Rye Neighbourhood Plan

Strategic Environmental Assessment
Scoping Report

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<th>Comments</th>
<th>Date Prepared</th>
<th>By Whom</th>
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<td>RNPSG April 2014</td>
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Chapter 1 - Introduction

Rye Neighbourhood Plan (RNP)

1.1 Rye Civil Parish was designated as a Neighbourhood Area by Rother District Council on 4 November 2013. The Neighbourhood Area covers the whole of Rye Parish administrative area (Map in Appendix A). This was the first formal step in the preparation of a Neighbourhood Plan in accordance with the Neighbourhood Planning (General) Regulations 2012 and using the powers provided by the Localism Act 2011. Rye Town Council has been recognised by Rother District Council as the ‘qualifying body’ under this legislation to prepare a Neighbourhood Plan on behalf of the community of Rye. Rye Town Council has appointed a Steering Group of Councillors and selected citizens to steer the work.

1.2 The Rye Neighbourhood Plan, once completed, would be made part of the statutory development plan for the area, which must be taken into account when determining applications for planning permission. The development plan for the area also includes the Rother Local Plan Core Strategy (adopted September 2014) and the Rother Development and Site Allocations Local Plan once it is adopted.

1.3 The vision for the Rye Neighbourhood Plan is ‘a thriving town for the 21st Century’ and the strategic objective is:

“to plan a strategic and coherent development of Rye with the aim of improving the economic and social well-being of the community, considering in particular its role as a market town, a centre for tourism, leisure and culture; its enterprise and its commercial and fishing port, all in the context of its historic maritime character, which should be conserved and its vulnerability to flooding”.

Strategic Environmental Assessment

1.4 A Strategic Environmental Assessment (SEA) looks at the likely impact of any plan which may have significant environmental effects. It provides the mechanism for considering and communicating the likely environmental impacts of the draft plan, and its alternatives, with a view to avoiding and mitigating adverse impacts and maximising the positives. The requirement for a SEA is set out in the EU Directive 2001/42/EC which has been adopted into UK law as the ‘Environmental Assessment of Plans or Programmes Regulations 2004’. There are three formal stages for a SEA:

- A screening opinion to establish whether a SEA is required;
- A scoping report setting out how it is intended to carry out the SEA; and
• An environmental report which tests the reasonable alternatives for the Neighbourhood Plan policies against agreed environmental objectives.

1.5 The Steering Group on behalf of Rye Town Council, sought a screening opinion from Rother District Council on the need for a SEA. The response is included at Appendix B and concluded that SEA is required for the Rye Neighbourhood Plan.

This Scoping Report

1.6 This Scoping Report forms part of the Strategic Environmental Assessment of the Rye Neighbourhood Plan. It sets out the context and objectives, establishes the baseline information and explains the scope of the SEA. The report is structured as follows:

• Other Plans and Programmes – identifies other documents that will influence the Rye Neighbourhood Plan;
• Context and Baseline Information – establishes the existing situation and future trends in Rye parish and adjacent areas where they impact on Rye;
• Environmental Issues – identifies the main environmental issues in Rye which the Neighbourhood Plan may affect;
• Appraisal Framework – explains how the SEA will be carried out including the environmental objectives against which the Neighbourhood Plan and its reasonable alternatives will be assessed;
• Next Steps – explains the next stages in the SEA and Neighbourhood Plan preparation processes.

1.7 This Scoping Report is the subject of a statutory 5-week consultation with the following organisations:

• Natural England
• Historic England
• Environment Agency
• East Sussex County Council
• Rother District Council

1.8 The comments and responses received to this consultation will feed into the Environmental Report of the SEA and the draft Neighbourhood Plan, which will both be published for consultation in spring 2017.
Chapter 2 – Other Plans and Programmes

2.1 The Rye Neighbourhood Plan will be influenced by many other existing plans and programmes, some of which will deal with environmental issues in the area. A full list of the key relevant plans and programmes is included at Appendix C. This chapter summarises those which will have the most significant influence on the content of the Neighbourhood Plan.

National Planning Policy

2.2 A Neighbourhood Plan is required to have regard to national policies and advice contained in guidance issued by the Secretary of State. Most of this is contained within the National Planning Policy Framework (NPPF) or the National Planning Practice Guidance (PPG).

2.3 The NPPF has a presumption in favour of sustainable development at its heart. This means that communities engaged in Neighbourhood Planning must develop plans that support the strategic development needs set out in Local Plans and plan positively to shape and direct sustainable development in their area.

Local Planning Policy

2.4 A Neighbourhood Plan is also required to be in general conformity with the strategic policies contained in the development plan for the area of the authority. The approved development plan for this area currently comprises the Rother Local Plan Core Strategy, adopted September 2014. This sets the overall vision and objectives and strategic policies for development in Rother district for the period up to 2028. It sets targets for dwellings and business floor-space over the period. There are also some ‘saved policies’ from the Rother District Local Plan 2006 which will remain part of the development plan until they are superseded.

2.5 The District Council has also recently published a consultation draft Development and Site Allocations Plan (DaSA) which includes more detailed policies and site allocations. Whilst not yet part of the approved development plan, it is being prepared in parallel with the Rye Neighbourhood Plan and it will be important to ensure that the two documents are not in conflict with each other.

