

RNPSG - Update on RNP Issues for Feb 2017

1.The RNP: We have secured a follow on bid from national support body, Locality for funds for a further consultancy with the aim of making our SEA more robust. Having approached Planning Aid/RTPI, we learnt that the job was too small for AECOM and so I have turned back to Action in Rural Sussex (AIRS), which has some qualified (Town Planners familiar with NPs) sub contractors. We have signed the contract with AIRS and already we have a draft scoping report from the consultant. The Aim is to complete and pay for this work in this (2016/2017) FY.

Once we have a robust SEA then we can invite Rother DC to go to Reg 14 consultation. The scoping report sets out the broad impacts of the RNP on the environment and has been circulated to the Environment Agency, English Heritage and Natural England for further comments; some commented one year ago. ESCC Traffic Policy has already seen the report, visited Rye to look at the proposed development sites and made some broad recommendations. Their full report will come later.

2.Government Policy: Councillors will be aware of the Housing White Paper 2017 (details on our website, Facebook and below) which was pitched as a series of measures to sort the "broken housing market". The launch of the Paper was rather overshadowed by Brexit debate. There is early criticism of the Paper that it is too modest and fails to hit the mark. Early analysis would indicate that there is little to impact on NPlanning, as we first feared. We await further advice from Rother DC, particularly around the challenge of meeting the 3/5 year housing supply targets. Concurrent with the White Paper the Neighbourhood Planning Bill is being considered by the upper House. <http://services.parliament.uk/bills/2016-17/neighbourhoodplanning.html>. Finally, and to some surprise, there is now a review of the Community Infrastructure Levy (CIL). Some points on all these three are enclosed below.

3. Events and Contacts.

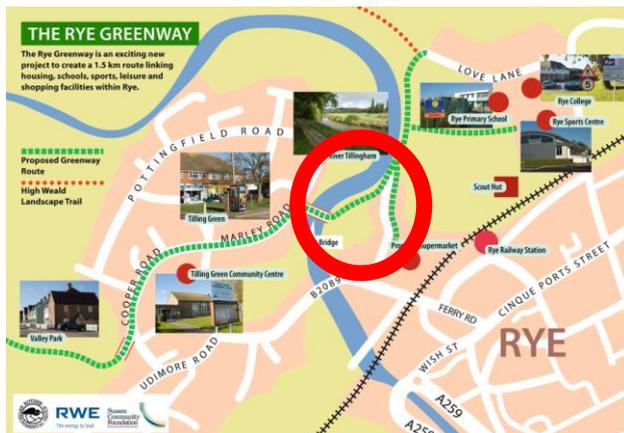
-ATBK attended the inaugural and informal Rother NP Liaison Group, drawn together by Seddlescombe in Etchingam. Nearly all NP groups across Rother were represented. We had two hours of interesting discussion about the state of play in the Neighbourhood Planning world. I raised: handling the CIL charge, tackling the SEA and the perceived impacts of the White Paper and NP Bill above. Rother Officers were not present but at my suggestion intend to attend the next event.

-ATBK met with ESCC traffic policy officers to discuss traffic impacts of the development sites identified in the RNP. An outline of what was discussed during the visit is below:

| Development Location | Comments |
|----------------------|----------|
| Valley Park | No issue |
| Tilling Green School | No issue |

| | |
|------------------------------|---|
| Gibbet Marsh | Difficult. Would need access improved and widened, including removal of up to two trees to improve the "splays". Would certainly need further study and design. |
| Lower School Site – Ferry Rd | Difficult because of proximity to rail crossing and egress for Fire Service and footfall. Might need staggered junction to improve "splays". Needs careful design for where vehicles and pedestrians cross. |
| Winchelsea RD West: | Difficult. Poor vision. Needs detailed study and design. |
| Winchelsea Rd East | No issue |
| Rock Channel | Difficult access to A259; would require more study and design. Status of St Margaret's Terrace and current parking there needs clarification. |
| Freda Gardham School | No issue. Two options for access. Vision is uninterrupted, but would need better signage/markings. |
| Other Locations | Comments |
| Harbour Rd | Difficult; Needs data, study and careful design |
| Station Approach | Some work done as part of S106 for Sainsburys. Now needs comprehensive study and design. Some good examples of redesigned multi use urban locations in East Sussex include in Lewes. |
| A259 | Difficult. Strategic road. Needs data including pollution check (Rother DC). Any signage or calming measures would need detailed study to ensure flow and safety. Same would apply to Udimore and Military Roads. |

-Led by Architect Dominic Manning, there is movement to press for implementation of the "Greenway" cycle/foot way, particularly the bridge over the Tillingham. We are approaching the Environment Agency about feasibility, design and costs. This proposal is supported in the RNP.



