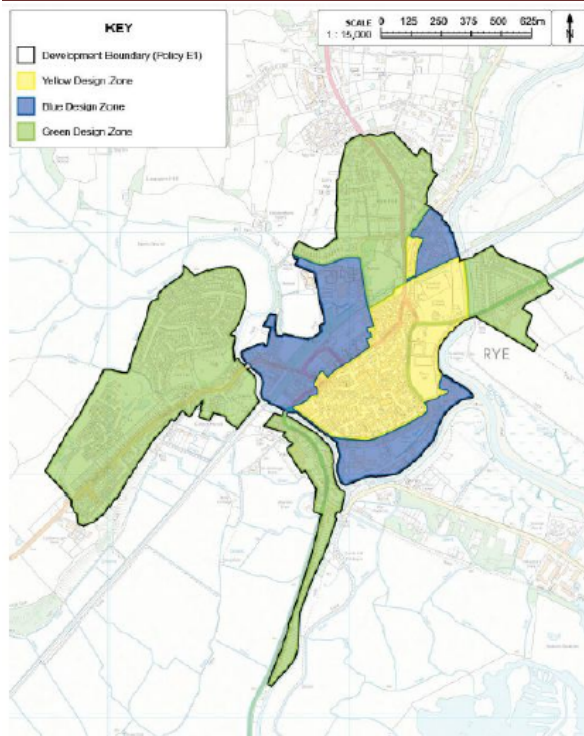


Fig 17

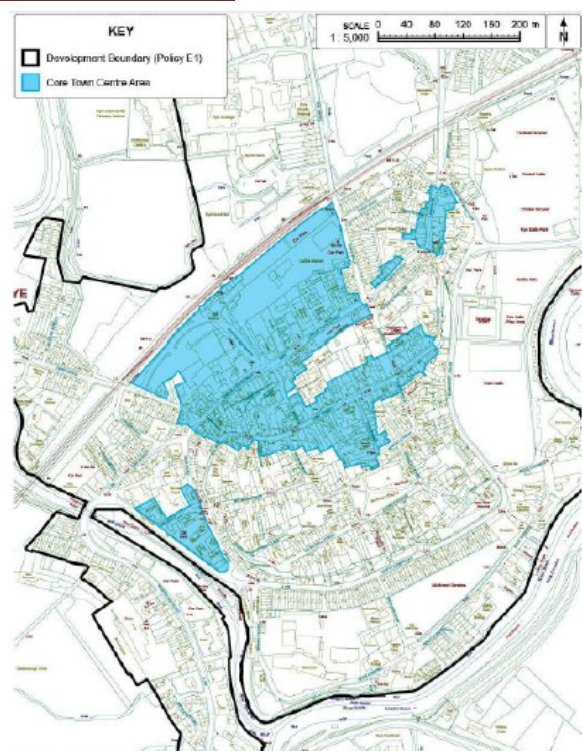


Fig 12

RCS Comments

Fig 12 in clause (b) should be omitted as there are differing blue zones on both plans or the clause reworded.

Policy B2 Supporting Rye as a Visitor Destination

To support the attractiveness of Rye as a place to visit, development proposals for the following will be permitted subject to other relevant development plan policies:

- a. Development that enhances the Town Centre Area (Figure 17) and the area around (Zones Yellow and Green in Figure 12) to improve visitor attraction and "reasons to visit", such as that related to art, culture; festival and entertainment.
- b. Proposals that support the retention of the former cattle market as a site for a traditional weekly market and daily parking;
- c. Proposals that support the maintenance of an information centre as part of the Rye Heritage Centre;
- d. Proposals that support the provision of visitor accommodation and hospitality services; and
- e. enterprises which promote "green tourism" such as walking and cycling and appreciation of the area's natural assets.