2.6 The key Local Plan policies of relevance to the Rye Neighbourhood Plan are indicated in the following table, however it will also need to be in general conformity with the generic policies in the Core Strategy.

<table>
<thead>
<tr>
<th>Policy</th>
<th>Content</th>
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5
### Rother Local Plan Core Strategy

<table>
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<th>Code</th>
<th>Description</th>
<th>Details</th>
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<td>OSS1</td>
<td>Overall spatial strategy including district housing numbers and commitment to “provide for some development in Battle and Rye that helps maintain their small market town roles and is consistent with their respective environmental constraints and settings”.</td>
<td>Sets strategic purpose of development in Rye.</td>
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<tr>
<td>RY1</td>
<td>Policy Framework for Rye and Rye Harbour</td>
<td>Key strategic policy guiding the details of the Neighbourhood Plan.</td>
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#### RY1

Proposals for development and change in Rye and Rye Harbour Village will:

(i) Promote efficiencies and improvements to the strategic transport network to improve connectivity between Rye and other major urban centres;

(ii) Support traffic management on the local road network, promote sustainable alternatives to the car and implement the objectives stated in Local Transport Plan 3 and the Rye Local Area Transport Strategy;

(iii) Preserve and enhance the character and historic environment of the Citadel and wider Conservation Area, and the distinctive landscape setting of the town;

(iv) Retain the centre of Rye as the main focus for retail and services for the town, and increase the choice of convenience shopping in Rye by facilitating the increase of some 1,650 sq m net additional convenience floorspace within or adjacent to the town centre;

(v) Provide between 355-400 dwellings net additional dwellings between 2011 and 2028. Opportunities for growth will primarily be sought within the built up area of Rye;

(vi) Seek to secure and maintain effective flood defences for Rye and Rye Harbour, whilst also minimising and managing flood risk, including in relation to the location of new development in accordance with other criteria;

(vii) Promote at least 10,000 sq m of employment floorspace at Rye Harbour Road.
industrial estate to promote economic regeneration and job creation, having particular regard to protecting the integrity of internationally designated habitats;
(viii) Maintain and enhance navigation on the River Rother and the viability of the Port of Rye as a working harbour, having particular regard to protecting the integrity of internationally designated habitats;
(ix) Promote green tourism initiatives, including careful management of Rye Harbour Nature Reserve and, where feasible, new habitat creation and green infrastructure linkages, that protects and enhances the integrity of the internationally important ecological interests;
(x) Tackle social exclusion and promote opportunities for young people to access education, community facilities, employment and leisure;
(xi) Maintain and enhance the community, cultural and tourism assets of both Rye and Rye Harbour village; and
(xii) Maintain a strategic gap between Rock Channel and the industrial estate at Rye Harbour Road.

<table>
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<th>Development and Site Allocations Local Plan (emerging plan)</th>
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Chapter 3 - Context and Baseline Information

Summary of Context

3.1 Rye is an ancient town of national historic importance and high architectural value. It is positioned on a rocky sandstone outcrop at the eastern end of Sussex close to the Kent border. It has been described as “rising like a jewel” from the surrounding Romney Marsh.

3.2 Much of the land that surrounds Rye is within a flood risk area. Flood risk at Rye is complex. Many lower parts are dependent on flood defences to prevent tidal river flooding. A recent tendency to extreme rainfall aggravates fluvial, ground and surface water levels leading to “hydraulic overload” of the combined sewerage system. The result has been localised flooding in up to six known places around Rye.

3.3 The high quality built and natural environment in and around Rye encourages a strong local tourist industry, with both consequential economic benefits but puts pressure on infrastructure and the environment. For its size, Rye is well provided with a wide range of shops, services and community facilities boosted by high numbers of visitors (up to a million per year).

The Environmental Baseline

3.4 This section records the current state of the environment and how it might evolve without implementation of the plan. The environmental characteristics of all of the land affected will be described. Any existing environmental problems which are relevant to the plan are listed. The following environmental factors are summarised below:

- Landscape, Geology and Soil
- Cultural Heritage
- Biodiversity (including flora and fauna)
- Water Quality and Flood Risk
- Accessibility and Climate Change
- Air Quality and Emissions
- Population
- Human Health
3.5 The character and setting of Rye rising from its surrounding marshland provides quality land and waterscape out to the distant hinterland and coast. The setting of the historic core of Rye, the levels and the rivers importantly aid the perception that the core is a citadel, vertically separated from the surrounding plain. From viewpoints within the town the setting provides fine quality views out to the distant landscape and coast.

