

Submission Rye Neighbourhood Plan Representations

Respondent Details			Agent Details		Part of Neighbourhood Plan		Comment Full	Participate in oral exam	Notify when NP made
Reference	Respondent Name	Organisation (if applicable)	Agent Name	Organisation (if applicable)	Item	Support/ Object/ Comment			
RYE/R16/2019/1	Peter Varley	n/a	n/a	n/a	p94 chapter 5 Policy no. CA12 paragraph no. 5.23 Figure/map no. 39	Comment	It is a shame that the chance to improve the High Street by pedestrianisation or shared space proposals is only a 'Community Aspiration'. The charm of the unique High Street is being rapidly eroded by motor vehicles to the detriment of its viability.	no	yes
RYE/R16/2019/2	Stephen Blattman	n/a	n/a	n/a	Policy no: RNP Support 2	Object	Gibbet Marsh carpark. I understand that this area is now within the development boundaries. If the community opposes this, why is it the plan? 1. We are losing more open spaces 2. There is already enough housing in Rye albeit unaffordable. Pages 14 & 15 Development Boundary, but with flood mitigation necessary together with potential biodiversity impacts. Flood risk to be mitigated; would need SSFRA Not on A259, but in west of Rye near to largest percentage of population. Access issues: needs improvement to access road width and sight lines. Community oppose any development	yes	yes
RYE/R16/2019/3	Spencer Jefferies	National Grid	Hannah Lorna Bevins	Wood plc	neighbourhood plan	Comment	National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation. Specific Comments An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area. Key resources / contacts National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ Electricity distribution The electricity distribution operator in Rother Council is Scottish and Southern Electricity Networks. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database: I hope the above information is useful. If you require any further information, please do not hesitate to contact me.		
RYE/R16/2019/4	Mr Ian Potter	Rye Amenity CIC	n/a	n/a	p. 27 policy no: E2 Figure/map no. 28	Comment	We would urge that the text at pages 27, 28 and 72 is tightened insofar as it relates to the two allotment sites in Rye and the Rye Community Garden. As the organisation that operates the allotment site, we can confirm that both are highly valued in the local community and that there is a waiting list for allotments in Rye. Both sites are already designated as Assets of Community Value and they should be afforded the greatest possible protection in the Neighbourhood Plan. Figure 28 should include both allotment sites as designated "Green Infrastructure" protected by Policy E2. The allotment sites and the Community Garden clearly fit the criteria in that they "contribute to delivering a wide range of environmental and quality of life benefits" for the local community. Further, the Community Garden is a large open space, very close to housing (Love Lane and Tillingham Avenue) and places of work (Rye College and Rye Primary School) and it provides the opportunity for informal recreation all year round. Also, the South Undercliff allotment site is open to the public with a footpath leading from South Undercliff at one end to Shipyard Lane at the other; it is in the middle of large areas of housing and in close proximity to a number of workplaces. There is a designated open 'communal' area that affords the opportunity for visitors to sit and relax in a small orchard-style area. The South Undercliff site is often used by nearby residents, not just allotment plot holders.	Yes	Yes

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RYE/R16/2019/5	Ms Charlotte Mayall	Southern Water	n/a	n/a	Neighbourhood Plan Policy no: E2	Comment	<p>Southern Water understands Rye Town Council's desire to protect its Green Infrastructure by designating Local Green Spaces (LGS). However, we cannot support the current wording of this policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.</p> <p>Paragraph 101 of the National Planning Policy Framework (NPPF, 2018) establishes that policies for managing development within LGS should be consistent with those for Green Belts whilst Paragraphs 143-144 establish that inappropriate development in the Green Belt 'should not be approved except in very special circumstances', in which the potential harm of a development proposal is clearly outweighed by other considerations.