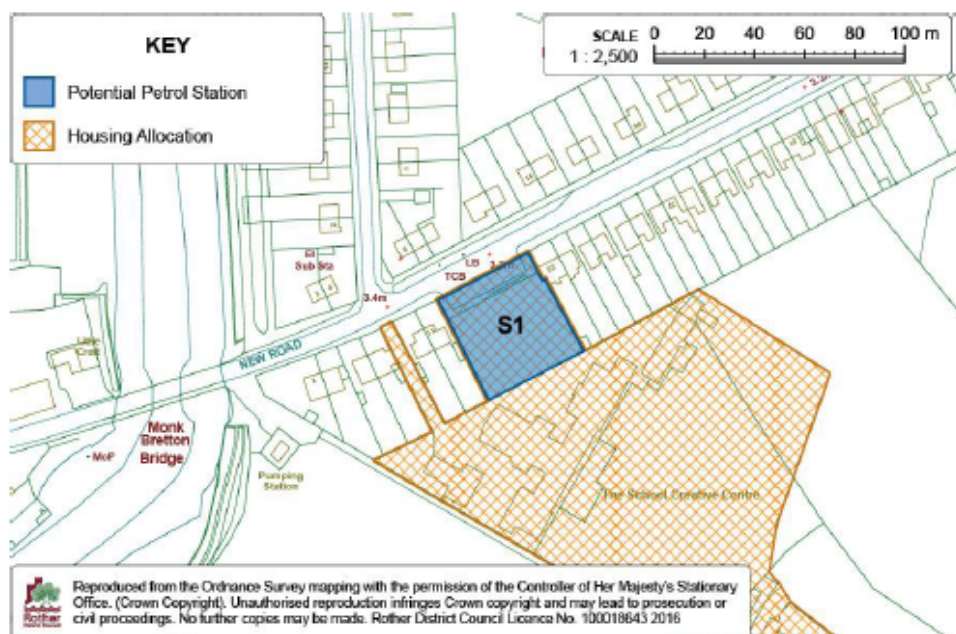
RCS Comments

Should not clause (a) refer to zones yellow and blue rather than green as the majority of what is in zone green is post war residential which hardly counts as an area with 'reasons to visit'.

Policy B3 Further Convenience Store Provision

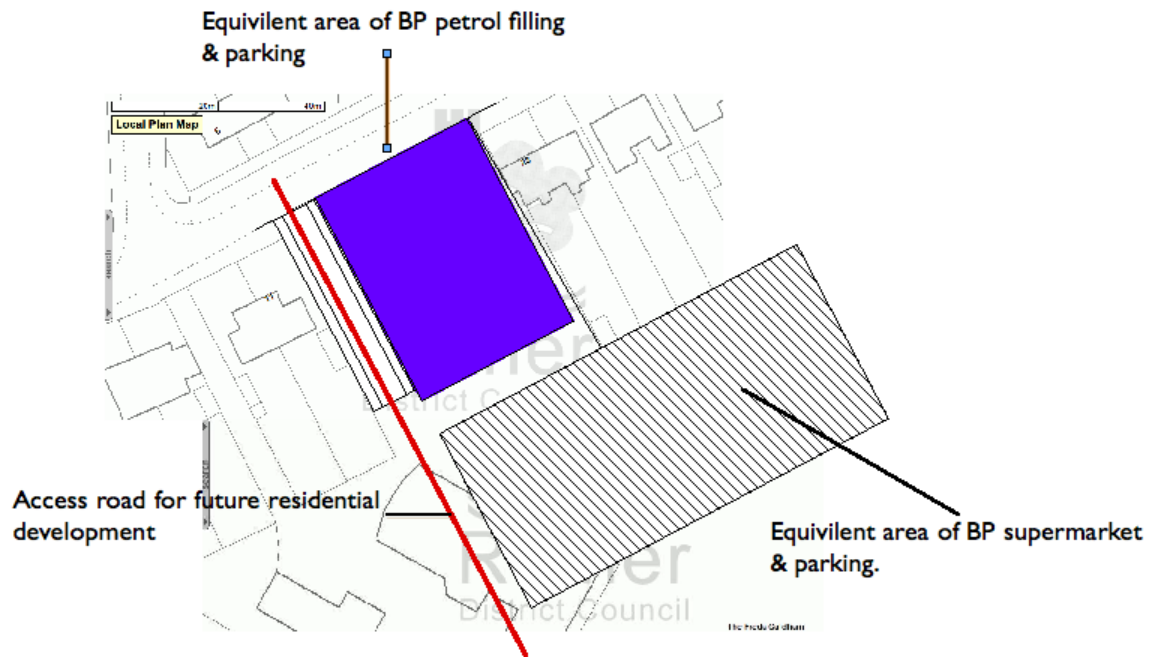
A site (S1) at the Former Freda Gardham School is allocated for a petrol station and convenience store of up to 500 sq m subject to other relevant development plan policies and the following criteria:

- a. Submission of a retail impact assessment demonstrating that the proposal will not have a significant adverse impact on the vitality and viability of the town centre;
- b. The development will be of a form, scale and height appropriate to its setting and retain or replace existing trees and other vegetation;
- c. The development will retain and enhance pedestrian links into the town centre to encourage linked trips;
- d. The site will have a separate road access from the housing development (H7) to the South.
- e. The development shall be designed to minimise and mitigate flood risk.
- f. Any development application may need to be informed by an Ecological Impact Assessment (EclA), in line with BS42020:2013 and CIEEM guidance.