3.6 The landscape of Rye is determined by its geology and soil. In East Sussex, there are three major land-types: the Weald, sitting on clay; the Downs, low chalk hills cut by north-south rivers, with a narrow belt of very rich soil at their foot; and the marsh, low-lying reclaimed land, to be found in the far east and the Pevensey Levels. Rye sits on a sandstone “plug” (part of the “Hastings Beds”), essentially an extension of the High Weald but much eroded in early times by the sea. To the immediate north and west of Rye the High Weald has been eroded back by the sea to form land locked cliffs. Rye and its environs forms one of the more scenically attractive stretches of coast, important for its amenity and scientific value. The nearby shingle ridges at Winchelsea Beach and Rye Harbour are much altered by continuing gravel extraction, but are still of great interest to nature conservationists.
3.7 A major influence on Rye has been the sea. Local people became very versatile and ingenious in their use of water transport. To the north of Rye around what is called the Isle of Oxney, shipbuilding thrived in the middle ages. Since early Norman times Rye has been a fishing port supplying widely including London. Both Winchelsea and Rye were important ports for the export of wool and the import of wine from Gascony and timber from as far away as the Baltic. Therefore, the tidal rivers and estuary are a key component of Rye’s maritime character. To the south-east the open landscape¹ of Romney Marsh provides a Local Strategic Gap between the town and Rye Harbour Village. The landscape which is adjacent to, but outside the AONB is not of similar quality or character to the wider AONB² landscape and the character is influenced by the hard edge of urban development. Much of the surrounding area to the North and West is within the High Weald Area of Outstanding Natural Beauty³, and there are a number of Ancient Woodlands on the fringes of the parish.

3.8 Rye is comparatively well off in terms of open space compared to other areas of Rother. The Rother DC Green Infrastructure paper (Aug 2011) suggests that it has sufficient quantities of ‘allotments’ and ‘outdoor sports facilities’ but small shortfalls of ‘amenity open space’ and ‘parks and gardens’. The previous 2007 Open Space, Sport and Recreation Study recommended the council concentrate on qualitative improvements to ‘amenity open space’ and ‘accessible natural greenspace’ in the Rye area.

¹ http://publications.naturalengland.org.uk/publication/5701066775592960?category=587130
² http://www.rother.gov.uk/article/2798/The-High-Weald-Area-of-Outstanding-Natural-Beauty-AONB
³ http://publications.naturalengland.org.uk/publication/4706903212949504?category=587130
Cultural Heritage

3.9 The centre of the Parish of Rye comprises a Conservation Area, first designated in 1968 and expanded North East in 1974. The Conservation Area character appraisal assesses the special interest, character and appearance of the historic core of Rye. The document defines and protecting the built elements that contribute to the special character of Rye. The majority of Rye town centre is covered by a conservation area. Details are covered in the RNP. Most of Rye’s listed buildings are within the Conservation Area. Any development that directly affects the setting of either of the conservation area or listed buildings beyond must conserve and enhance the environment.

Figure 1 Rye Conservation Area in Red

3.10. The wider Rye Parish also contains important archaeological remains, including numerous scheduled monuments and is likely to contain a much larger number of sites of recorded archaeological remains (recorded on the Sussex Historic Environment Record (HER) held by the County Council), some of which may also be
of national importance. Indeed, the government’s definition of the historic environment (which may otherwise be thought of as cultural heritage) within the glossary to the NPPF, is very broad, including planted and managed flora as well as all evidence of the past interaction of people and place including surviving physical remains of past human activity, whether visible, buried or submerged. In addition, the lists of ‘designated heritage assets’ (listed buildings, conservation areas, scheduled monuments, registered parks and gardens, battlefields and protected wrecks) are all considered incomplete and should not be relied on as a comprehensive guide to the area’s valued heritage. As such there is potential for further heritage assets of national importance to be present within the plan area, as well as other remains of more local importance that, nevertheless, merit consideration in planning decisions.

The National Planning Policy Framework and the Planning Practice Guidance require that decision-making aims to sustain the significance of all heritage assets, including non-designated assets, such as the archaeological sites and historic buildings recorded on the County HER. Whilst it is not subject to an official ‘heritage designation’ Romney Marsh is a landscape that readily meets the definition of a heritage asset and is identified as such in this report along with the need for the Plan to sustain its significance.

Figure 2 – Romney Marsh

3.11 The ‘trajectory’ of any issues affecting the historic environment impact on decisions within the plan-making process on these as potential ‘cumulative’ impacts
or enhancements can be judged. Issues may include the impact of traffic or past development on the perceived quality of historic areas or places, the loss of archaeological remains without appropriate recording or the deterioration of the fabric of historic buildings or structures either through lack of maintenance or natural processes (such as coastal erosion). Both development pressure and the effects of changing economic activity can also result in issues affecting the historic environment. The conservation area appraisal and extensive urban survey may provide some information on identified issues affecting the area, whilst the community may use their own knowledge of issues. Indeed the SEA provides a useful place to record the community's impressions in order to ensure they are taken into account in decision-making.

**Biodiversity (including flora and fauna)**

3.12 Biodiversity Assets within or close to Rye parish include:

- Local wildlife sites (sites of Nature Conservation Importance)
- Ancient Woodland
- Habitats and species of Principal Importance (Sect 41 of the Natural Environment and Rural Communities Act 2006)
- International Ramsar (wetland habitats) Dungeness to Pett Level (proposed);
- International Special Protection Areas (protection of birds) Dungeness to Pett Level;
- International Special Areas of Conservation (protection of species and habitats) Dungeness (proposed); and
- Rye Harbour Site of Special Scientific Interest (SSSI) and Nature Reserve.