</p> <p>Southern Water considers that should the need arise, special circumstances would exist in relation to the provision of essential water or wastewater infrastructure (e.g. a new pumping station) as it would be required to serve new and existing customers or meet stricter environmental standards. The provision of such infrastructure is essential for sustainable development. It is likely that there would be limited options with regard to location, as any new infrastructure would need to connect into existing networks. The National Planning Practice Guidance recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'.</p> <p>Proposed amendment</p> <p>The submitted Neighbourhood Plan does not reflect the NPPF and could act as a barrier to achieving sustainable development as outlined above. The following proposed policy provision would address this and enable the basic conditions necessary for a Neighbourhood Plan to be met:</p> <p>a. the local green spaces listed below and identified in Figure 28, will be safeguarded from loss or alternative uses, except in very special circumstances, for example for the provision of essential utility infrastructure, where the benefit outweighs any harm, or it can be demonstrated there are no reasonable alternative sites available.</p>	No	Yes
RYE/R16/2019/6	Mr Allen Cottell	Rye south undercliff allotment group	n/a	n/a	Neighbourhood Plan p.24 Chapter no: 4 Policy no: H1 Paragraph no: 4.3 Figure/map no. 5	Comment	Under policy h1 housing allocation, map 5 showing primary housing sites, south undercliff allotments are included in the rock channel area available for housing. On map 7 the allocation of 30 houses for rock channel is confined to site A and it is stated that it is intended that site B remain as allotments. There is therefore a contradiction inherent in these two positions. The policy should unambiguously state that south undercliff allotments are not to be considered as available for housing. The allotment site is a thriving community asset greatly valued by both its users and those that benefit from its amenity as an accessible green space. The site has been threatened by the possibility of development in the past and is therefore most sensitive to even the most ambiguous further threat.	yes	Yes
RYE/R16/2019/7	Andrew Collis	Gladman Developments Ltd.	n/a	n/a	RE: Rye Neighbourhood Plan Regulation 16 Consultation	Object	See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31345		
RYE/R16/2019/8	Konstantinos, Gallios	SGN	n/a	n/a	Neighbourhood Plan	Support	See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31346	No	yes
RYE/R16/2019/9	Sophie Page	Environment Agency			Policy F1 Policy H7 Policy E2	Comment	See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31347		

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RYE/R16/2019/10a	Martello Developments Ltd		Mike Pickup	Town & Country Planning Solutions	H1 & H5 chapter 4 para 4.12	Object	These representations are submitted on behalf of Martello Development Ltd. who, based in Rye, have invested in acquiring the disused, brownfield site known as the former Gristmill Warehouse that forms part of the land on the east side of Winchelsea Road the subject of draft Neighbourhood Plan (NP) Policy H5. Martello are concerned about two aspects of the Policy. Firstly, the mixed use allocation covers an extensive area along the eastern side of Winchelsea Road that includes two existing dwellings. The draft policy refers to "a mixed use development of up to 10 dwellings..." and it is not clear if this relates to a net increase having regard to the two existing dwellings located within the allocated area. Given the NPPF (2018) stated need to significantly boost housing supply (especially as there is less than 5-years supply currently available in the District) and given the stated need to make fully effective use of previously developed land to deliver housing, the allocation of just 10 dwellings for the area is too low. If a figure needs to be referred to in the Policy (and NP Policy H1), this should be expressed as a suitable range such as a net increase of between 10-20 dwellings in order to provide for potential higher density redevelopment. Secondly, as acknowledged in paragraph 4.12 of the NP, the area is in mixed ownership, which makes it "challenging" for "integrated planning". The first part of the Policy (part 'a') requires development "to be undertaken on a comprehensive basis and according to an overall masterplan". Given that the allocated area is in a wide mix of ownership (which includes the Environment Agency), it would be inappropriate and meaningless for an Applicant seeking to develop / redevelop part of the allocated area to try and anticipate the future intention of other landowners, and the cost of producing such a masterplan could itself inhibit the viability of a smaller development / redevelopment proposal. This part of the Policy should therefore, be deleted and the wording of paragraph 4.12 amended accordingly. If considered necessary, alternatives to this wording could be substituted along the following lines; "Development of any part of the allocated area shall be undertaken in a form that will not prejudice opportunities for the remaining part of the area or objectives of the Policy"	yes	yes