RCS Comments

Whilst the Society agrees that this location for a petrol filling station is more appropriate given its location on the A259 and its proximity to the centre of Rye, it is unlikely that such a development is unlikely to be undertaken without an accompanying small supermarket to make the development finances work. Our concern is that the site S1 is not large enough as shown for both. If it is compared to the application by BP (allowing for a suitable access road of 5m with pavement) then the extent of the site required indicates the undersizing of S1 and the extent to which H7 would be eaten into. See plan below.



Limiting the site area for a potential filling station would allow a potential developer to argue that the site is impractical on cost viability grounds and therefore increase pressure on sub optimal sites elsewhere.

We also have concerns as to the effect on the amenity of the current and future residential occupiers of a 24/7 illuminated commercial unit in this area.

Have the local residents been sufficiently consulted so that the plan does not suffer from the 'Gibert Marsh' problem?

Policy I1 Infrastructure and Community Facilities

In order to meet the future needs for essential infrastructure for the Community, improved utility infrastructure will be encouraged.

The following facilities are particularly valued by the community and they will be safeguarded from loss or alternative uses: Community Centres (Conduit Hill and Marley Road); Early Years facilities, Rye Leisure Centre; the Salts sports fields and facilities including Rye Bowls Club; and Rye Rugby Club.

Development proposals that result in the loss of sites or premises currently or last used for community purposes will be refused unless:

- a. alternative provision of the equivalent or better quality is available in the local area or will be provided and made available prior to the commencement or redevelopment of the proposed scheme; or
- b. it can be demonstrated there is no reasonable prospect of retention for the current use and that no other community use of the site is suitable or viable.

Policy T1 Connectivity and Sustainable Transport

Development proposals within Rye will be permitted subject to other relevant development plan policies and the following criteria:

- a. The development is located close to the town centre and other community facilities to enable access to these amenities by walking and/or cycling;
- b. The design of new development makes the most of opportunities to improve walking or cycling facilities in and around the site, including linking with other strategic routes such as the National Cycle Network and the Greenway initiative;
- c. The development includes cycle parking and other facilities that would encourage users to access the site by foot or bicycle.
- d. Cycling will be encouraged along a proposed route alongside the Royal Military Canal
- e. At Rock Channel it supports the delivery of an enhanced riverside walk on the town side of the water.

RCS Comment

We note that no mention is made of the England Coastal Path Camber to Eastbourne, although it is mentioned in Policy H5.

Policy T2 Car Parking

Development proposals which do not meet the parking standards specified below for Rye will have to justify to the Planning Authority the reasons for the lower provision:

- a. new dwellings with 1 bedroom will be provided with a minimum of 1 off street parking space per dwelling.**
- b. new dwellings with 2 or 3 bedrooms will be provided with a minimum of 2 off-street car-parking spaces per dwelling.**
- c. new dwellings with more than 3 bedrooms shall be provided with a minimum of 3 off-street car-parking spaces.**

All proposals will need to demonstrate provision for visitor spaces and cycle parking

RCS Comments

The Society would generally welcome an increased level of off street parking particularly if applied equally to all types of dwelling but remains concerned as to whether an increased standard of provision will be acceptable to ESCC Highways.

Given the experience of Robertsbridge has the direct question been asked of ESCC as to whether they would accept an increased standard over the ESCC parking model?

There is also the effect of a higher parking standard on the viability of developments and the ability to deliver the housing numbers set out in Policy H1. Developers are likely to object on the basis that a higher standard would not be in line with ‘sustainable development’

If this standard were to be applied to the proposed redevelopment of the former night club at 48 Ferry Road 16 spaces would be required (7x2 +2x1) with additional provision for visitor parking, the ESCC model results in min 9 unallocated and they have accepted 6 in total (recent email B Lenton ESCC>RDC).

The Society would favour a policy of rigorously imposing the current ESCC model requirements based on allocated spaces for all dwellings.