-Cllr Keith Glazier has reported that he was asking for higher authorities' current views about any bypass. He has also underscored that he was consulting further about the A259 issues.

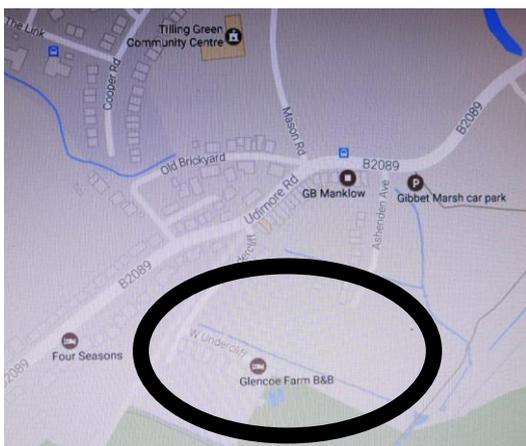
- We have been approached by Aroncorps about the Valley Park “top site” (west of the Udimore Rd roundabout – see below). We underscored the existing lines that proposals to develop there would probably meet with resistance from Rye TC and Rother DC.



-An occupant of Hilltop Drive, Rye Hill (Rye Foreign) has asked about a proposal by a company to develop SHLAA listed RY13 (red site [no development]) image below. We have suggested the RNP does not support development of the “green areas” between settlements, but initially it was a matter for Rye Foreign.



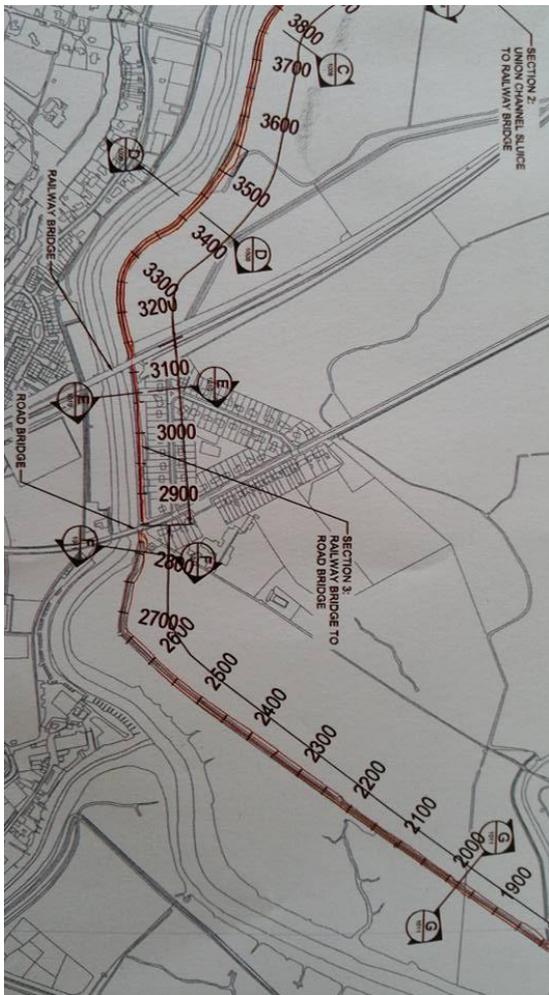
-There have been enquiries about Glencoe Farm, with a view to seeking advice about a proposal for multiple dwellings on the site (see below). Rother DC advise that this was last proposed in 1981, was rejected and does not feature in the RNP.



-The Adelaide Pub and adjacent cottages: following recent enquiries by Cllr Harkness about this location, Developer Icen, which owns the LSS Site and is working to tackle flood risk, state that they own the Adelaide but not the cottages. It is presumed that Tesco retains ownership of the cottages as part of their national land bank.

-We have been in contact with the project Leader of the Eastern Rother Tidal Walls Scheme (Map below) to discuss the future mitigation of flood risk in the area east of the Monkbretton Bridge. She has provided up to date information on their planning data and intentions for the flood defence scheme, which should be built (subject to approvals) by 2022. As part of their business plan, the Environment Agency is seeking advice about the possibility of then benefiting from developer's contributions by anyone proposing development on the former Freda Gardham School. We underscored that there was no developer in immediate prospect but two statements

of interest had been received in the last two years. The Team advise that they plan to hold an open event towards the end of March to brief the occupants of New Road /Kings Avenue and other interested parties.