RYE/R16/2019/10b	Martello Developments Ltd		Mike Pickup	Town & Country Planning Solutions	chapter 4 para 4.10 Figure/map no. 7	Object	Paragraph 4.10 (relating to Rock Channel) makes reference to Site B (to remain as allotments) and Sites C and D having potential for "windfall small development" over the Plan period. While Sites B, C and D are shown on Figure 7, there is no actual Policy that relates to any of these sites. Indeed, no Policy is needed as the allotments (Site B) are to be protected under 'Green Infrastructure' Policy E2 and in being within the Rye Development Boundary, the potential for 'windfall small development' on Sites C and D would be no different to any other part of the Town that is within the Development Boundary. Paragraph 4.10 should therefore, be amended to omit the last sentence in relation to Sites B, C and D and Figure 7 should be amended to show only Site A in relation to Policy H4.	yes	yes
RYE/R16/2019/10c	Martello Developments Ltd		Mike Pickup	Town & Country Planning Solutions	H1 & H4 Chapter 4 para 4.10	Object	See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31348		
RYE/R16/2019/11a	Nigel Jennings		n/a	n/a	p.5 para 2	Comment	The paragraph refers to RTC having led the NP since 2012. However, on page 9, paragraph 1.1 it states that RTC agreed to make a NP in early 2013. Which is correct?	yes	yes
RYE/R16/2019/11b	Nigel Jennings		n/a	n/a	p.15 Chapter 1 Figure/map no. 2	Comment	It is proposed to extend the development boundary to include Gibbet Marsh and the Freda Gardham site. However, as it is also proposed under policy E2 that the green area of Gibbet Marsh be safeguarded from development. Therefore I would suggest that the green area is not included within the development boundary. Also, while amending the development boundary it would be appropriate to include the primary school in Love Lane which has been built since the last review of the boundary.	yes	yes
RYE/R16/2019/11c	Nigel Jennings		n/a	n/a	p.63 Chapter 4 Policy No: I1	Comment	Please note that the Tilling Green Community Centre is in Mason Road and not Marley Road as stated in the policy	yes	yes
RYE/R16/2019/11d	Nigel Jennings		n/a	n/a	p.64 Chapter 4 para 1	Comment	Please note that Ramsar Sites are internationally designated and not European designated.	yes	yes
RYE/R16/2019/11e	Nigel Jennings		n/a	n/a	Neighbourhood Plan	Comment	See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31349	yes	yes

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RYE/R16/2019/12	Mrs Shelley Gibbon		n/a	n/a	P.72 Chapter 4 Policy E2 para 4.80 Figure/map no. 28	Comment	Policy E2 lists the green infrastructure that will be 'safeguarded from loss or alternative uses'. The list does not include the two allotment sites (shown as 1 & 2 in Figure 28). The two allotment sites are only mentioned in the paragraph 4.80 directly above the Policy E2. I would like clarity in the next draft of the Neighbourhood Plan that both allotments will be 'safeguarded from loss or alternative uses'. The allotments are a treasured part of the town. Allotments encourage people to grow their own food, facilitate the forming of friendships through love of gardening and let wildlife thrive and in turn combat some of the negative elements of the pollution from the A259. Being an allotment holder for the last year has made a huge difference to my life as well as that of my family. Three generations of my family tend the plot, including my two year old daughter who loves to see how her food grows. It has meant fresh air, exercise and a greater sense of being part of the town to which I moved to two years ago. We were welcomed warmly and continue to make new friends and enjoy the community events - which are open to everyone to attend and enjoy.	yes	yes
RYE/R16/2019/13a	Michael Stott		n/a	n/a	Figure/map no. 3	Object	There is no logical reason to include Gibbet Marsh within the Development Boundary as it is proposed to retain the existing use as part car park & open space. It has been clearly demonstrated during the consultation process that there is strong local opposition to development on this site & including it within the boundary will, according to RDC Core Strategy Policy OSS2, define it as an area " where most forms of new development would be acceptable" 'This is unacceptable.	yes	yes