Given the importance of on street parking for many residents of Rye, the Society believes that a policy where any proposals resulting in an overall loss of on street parking would not be supported, should be included.

Policy E1 Development Boundary , Strategic Gap & Setting of Rye

New development in Rye will be contained within the Town's Development Boundary as defined on the Policies Map.

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

To preserve Rye's unique setting, particular control over development will be applied to conserve and enhance the open landscape on the edges of the Town including the Strategic Gap between Rock Channel and Rye Harbour.

RCS Comments

The extent of the Strategic Gap , in either its current or proposed form, is not shown on the Policy map or the maps indicating the areas of special environmental interest.

Policy E2 Green Infrastructure

To protect and encourage the provision of green infrastructure:

- a. the green spaces listed below and identified in Figure 28, will be safeguarded from loss or alternative uses.

A and B: Valley Park common areas

C: Masons Field

D: Tilling Green Triangle

E: Pottingfield Greens 1, 2 and 3

F: Gibbet Marsh – Green Space (overflow car park)

G: The Strand

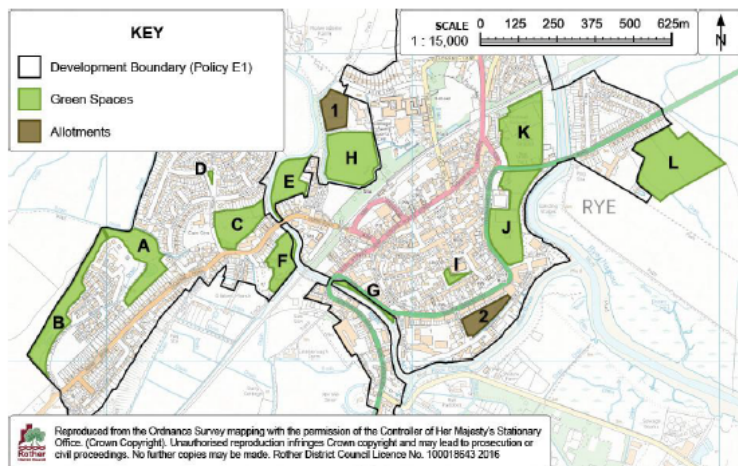
H: Rye College Sports Field

I: The Church Yard

J and K: North Salts; Middle Salts and Town Salts

L: Rye Rugby Club Field

- b. Any trees lost through development are to be replaced either on the site or in close vicinity to it. As roots are vital to keep trees healthy and upright all development proposals must take into account the impact on the roots of trees to be retained and avoid damage to them.
- c. Where practical, development proposals will include improvements to local green infrastructure, particularly to improve connectivity for people and habitats.



RCS Comments

The Society is unclear as to whether these ‘green spaces’ are Local Green Spaces as defined by NPPF para 77 as if they are meant to be some do not meet the NPPF criteria. If LGS are to be designated then these should be C, H, J, K & L.

We find it odd that the most protected open area in Rye, St Mary’s Churchyard which is part of the curtilage of a Grade I listed building, is consecrated ground and in the Conservation Area, is included within this list.

We remain concerned at the practicality of the provision of replacement trees ‘in close vicinity’ to any site as the developer is unlikely to have control over such areas.

Policy E3 Heritage and Urban Design : All development and major repairs by Highways Authorities and Utilities, impacting on the historic built environment of Rye will be designed with regard to the characteristics set out in the Rye Conservation Area Appraisal. These include:

- The archaeological interest of the buildings themselves;
- The medieval pattern of narrow streets with most of the buildings lining the footways; the occasional recess by way of court or garden providing an interesting contrast and giving variety to the streetscene;
- Partially revealed ‘glimpse’ views created by the curve or slope of many of the streets or by passageways;
- Buildings largely of two or three storeys with pitched roofs in which there are often dormer windows;
- The high number of timber-framed buildings, with the more formal work of the medieval period being represented in the few buildings of stone;
- The restricted palette of materials, prevalent ones being brick, handmade clay tile (for roof or tile hanging), weather boarding, painted render and slate;
- The good historic street surfaces including several streets that are paved with cobbles;
- The highly visible and important roofscape of jumbled historic clay-tiled roofs, its impact heightened by the topography of the town.
- The distinctive and high quality, often historic, shop fronts and advertisements.

RCS Comments

The Society welcomes the inclusion of para. (i) relating to historic shop fronts and advertisements. Rye is in the rare position of having a number of its cobbled street listed, ie the cobbled surface itself, and we believe that this should be highlighted in clause (g) to strengthen awareness and control of any works undertaken.