- Press: There have been pieces in Rye News about the Plan, to which we have been contributing. There is also contact with the three "traffic groups" which have been formed by citizens to lobby for improvements along the A259 and the Military Road. Others from the Udimore Rd are also uneasy about their situation and individuals have commented on pieces on our Facebook Page. To date the issues raised are reflected in the RNP and tackled in the aspirations section. Separately certain Councillors, Highways and others are addressing the issues with a view to providing solutions.

A leaflet has been prepared for the Annual Town Meeting

Government Policy

White Paper: *The Government says that, in order to kickstart house-building, the “housing white paper aims to simplify plan-making so it is easier for communities to produce plans and for developers to follow them”.* Among the main proposals in the white paper are:

- Every local authority will have to draw up and regularly review an “honest assessment” of local housing need.
- Developers forced to build within two years of gaining planning permission, or see it lapse. Currently permission lapses after three years.
- An expanded and more flexible affordable homes programme, for housing associations and local authorities, with £7.1bn of already announced funding. “We will provide clarity over future rent levels. In return, we expect them to build significantly more affordable homes over the current parliament.”
- Smaller building firms will be given assistance to expand, including support for off-site construction, where parts of homes are assembled in a factory.
- An end to “leasehold abuse” by which home buyers are locked into leases with spiralling ground rents.
- Encouragement for “build to let” where private companies build large-volume rental flats for tenants.

CIL Review: There is an important adjunct to the Housing White Paper: the CIL review! Councillors will know that CIL is an important incentive for Neighbourhoods to Neighbourhood Plan. The Review recommends that ***the Government should replace the Community Infrastructure Levy with a hybrid system of a broad and low level Local Infrastructure Tariff (LIT)*** and Section 106 for larger developments. Other recommendations include:

- LIT should be calculated using a national formula based on local market value set at a rate of £ per square metre (presently GBP 135 per sq m for dwelling in Rye; average 3 bed home is around 85sqm; therefore CIL would be around GBP 11k)
- Government should devise a LIT formula for commercial development that ties it to the residential rate but which does not exceed it
- there should be no (or very few) exemptions to the LIT
- examination process should be replaced by a simple mechanism to address any representations on coverage of the LIT rates
- requirement for a Regulation 123 list should be removed and spending of the LIT should be reported through the Authorities’ Monitoring Report

- small developments (10 units or less) should pay only the LIT and no other obligations, unless exceptional circumstances apply
- for large/strategic developments local authorities should be able to negotiate additional and specific Section 106 arrangements
- pooling restrictions set out in Regulation 123 should be removed
- that the Government considers amendments to the regulations as an interim measure to address the most immediate issues arising from CIL
- that a LIT should be a mandatory charge except where it would bring in insufficient funds to justify the cost of collection
- that Government allows for sufficient transitional arrangements to be put in place. 2020 would appear to be a sensible date for transition to be introduced. "

Neighbourhood Planning Bill:

The Government has underscored the fact that the concept of Neighbourhood Planning, which was introduced through the Localism Act 2011 remains a vital facet of the government's manifesto to give more say to local people. The government believes giving communities a measure of control over local affairs boosts local housing supply, with recent analysis showing areas with plans in force have on average 10 per cent more homes planned than those set out by local planning authorities. A fresh Bill, which strengthens neighbourhood planning is being scrutinised in the Upper House. A number of amendments to the Bill have been tabled, with a view to:

-Having local planning authorities consult neighbourhood planning bodies on decisions to grant planning permissions. Where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should **not normally** be granted. Proactive communities bringing forward neighbourhood plans are often frustrated that their plan is undermined because the local planning authority cannot demonstrate a five-year land supply of deliverable housing sites. At the time of the last planning seminar in Bexhill, Rother DC officers explained that the Rother was facing this challenge (5700 net to be built by 2028; so far only 855 completed)

-Making sure that, as more communities take up the opportunity to shape their area planning policy is suitable for a system with growing neighbourhood plan coverage.

-Building on proposals to further strengthen neighbourhood planning by making clear that where communities plan for housing in their area in a neighbourhood plan, those plans should not be deemed to be out-of-date unless there is a significant lack of land supply for housing in the wider local authority area.