RYE/R16/2019/13b	Michael Stott		n/a	n/a	SHLAA RY7	Object	I object to the inclusion of Rye Hire in the possible housing sites. This is a commercial operation which fulfills a basic service to the building, home improvement & tourist property market. The Neighbourhood Plan states the it intends to support & encourage commercial enterprises within the town so why is it necessary to single out a successful companies site when the allocation of house units proposed in the Neighbourhood Plan is in excess of the required number.	yes	yes
RYE/R16/2019/14	David Bowie Area 4 Spatial Planning Manager (Acting)	Highways England	n/a	n/a	Neighbourhood Plan	Comment	See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31350		
RYE/R16/2019/15	Laurence Wilson		n/a	n/a	Neighbourhood Plan	Comment	It would be good to note how much of Rye's tourism industry relies upon visitors from other EU countries, and to consider provision post-Brexit. I would also like to see, as a community aspiration, improved adult education in Rye—far too limited.	no	yes
RYE/R16/2019/16	David Marlow	Rother District Council	n/a	n/a	Policy RY1 Policy H8 Policy H4 Policy E2 Policy E3	Comment	See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31351		
RYE/R16/2019/17a	Mr Johnathan Jempson	John Jempson & Son Ltd	Mary Davidson	MDA Associates	Policy H1 Chapter 4	Comment	John Jempson & Son Ltd are bringing forward re-development proposals for all three of their major sites in Rye that together will provide much needed new housing and modern employment facilities. However to allow the consolidation of their business onto one site at Harbour Road it is necessary that all three of their sites MUST come forward together and be economically viable if all the existing employment is to be maintained. The two sites in Jempsons ownership that are referenced in the Rye Neighbourhood Plan (RNP) are site H4, Rock Channel and site H6, Winchelsea Road West. Site H4 covers four land parcels identified as Rock Channel Sites A to D and Jempsons control the majority of Parcel A which is the main site for their haulage business and has been for over 150 years. Site H6, Winchelsea Road West, is also part of the Jempson operation and their Palette Force division operates from here. In addition, part of the existing buildings are also sub-let to local businesses. Both sites have dated buildings which are now inefficient and not up to modern day standards. However, Jempsons remains a major employer in the town and between the two sites, there are over 120 employees. The intention is to consolidate the business onto one site at Harbour Road and then release the other two more central sites for residential development which can fund the relocation. It is considered that the RNP does not give sufficient cognisance of these important plans for the company and therefore the relevant policies pertaining to sites H4 and H6 should be amended to better reflect these important considerations. Specifically, in relation to Policy H1, H1(b) allocates Rock Channel for 30 dwellings and H 1 (d) allocates Winchelsea Road West for 20 dwellings. It is considered that these housing numbers must be treated as minimum figures on each site pending further detailed analysis, therefore the wording should be worded to insert "at least" in front of both of the dwelling target figures.	yes	yes

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RYE/R16/2019/17b	Mr Johnathan Jempson	John Jempson & Son Ltd	Mary Davidson	MDA Associates	Policy H2 Chapter 4	Comment	<p>John Jempson & Son Ltd are bringing forward re-development proposals for all three of their major sites in Rye that together will provide much needed new housing and modern employment facilities. However to allow the consolidation of their business onto one site at Harbour Road it is necessary that all three of their sites MUST come forward together and be economically viable if all the existing employment is to be maintained.</p> <p>It is noted that the RNP follows the Rother Core Strategy Policy LHN2 in respect of affordable housing and that developments of 10 or more dwellings should provide 30% of the total as affordable housing.</p> <p>Policy H2 goes on to then require at Criteria a) that affordable housing should be made "indistinguishable from the equivalent market housing" and "be spread carefully through the development".</p> <p>It is considered that this element of Policy H2 is too prescriptive and given the complex design and infrastructure issues that will need to be tackled on each site, matters such as the design and location of the affordable housing should be determined at the detailed design stage as part of the planning application process. We therefore request that Criteria a) under Policy H2 is deleted.</p>		