3.13 The Romney Marshes envelope Rye’s southern boundary. The area is home to Rye Harbour Nature Reserve. The area is important for breeding and wintering water birds, birds of prey, passage warblers and breeding sea birds. The cross county ‘Romney Marshes Living Landscape project’ should be a continuing factor

3.14 The Rye Harbour Nature Reserve lies almost entirely within the Rye Harbour Site of Special Scientific Interest (SSSI) (adjacent Icklesham Parish). It has wetland habitat with many wetland birds and cross-county walking and cycling ways. In 1999 the Rye Nature Reserve was recorded as containing in excess of 3,000 plant, bird and other animal species. There is a network of footpaths, bird watching hides and circular walks across the nature reserve. The ESCC Strategic Open Space Study has identified that improved access management at Rye Harbour Nature Reserve will also increase the proportion of residents who reach the 500ha ANGST standard.
3.15 The banks of Rye Harbour have previously been identified as a green corridor, and there may be potential to extend this further into a wider network. The ‘Rye Harbour Farm Habitat Creation Programme’ is an Environment Agency (EA) project aims to restore many of the habitats that once existed in the area. It is re-creating approximately 17 hectares of inter-tidal habitat near Lime Kiln Cottage, restoring many of the shingle ridges and creating new areas of fresh water wetlands at the Winchelsea Beach end of the site. Developing these habitats help to mitigate flood risk.

3.16 Opportunities for biodiversity improvements and urban fringe management exist around Rye. Rye is fringed by two Biodiversity opportunity areas, the ‘Romney Marsh’ Area and the ‘Rother, Brede and Tillingham Woods’ area. The options considered for biodiversity and greenspace include using existing policy mechanisms to enhance and protect natural green spaces where opportunity arises. Alternatively identifying areas where there is potential for improvement and providing a District-wide framework to underpin the provision of strategic green space (using the ANGst2 model to build up an evidence base).

**Water Quality and Flood Risk**

3.17 The EU Water Framework Directive requires that the water environment be protected and improved. Where investment is required to local water or sewer networks this can be financed either by the water companies (i.e. ultimately by customers) or through contributions from developers. Pollutants from the built up areas of new development could potentially be carried into rivers, reservoirs and groundwater by run-off or seepage and adversely affect the quality of water resources and increase the risk of flooding downstream. Rapid run-off can reduce the availability of water for abstraction. Land use planning decisions can therefore significantly impact on water quality and flood risk issues.

3.18 There are 14 flood risk “hotspots” in Sussex identified by East Sussex County Council in its Flood Risk Management Strategy ⁴ which includes Rye. Climate change is likely to increase this flood risk, which has implications for resilience and water quality. With Rye at the confluence of three rivers and under tidal influence, water levels are always of concern, but in recent years, flood defences have been greatly improved with raised and improved river and sea walls, fitted with flood gates on access points. Before any forecast extreme tide, Environment Agency teams close the flood gates and drop the river levels on the Brede and Tillingham to cope with river flow.

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3.19 The tidal surge which hit the east coast of Britain in early December 2013, was considered the “most serious” for 60 years, as not since the floods of 1953, has there been sea levels at a height which threatened homes and infrastructure from the Wash to Sandwich. Since 1953 extensive flood defence work has been undertaken to prepare and defend against extreme tides and water levels, but flood risks do remain. Three factors combine to the surge effect. First there were very high “spring” tides; secondly, low pressure in the North Sea caused water levels to further rise and lastly, strong northerly on-shore winds tend to funnel tidal streams into the relatively enclosed shape of the North Sea. Although the worst effects were felt along the East Coast, as in 2007, there were adverse impacts in the English Channel coast as far as Rye Bay.

3.20 The purple line on the map below shows all flood defences built in the last five years to protect against river floods together with some older defences. The Eastern Rother tidal wall scheme is being planned and would complete the tidal defences of Rye Parish to a height of around 5.8m Above Ordnance Data (AOD). The highest recorded level in recent years was in 2014 at 5.1m AOD. Hatched areas benefit from the flood defences, which if not in place would leave the areas unprotected. It should be underscored that flood defences do not completely remove the chance of flooding, however, and can be overtopped or fail in extreme weather conditions.

3.21 **Flood Zones:** On the map below, the blue area indicates the flood risk zone. There are two different kinds of area shown:

- **Dark blue** shows the area that could be affected by flooding, either from rivers or the sea, if there were no flood defences. This area could be flooded by tidal waters if the flood defence system failed. (For planning and development purposes, this is Flood Zone 3)
- **Light blue** shows the additional extent of an extreme flood from rivers or the sea. (For planning and development purposes, this is Flood Zone 2).

3.22 Where there is no blue shading, flooding from rivers and the sea is unlikely but might be subject to localised “ponding” of surface water caused by extreme rainfall in conditions of high ground water. They might also be subject to spillage from the Combined Sewer System in the same conditions. (For planning and development purposes, this is the same as Flood Zone 1).