Policy E4 Renewable and Low Carbon Energy

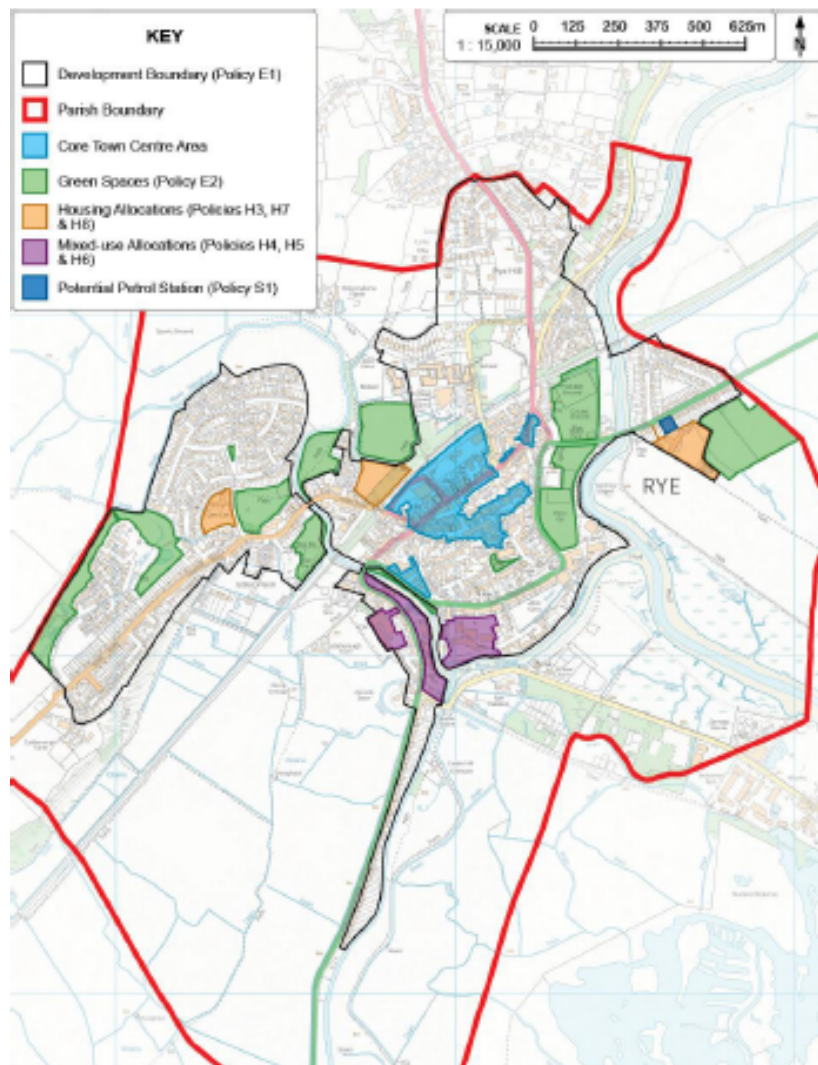
All new developments shall be required to submit an 'energy statement' proportionate to the scale of development which explains how the proposal promotes the use of renewable and low carbon energy. Measures could include the following:

- a. The installation of smart meters for gas and electricity.**
- b. The fitting of solar panel systems where this is appropriate to the character of the building and the area.**
- c. Systems which permit energy storage (to transfer the 11am – 2 pm generation peak of a solar panel system to the evening demand peak between 6pm and 9pm).**
- d. Small scale individual and community energy generation systems including solar photovoltaic panels, biomass, anaerobic digestion and communal combined heat & power (CHP) units, ground and air source heat pumps.**
- e. Demand response systems (rather than supply side) integrated by Virtual Power Plant (VPP) to manage the timing of peak demands for electricity.**
- f. Ground source heat pump (GSHP) networks where they can be installed in new installations such as future flood defences.**

RCS Comments

What happens if a developer submits an 'energy statement' which shows that they do not intend to promote the use of renewable and low carbon energy. Should not this policy be in favour of developments that do, otherwise its toothless. Alternatively proposals that do not include measures to promote the use of renewable and low carbon energy would not be supported.

Policies Map



RCS Comments

The Society believes that both the Conservation Area boundary and the Rye Harbour Strategic Gap should be shown on the Policy Map as they are both of significance in development terms.

8 October 2018