RYE/R16/2019/17c	Mr Johnathan Jempson	John Jempson & Son Ltd	Mary Davidson	MDA Associates	Policy H4 Chapter 4	Comment	<p>John Jempson & Son Ltd are bringing forward re-development proposals for all three of their major sites in Rye that together will provide much needed new housing and modern employment facilities. However to allow the consolidation of their business onto one site at Harbour Road it is necessary that all three of their sites MUST come forward together and be economically viable if all the existing employment is to be maintained.</p> <p>The Jempson part of site H4(a) is entirely appropriate for redevelopment and particularly for residential to ensure compatibility with the existing housing fronting the Undercliff. This is a large site than can deliver a mix of new housing to meet the identified needs of the town. The site can realistically come forward in the foreseeable future with the relocation of the Jempson business to Harbour Road, as identified in the Rother District Council SHLAA 2013. This document estimates that 35 units could come forward, but this has been reduced to 30 units in the RNP Policy H4 (which also includes the remainder of site H4(a), fronting Rock Channel).</p> <p>In the case of both the Jempson's sites in the RNP (H4 and H6), they have been identified as "mixed use" sites where "a mixed use is preferred, prioritising alternative community uses, affordable housing and then market housing" (para 4.47). In order for Jempson's to be able to assess how best they can deliver a viable relocation programme for their business, they cannot be restricted to this "prioritisation" method and accordingly their sites should not be classified as delivering "mixed use".</p> <p>Given the importance to Jempson's of securing the future of the business in the town, it is considered that Policy H4 Site A should be subdivided to ensure that their specific interests (and site) are referenced in the RNP. This would allow for residential development to come forward on their portion of Site H4A (which would not be subject to the Rother Draft Policy DECS) and that a Development Brief for all of Site A could be prepared which would address the criteria listed at Policy H4 a to f.</p> <p>Policy Amendment To amend Policy H4 to specifically identify the John Jempson & Son Ltd site for residential development to be developed in accordance with a Development Brief to be prepared for all of Site A to incorporate the criteria as set out in the current Policy H4. The reference to 30 dwellings should also be amended in line with Policy H1 to say "at least".</p>	yes	yes
RYE/R16/2019/17d	Mr Johnathan Jempson	John Jempson & Son Ltd	Mary Davidson	MDA Associates	Policy E1 Chapter 4	Comment	<p>John Jempson & Son Ltd are bringing forward re-development proposals for all three of their major sites in Rye that together will provide much needed new housing and modern employment facilities. However to allow the consolidation of their business onto one site at Harbour Road it is necessary that all three of their sites MUST come forward together and be economically viable if all the existing employment is to be maintained.</p> <p>We request an amendment to the development boundary (Policy E1) as identified on the key plan at page 70. This is in relation to Site H6 as the development plan as currently drawn does not reflect the position on the ground and the extent of the existing employment site. The proposed amendment to this development boundary is shown on the attached plan. The additional land will be required for Policy H6 development to ensure that there is sufficient space for the flood defense works, landscaping and open space. Furthermore, the area is not shown as being designated or protected on Figure 26 at page 65.</p> <p>This proposed amendment to the development boundary will then need to be carried forward onto Appendix B - Policies Map on Page 108.</p> <p>Supporting information supplied here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31278</p>	yes	yes