*Figure 3 Flood Risk*
Accessibility and Climate Change

3.23 The South East had the highest level of carbon dioxide (CO2) emissions from domestic and road transport sources, as well as the highest overall level of CO2 emissions in 2010, compared with the other English regions. Improving accessibility to services and facilities has the potential to reduce fossil fuel consumption by providing walking and cycling corridors, which can improve general wellbeing, health and fitness, as well as mitigating the impact of climate change. Good accessibility is especially important for disadvantaged groups such as those with specific support needs (older people, young people, single mothers and people with mobility impairment) or those without access to a car.

3.24 Rye is generally well served by services. Rye Town Centre is considered the main service centre in the eastern half of Rother District, with many in the town enjoying journey times of less than 20 minutes to main employment and service centres. A GP surgery is currently located in Rye Hill, however the Conquest Hospital, in the north suburbs of Hastings, is the closest facility is 10 miles. Households without a car are disadvantaged when they are required to make appointments at the Conquest or merely visiting relatives or friends.

3.25 Accessibility to waste services is important not just for transport implications but because the sustainable management of waste also contributes to mitigating climate change. Rother District Council collects household waste and "bulky" items when a charge is made. There are special arrangements for the collection of clinical or
medical waste. There is no recycling centre in Rye. Bulk waste has to be moved to centres at Battle or New Romney. Businesses and non-domestic households are responsible for the disposal of their waste, using a licensed waste disposal contractor.

3.26 The public bus service has emerged from East Sussex County Council’s 2014 review of its supported services in good shape: the 326 Rye Town service (providing transport to/from Udimore Road/Udimore/Broad Oak and from all parts of the town up to the High Street and the Rye Hospital site) now operates without subsidy 6 days a week and the 101 service (formerly the Rye - Hastings (12.7 Miles) section of the 344 route) combines with the existing 100 route to provide half hourly services to Hastings and to Camber/Lydd/Dover Monday to Saturday and hourly on Sundays. Unfortunately passenger numbers are insufficient to justify the subsidy needed for hourly services to Peasmarsh/Beckley/Northiam or Iden/Tenterden (11 miles) and these have reduced to 2-hourly off peak frequency, however an hourly service to and from Rye Harbour (2.5 miles) has been maintained. Naturally there are calls for the reinstatement of the hourly services, for evening services and for more co-ordination of bus and train times, however this last is a complex issue - those going to catch trains have differing views to those arriving on them.

*Figure 4 Rye Bus Routes*
3.27 There are hourly services via the Marsh Link Railway east to Ashford (19 miles) and west to Hastings (12 miles). In recent years there have been improvements to platform information and rolling stock. In the last 2 years there have been proposals to upgrade the link to High Speed from Ashford to Bexhill. This would provide an alternative rail route from the Coast to London for those travelling on the troubled (engineering and programming) Hastings to London line.
3.28 Cycling can play an important part in reducing congestion and improving access to services in East Sussex. SUSTRANS\(^5\) maintain route 2 from East to West across Rye. Within the Parish there are routes south to Rye Harbour and west to Valley Park. All the routes are of good quality, signposted and well used.

*Figure 5 – Cycle Ways*

![Map of Rye showing cycle routes](image)

**Air Quality and Emissions**

3.29 Rother DC provides guidance on air quality\(^6\) and reports on where standards are being breached.\(^7\) The growth of newer diesel vehicles with emission control technology, has given rise to higher emissions of nitrogen dioxide, which has led to increases in localised pollution levels in urban centres. Within the Parish the most concentrations are found along the A259 trunk road where diesel and heavy goods vehicles pass close to dwellings.

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\(^5\) [http://www.sustrans.org.uk/ncn/map/route/rye-ride](http://www.sustrans.org.uk/ncn/map/route/rye-ride)

\(^6\) [http://www.rother.gov.uk/article/193/Air-quality](http://www.rother.gov.uk/article/193/Air-quality)

\(^7\) [http://www.rother.gov.uk/CHttpHandler.ashx?id=27039&p=0](http://www.rother.gov.uk/CHttpHandler.ashx?id=27039&p=0)
3.30 The following statistics and evidence are primarily drawn from the 2011 Census. These are used to provide an overview of the current status of the community. Other sources of data or information are acknowledged where applicable.

3.31 Rye has a usual resident population of around 42558 (2,055 males, 2,200 females) living in 2,485 households. This compares with 90,588 in 40,877 households across Rother District.

- 653 people were aged 15 and under (15.3% of parish population compared to 15.7% across the District and 19% across England);

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8 http://www.eastsussexinfigures.org.uk/webview/index.jsp?mode=area&submode=result&areaname=tn317es&areatype=PA
- 2,490 people were aged 16 to 64 (58.5% of parish population compared to 55.9% across the District and 65% across England);

- 1,112 people were aged 65 and over (26.2% of parish population compared to 28.4% across the District and 16% across England).