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RYE/R16/2019/17e	Mr Johnathan Jempson	John Jempson & Son Ltd	Mary Davidson	MDA Associates	Chapter 4 para 4.47	Comment	<p>John Jempson & Son Ltd are bringing forward re-development proposals for all three of their major sites in Rye that together will provide much needed new housing and modern employment facilities. However to allow the consolidation of their business onto one site at Harbour Road it is necessary that all three of their sites MUST come forward together and be economically viable if all the existing employment is to be maintained.</p> <p>An objection has been made to Policy DECS of the Development and Site Allocations Document prepared by Rother District Council on the basis that this Policy should only apply to existing employment sites which are retained for that purpose.</p> <p>In the case of the Jempson's sites in the RNP (H4 and H6), these have been identified as "mixed use" sites where "a mixed use is preferred, prioritising alternative community uses, affordable housing and then market housing" (para 4.47). In order for Jempson's to be able to assess how best they can deliver a viable relocation programme for their business, they cannot be restricted to this "prioritisation" method and accordingly should not be classified as "mixed use".</p> <p>Therefore, the reference at Para 4.47 to Policy DECS, it should be noted that in the case of the Jempson sites at Sites H4 and H6 that this "mixed use" preference will not occur nor "prioritising" of uses. The last sentence of this paragraph states that "in some cases sites have been allocated in planning for housing where the land is brownfield or vacated because of relocation of business to more modern facilities in Rye Harbour." These sites should all be referenced at this point, including the Jempson sites at H4 and H6, as they meet these very criteria.</p>		
RYE/R16/2019/17f	Mr Johnathan Jempson	John Jempson & Son Ltd	Mary Davidson	MDA Associates	Policy H6 Chapter 4	Comment	<p>John Jempson & Son Ltd are bringing forward re-development proposals for all three of their major sites in Rye that together will provide much needed new housing and modern employment facilities. However to allow the consolidation of their business onto one site at Harbour Road it is necessary that all three of their sites MUST come forward together and be economically viable if all the existing employment is to be maintained.</p> <p>This Jempson's site is entirely appropriate for redevelopment and particularly for residential. This is a large site than can deliver a mix of new housing to meet the identified needs of the town. The site can realistically come forward in the foreseeable future.</p> <p>As identified in the Sustainability Appraisal - Environmental Report (pg 40, para 6.9) this is a sustainable site in an accessible location on previously developed land within the Development Boundary but with some flood mitigation necessary. Therefore the relocation of the existing tenants and the Jempson business as well as the issue of flood risk have now been resolved as far as this site is concerned. Therefore, the previous estimate of 10 units given in the Rather SHLAA has been upgraded to 20 units in the RNP.</p> <p>Again, this is an important site to come forward for development in the town and given the ability of the landowner to relocate all of the existing businesses to more appropriate premises at Harbour Road, this allocation should become a housing allocation as opposed to one for "mixed use development".</p> <p>Therefore Policy H6 should be amended to replace "mixed use development" for "residential development of at least 20 dwellings". Again, any reference to the Draft Rother Local Plan DECS should not apply to this site given the need for Jempson to achieve an economically viable solution for their business relocation. As well as the change to Policy H6, we are also requesting an amendment to the site boundary for this allocation. The site as identified on Figure 9 does not reflect the full landownership nor the existing area that is in use for employment purposes. The proposed amendment to this plan is shown attached: http://www.rother.gov.uk/CHttpHandler.ashx?id=31279</p> <p>It is noted on the plan that accompanies the Rather District Council SHLAA (RY36) that the site boundary differs to the site boundary line shown on the RNP for Site H6. It is necessary to include the rest of this site within the overall allocation to allow for the required flood defense works, landscaping and open space.</p>		
RYE/R16/2019/18	Lois Benton		n/a	n/a	Neighbourhood Plan	Object	<p>As a resident of Udimore Road, Rye, whose property overlooks the green overflow car park area of Gibbet Marsh, I am writing to express my grave concern at the proposal in the Rye Neighbourhood Plan to extend the "Development Boundary" to include Gibbet Marsh.</p> <p>Gibbet Marsh is both a car park and green space enjoyed by countless residents and visitors every year.</p> <p>With the dire parking situation within Rye town, it is vital that we retain the car park and overflow area.</p> <p>Further development of this area is totally unacceptable.</p>		
RYE/R16/2019/19	Paul Barker	Rye Commuter Group	n/a	n/a	Neighbourhood Plan	Comment	<p>Need more dedicated commuter parking at station to avoid issue on Thursday when commuters can not park after 0730</p>	no	yes