### Household Composition

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### Table 1 - Age structure of Parish

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<td>30 to 44</td>
<td>691</td>
<td>16.2</td>
<td>13,026</td>
<td>14.4</td>
</tr>
<tr>
<td>45 to 59</td>
<td>845</td>
<td>19.9</td>
<td>18,576</td>
<td>20.5</td>
</tr>
<tr>
<td>60 to 64</td>
<td>366</td>
<td>8.6</td>
<td>7,962</td>
<td>8.8</td>
</tr>
<tr>
<td>65 to 74</td>
<td>564</td>
<td>13.3</td>
<td>12,265</td>
<td>13.5</td>
</tr>
<tr>
<td>75 to 84</td>
<td>386</td>
<td>9.1</td>
<td>8,874</td>
<td>9.8</td>
</tr>
<tr>
<td>85 to 89</td>
<td>116</td>
<td>2.7</td>
<td>2,836</td>
<td>3.1</td>
</tr>
<tr>
<td>90 and over</td>
<td>46</td>
<td>1.1</td>
<td>1,788</td>
<td>2.0</td>
</tr>
<tr>
<td>All Usual Residents</td>
<td>4,255</td>
<td>100.0</td>
<td>90,588</td>
<td>100.0</td>
</tr>
</tbody>
</table>

Source: Census (2011)
Economic status of residents

3.32 Of the 4,255 usual residents of the Parish, 3,054 were aged between 16 and 74, 2,015 (66.0%) of whom were economically active*:

<table>
<thead>
<tr>
<th>Category</th>
<th>Parish Number</th>
<th>Parish %</th>
<th>District Number</th>
<th>District %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employed full-time</td>
<td>872</td>
<td>28.6</td>
<td>18,498</td>
<td>29.4</td>
</tr>
<tr>
<td>Employed part-time</td>
<td>468</td>
<td>15.3</td>
<td>8,685</td>
<td>13.8</td>
</tr>
<tr>
<td>Self-employed</td>
<td>498</td>
<td>16.3</td>
<td>9,321</td>
<td>14.8</td>
</tr>
<tr>
<td>Unemployed</td>
<td>114</td>
<td>3.7</td>
<td>2,019</td>
<td>3.2</td>
</tr>
<tr>
<td>Full-time students</td>
<td>63</td>
<td>2.1</td>
<td>1,336</td>
<td>2.1</td>
</tr>
</tbody>
</table>

Source: Census (2011)

*Economically Active - All people usually resident in the area at the time of the 2011 Census aged 16 to 74 and who were economically active (either in employment, or not in employment but seeking work and ready to start work within two weeks, or waiting to start a job already obtained). As defined by ONS (2014).

- 1,039 (34.0%) of whom were economically inactive*:

<table>
<thead>
<tr>
<th>Category</th>
<th>Parish Number</th>
<th>Parish %</th>
<th>District Number</th>
<th>District %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retired</td>
<td>626</td>
<td>20.5</td>
<td>14,163</td>
<td>22.5</td>
</tr>
<tr>
<td>Students</td>
<td>86</td>
<td>2.8</td>
<td>2,386</td>
<td>3.8</td>
</tr>
<tr>
<td>Looking after home or family</td>
<td>156</td>
<td>5.1</td>
<td>2,728</td>
<td>4.3</td>
</tr>
<tr>
<td>Long-term sick or disabled</td>
<td>118</td>
<td>3.9</td>
<td>2,551</td>
<td>4.1</td>
</tr>
<tr>
<td>Other</td>
<td>53</td>
<td>1.7</td>
<td>1,174</td>
<td>1.9</td>
</tr>
</tbody>
</table>

Source: Census (2011)

*Economically Inactive - All people usually resident in the area at the time of the 2011 Census aged 16 to 74, who were economically inactive (anyone who was not in employment and did not meet the criteria to be classified as unemployed). As defined by ONS (2014)

Human Health

3.33 The 4,255 usual residents of the Parish were classified as having the following health status:

<table>
<thead>
<tr>
<th>Category</th>
<th>Parish Number</th>
<th>Parish %</th>
<th>District Number</th>
<th>District %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Good Health</td>
<td>1,640</td>
<td>38.5</td>
<td>36,737</td>
<td>40.6</td>
</tr>
<tr>
<td>Good Health</td>
<td>1,586</td>
<td>37.3</td>
<td>33,152</td>
<td>36.6</td>
</tr>
</tbody>
</table>

http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11128120&c=rye&d=16&e=62&g=6421577&i=1001x1003x1032x1004&m=0&r=1&s=1487084532181&enc=1&dsFamilyId=2484
3.34 The Director of Public Health reports about the levels of wellbeing and resilience in 2016/17\textsuperscript{10} across East Sussex. Most residents (86%) were satisfied with their local area as a place to live, compared with only a very few (6%) who are dissatisfied with it. Satisfaction levels are broadly in line with 2008 Place Survey Findings. By district, Rother residents are most likely to be satisfied with their local area (both 88% satisfied). In Rother DC around one third of households have one person with a long term illness.\textsuperscript{11} In common with the national average adult social care is under significant pressure\textsuperscript{12}.

3.35 But increasing obesity is an issue. Dr David Warden, chair of NHS Hastings and Rother Clinical Commissioning Group, has said\textsuperscript{13} “Sadly one in five children in East Sussex area are overweight or obese by the time they reach school age. These children are at risk of poor health including diabetes, low self-esteem, anxiety and depression. And of course the risks increase as overweight children grow up to be overweight adults.”