RYE/R16/2019/20	Julian Lockett	Rye Conservation Society	n/a	n/a			<p>See report: http://www.rother.gov.uk/CHttpHandler.ashx?id=31283</p> <p>Appendices: http://www.rother.gov.uk/CHttpHandler.ashx?id=31280 http://www.rother.gov.uk/CHttpHandler.ashx?id=31281 http://www.rother.gov.uk/CHttpHandler.ashx?id=31282</p>		

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RYE/R16/2019/21a	Chris Flavin	East Sussex CC	n/a	n/a	Neighbourhood Plan		See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31277	no	yes
RYE/R16/2019/21b	Chris Flavin	East Sussex CC	n/a	n/a	E1	Comment	<p>Minerals and Waste Planning Policy</p> <p>Section 1 - Introduction</p> <p>On page 9, paragraph 1.3 refers to national planning policy and the Rother DC Core Strategy. However there is no mention of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan or the Waste and Minerals Sites Plan (together making the Waste and Minerals Local Plan), which form part of the Development Plan for Rye parish. It is requested that text be added recognising these plans and the wider Development Plan.</p> <p>In paragraph 6.3, under the section titled 'Development Management', it is stated that Rother District Council will be responsible for determining planning applications for development within Rye parish. However, East Sussex County Council is also responsible for determining some types of planning application within the parish. We would request the addition of text recognising this, as well as reference to the Waste and Minerals Local Plan.</p> <p>Policy E1 'Development Boundary, Strategic Gap and Setting of Rye'</p> <p>The removal of all reference to a proposed Strategic Gap extension from this policy and from the Policies Map in Appendix B is welcomed, as there is a safeguarded mineral wharf in the area which this proposed extension previously covered.</p> <p>It is also noted that Policy E1 is referred to as 'Strategic and Green Gaps' in the List of Planning Policies on page 3, a different title to the one given to the policy on page 69. It is suggested that this is corrected so that the policy title is the same in both locations.</p>	no	yes
RYE/R16/2019/21c	Chris Flavin	East Sussex CC	n/a	n/a	Ecology	Comment	<p>Ecology</p> <p>We note that paragraphs 3.9 and 4.72 (previously 4.69) have been amended to include reference to Local Wildlife Sites (LWS) as recommended. However, the reference to Sites of Nature Conservation Importance (SNCI) should be removed –as Local Wildlife Sites have now replaced SNCI's (LWS were previously known as SNCIs and therefore they are the same thing).</p> <p>Policies H3 to H8 have been amended to include reference to an Ecological Impact Assessment (EclA). However, they state that any application may need to be informed by an EclA. This should be amended to any application will need to be informed. This also applies to Policy B3 which relates to a site adjacent to a LWS.</p> <p>Policy F1 'Reducing Flood Risk' has not been amended as recommended and therefore runs the risk that habitats and species which are not legally protected or within statutory sites may not be considered. We would therefore like to re-iterate our previous comments on Policy F1, as below:</p> <p>Whilst the need to take into account the impacts of flood mitigation measures on wildlife is fully supported, the reference to habitats and wildlife "which are protected by national and international designations" may mean that habitats and species which are not legally protected or within statutory sites, may not be considered. This may include Habitats or Species of Principal Importance (listed under Section 41 of the NERC Act), Local Wildlife Sites or habitats and species that are Sussex rare. It is therefore recommended that the text in point (g) is amended to just "the impact of any flood mitigation measures on habitats and wildlife".</p>	no	yes

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RYE/R16/2019/21d	Chris Flavin	East Sussex CC	n/a	n/a	Highways Authority	Comment	<p>Highways Authority</p> <p>Policy H8 identifies the need for the access to the site to be carefully designed, in part to avoid conflict with the nearby level crossing. Whilst we support this policy criteria, we would request that paragraph 4.19 (supporting text to the policy) also identifies the need for early consultation with the County Council, in our role as the Highways Authority. It should also be borne in mind that there is a current planning application for 72 residential units on this site. The County Council had raised concerns over the proposed access arrangements for this application. However, this concern has been subsequently addressed to the satisfaction of the County Council. Although we still have outstanding concerns that remain to be addressed as part of this application, we are content with the proposed allocation in the Neighbourhood Plan.</p> <p>Policy T2 (Car Parking) sets out the expected levels of parking provision in new residential developments in the plan area. Whilst the expected levels of car parking provision are broadly in line with the County Council's Parking Guidance and Parking Calculator, it needs to be recognised that there may be instances where lower levels of provision could be acceptable. Our interpretation of the policy is that such flexibility is provided as the policy would allow a lower level of parking to be provided, subject to appropriate justification.</p> <p>Whilst we welcome reference being made to the need to provide cycle parking, we would ask that the policy and/or the supporting text makes it clear that the level of cycle parking provision should be in accordance with the County Council's Parking Guidance, which includes a table setting out the level of cycle parking provision to be expected in new residential developments.</p> <p>Finally, it should be recognised that footnote 45 (page 60 of the Neighbourhood Plan) provides a link to the incorrect version of the County Council's Parking Guidance. The version that should be referred to, and should have been considered in the formulation of the Neighbourhood Plan, was adopted in October 2017 and can be viewed at: https://www.eastsussex.gov.uk/media/9311/escs-guidance-for-parking-at-residential-developments.pdf</p> <p>□</p>	no	yes
RYE/R16/2019/21e	Chris Flavin	East Sussex CC	n/a	n/a	Flood Risk	Comment	See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31356	no	yes
RYE/R16/2019/21f	Chris Flavin	East Sussex CC	n/a	n/a	Economic Development	Comment	<p>Economic Development</p> <p>The former Freda Gardham site contains the Rye Creative Centre and the former school site at Tilling Green contains a community centre. Both of these uses are bringing community and economic benefits for the area. In light of this, we support the policy criteria in Policy H3 that seeks the retention of the community centre as part of the development of the former Tilling Green School site for residential. We would also request that recognition is given to the current Creative Centre on the former Freda Gardham school site. Given the employment provision that this Centre provides, along with the wider community benefits, we would ask that Policy H7 contains a policy criteria that either seeks the retention of this use, or its re-provision in the locality, as part of the sites development for housing.</p>	no	yes
RYE/R16/2019/22	Andrew Polley	Rye Hire Ltd	n/a	n/a	SHLAARY7 p.37	Comment	I object to the inclusion of Rye Hire as a possible housing site. This is my business which provides a service to the local building, gardening and home improvement markets. We also provide a valuable tourist facility in respect of cycle and wheelchair hire. The Neighbourhood Plan states the intention to support and encourage commercial enterprises within the town so why would housing be encouraged on a successful and locally useful site when the allocation of housing units proposed in the Neighbourhood Plan is in excess of the required number.	yes	yes
RYE/R16/2019/23	Mrs Leslie Guttery		n/a	n/a	Neighbourhood Plan	Object	As a resident with a property bordering the Gibbet's Marsh, I object to any proposal to develop the Gibbet's Marsh site in any shape or form. We already have the burden of heavy traffic at the front which is mitigated by the rural outlook with wildlife at the rear.	No	yes
RYE/R16/2019/24	Philip Mullane		n/a	n/a	Policy no. E4 p.72 Chapter no.4 para 4.80	Comment	<p>My concern relates to the status of the historical allotment sites referred to in paragraph 4.80 and identified as Allotments 1 & 2 on Map 28. It seems essential that they are given the same status as the local green spaces A-L as shown in the Green Infrastructure Policy E.2. The allotments should be afforded the same protection and thereby safeguarded from loss or alternative uses.</p> <p>I relocated to Rye in 2017 and intend to remain here close to family. I have realised how vital is the provision of green spaces and allotments in a town that suffers from excessive traffic flow and congestion. Any proposed reduction in these facilities would, in my view, be unacceptable and against the interest of the local community and its residents.</p>	yes	yes
RYE/R16/2019/25	Amy Croombs	Natural England	n/a	n/a	H1, H8, F1, B3, E1, E2		See full rep here: http://www.rother.gov.uk/CHttpHandler.ashx?id=31352		