**Vehicle Accidents\textsuperscript{14}**

3.36 In 2013 there were a total of 1,298 accidents reported in England involving 2,435 vehicles and 1,795 casualties. Of the total casualties reported, 322 (18%) were serious and 17 (1%) were fatal. The rate in East Sussex peaked in 2006-2008 (76.7 per 100,000 population) but steadily reduced from that period to 2010-2012 (58.5 per 100,000 population), however for each period from 2003-05 rates in East Sussex have remained higher than the England average (Figure 1).

3.37 When the data for crashes occurring in East Sussex are broken down by age and gender it is clear that males are more prone to being killed, seriously injured and slightly injured than females, and that generally younger drivers / riders, aged between 17 and 29 are the most at risk age groups. One factor affecting this figure is the large number of motorcyclists who have traditionally travelled for leisure between

\begin{center}
\begin{tabular}{|c|c|c|c|c|}
\hline
Wellbeing & 753 & 17.7 & 14,960 & 16.5 \\
Bad Health & 221 & 5.2 & 4,463 & 4.9 \\
Very Bad Health & 55 & 1.3 & 1,276 & 1.4 \\
\hline
\end{tabular}
\end{center}

Source: Census (2011)

\textsuperscript{12}https://www.eastsussex.gov.uk/media/7453/esbt-and-accountable-care.pdf
\textsuperscript{13}http://www.hastingsandrotherccg.nhs.uk/news/14m-scheme-to-tackle-obesity-in-nursery-schools/#.WKRU6YHyi70
the edges of London and the coast. Rye is a traditional (since the 1960s) gathering place for motorcyclists from across the Southeast.

3.38 However depending on how the ages are grouped together other age groups also emerge as at risk. Of concern, especially for policy makers are the increasing age of the population and the likelihood that more and more people will be driving at an increasingly older age. Life expectancy in the UK is increasing; indeed, according to the Office for National Statistics, by the year 2037 one in 12 of the population will be over 80 years old, more than doubling the 2012 figures. This will present an important local and national policy issue, especially for the elderly living in rural areas of East Sussex as more people that age are likely to be driving and will have the need to drive due to poor public transport. There has been a 72% increase in the number of licence holders over the age of 70 in the last 20 years and this figure is expected to rise dramatically. According to research undertaken on behalf of the Institute of Advanced Motorists, based on conservative estimates, there will be almost two million drivers over the age of 80 years old by 2032.
Chapter 4: Environmental Issues

The following issues have derived from public consultation and advice from Rother District Council. This is not an exhaustive list of all the issues affecting the town but is a summary of the key issues raised by consultees and residents. It may not be possible to address all of them through the Neighbourhood Plan because some matters go beyond the use of land. However, they are important for context to the Neighbourhood Plan.

<table>
<thead>
<tr>
<th>Challenges facing Rye</th>
<th>Effect without the Neighbourhood Plan</th>
</tr>
</thead>
</table>
| 1 Urban creep threatens green spaces and marshland Growth risks sustainability unless measures are incorporated to mitigate. | • Strategic policies may not protect the natural environment around and within the town  
• Protection and intrinsic value of undesignated countryside may be understated  
• There may be increasing waste and inefficiencies in waste handling system  
• There may be increasing consumption of natural resources  
• There may be deteriorating land and soil quality |
| 2 Development could threaten the character and appearance of the landscape and townscape, with adverse impacts on settings of archaeological, historical and cultural heritage importance. Need to protect and enhance the historic buildings and natural environment and character of the parish. | • Important “green spaces” may be allocated for development  
• Use of brown field land may not be optimised  
• The detailed conservation of the character of Rye Citadel and its placing in Romney Marsh may not be protected  
• Development may not enhance Rye’s unique character  
• Over-development at high density may harm the townscape character  
• Listed and heritage buildings may not be conserved  
• The cultural heritage of the medieval Cinque Port may not be optimised  
• Suitable infrastructure and settings for Rye’s festivals and events, which do not impact on residents, may not be achieved |
| 4 Flood risk affects over 1000 dwellings and water quality needs improvement. | • Existing flood defence system may not be maintained and enhanced  
• The efficient use of water may not be encouraged in new development, for example, by using rainwater harvesting and grey water systems |
<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Existing sewage system and treatment works may not be maintained and enhanced</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Water quality may not be improved and the risk of pollution may not be minimised</td>
<td></td>
</tr>
<tr>
<td></td>
<td>New development may not have sufficient waste storage facilities</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The Parish may not have sufficient recycling facilities or domestic waste handling facilities</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Waste collection systems may not be seagull proof</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Need for improved connectivity within the Town.</td>
<td>New and existing parts of the Town may not connect together with efficient pedestrian and cycle routes</td>
</tr>
<tr>
<td>10</td>
<td>Increasing traffic and related pollution with adverse impact on air quality.</td>
<td>There may be increased impacts of traffic speed and adverse impacts on pedestrian safety</td>
</tr>
<tr>
<td></td>
<td>There may be increased constraints on parking</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The use of clean technologies; such as electric car facilities may not be encouraged</td>
<td></td>
</tr>
<tr>
<td></td>
<td>A reduction in through traffic may not be achieved</td>
<td></td>
</tr>
<tr>
<td></td>
<td>A shift to walking and cycling from private cars may not be encouraged by locating new development in accessible sites</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Need to protect and enhance biodiversity and wildlife habitats.</td>
<td>Development may result in adverse impacts on natural habitats.</td>
</tr>
</tbody>
</table>
Chapter 5: Appraisal Framework

5.1 The following environmental objectives have been taken from the Sustainability Appraisal of the Rother District Core Strategy (which incorporated Strategic Environmental Assessment). Objectives 1-8 related to social and economic impacts, so only the environmental objectives 9-16 have been used for this SEA. These are:

a) Improve efficiency in land use and encourage the prudent use of natural resources.
b) Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.
c) Reduce emissions of Greenhouse gases.
d) Minimise the risk of flooding and resulting detriment to people and property.
e) Maintain, improve and manage water resources in a sustainable way.
f) Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats.
g) Protect and enhance the high quality natural and built environment including landscape and townscape character and particularly the protection of the High Weald AONB.
h) Reduce waste generation and disposal, and achieve the sustainable management of waste.

Potential conflicts between objectives

5.2 It is considered that the most likely conflicts are:

- Between a, b and c, for instance where high density development may increase levels of traffic and greenhouse gases; and
- Between d, f and g, for instance where flood defences may affect wetland habitats or be visually unattractive.

Scoring methodology

5.3 The Neighbourhood Plan policies and their reasonable alternatives will be considered against the above SEA objectives with reference to the baseline information to determine the potential environmental effects. The possible outcomes used will be:

++ significant positive effect,
+ partial positive effect,
? uncertain effect,
- partial negative effect,
-- significant negative effect,
n/a not applicable
The following table explains how the environmental objectives will be interpreted in the context of Rye.

<table>
<thead>
<tr>
<th>SEA Objectives</th>
<th>How will these objectives be applied to the Neighbourhood Plan policies or their reasonable alternatives?</th>
</tr>
</thead>
</table>
| a) Improve efficiency in land use and encourage the prudent use of natural resources. | • Will the policy encourage development in places that have good access to essential services by foot, by bicycle and by public transport?  
• Have brownfield sites and sites within Rye been preferred ahead of greenfield sites outside the existing urban boundary?  
• Has the density of sites been optimised to reduce the need for allocating additional sites? |
| b) Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage. | • Will the policy encourage walking and cycling?  
• Will the policy provide adequate parking away from the Town Centre but with connectivity to it?  
• Will the policy encourage the freeing up of the A259 for through traffic? |
| c) Reduce emissions of Greenhouse gases.                                      | • Will the policy promote energy efficiency in new development with clear requirements and targets?  
• Will the policy identify and promote opportunities for greater energy use from renewable resources?  
• Will the policy encourage the use of clean technologies? |
| d) Minimise the risk of flooding and resulting detriment to people and property. | • Will the policy minimise the impacts of flooding by ensuring that flood mitigation schemes are incorporated?  
• Will the policy encourage sustainable urban drainage systems (SUDS) within new development? |
<p>| e) Maintain, improve and manage water resources in a sustainable way.         | • Will the policy encourage reduction in amount of hard surfaces to allow permeability of surface water? |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>
| **f)** Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats. | • Will the policy protect existing areas of ecological importance within the NP area?  
• Will the policy take into account potential impacts of new development on areas of ecological importance outside the NP area, particularly Rye Harbour and Rye Hill?  
• Will the policy require the creation of new green infrastructure that encourages biodiversity and wildlife?  
• Will the policy coordinate existing and new green infrastructure to create a connected network?  
• Will the policy maintain, enhance and increase tree cover and woodlands?  
• Will the policy enhance existing areas of green open space? |
| **g)** Protect and enhance the high quality natural and built environment including landscape and townscape character and particularly the protection of the High Weald AONB. | • Will the policy conserve and enhance Rye’s Conservation Area?  
• Will the policy require development to be sympathetic to the character of Rye and its setting of Romney Marsh and the High Weald AONB?  
• Will the policy support development that enhances key areas that contribute to local distinctiveness?  
• Will the policy conserve and enhance the Town’s listed buildings?  
• Will the policy support the maritime cultural heritage, especially of the medieval Cinque Port?  
• Will the policy prevent excessive light and noise pollution? |
| **h)** Reduce waste generation and disposal, and achieve the sustainable management of waste. | • Will the policy encourage and facilitate the provision of recycling facilities in or close to the existing town?  
• Will the policy require bin and recycling storage to be designed into new residential developments? |
Chapter 6: Next Steps

6.1 The comments and responses received to this consultation will feed into the Environmental Report of the SEA and the draft Neighbourhood Plan, which will both be published for consultation in spring 2017.

6.2 Subsequent to consultation on the draft Rye Neighbourhood Plan and Environmental Report the main issues raised will be identified and addressed by Rye Town Council. Where necessary, further assessment of the options will be undertaken, along with any updating of baseline data, plans and policies. Once the Neighbourhood Plan has been finalised it will then be submitted to Rother DC alongside an updated Environmental Report; a Basic Conditions Statement (showing how the legal requirements for a Neighbourhood Plan have been met); and a ‘Consultation Statement’ that describes issues or concerns raised through the various consultations and how these have been addressed.

6.3 Rother District Council will then ‘publicise’ these documents so that stakeholders can make representations that may then be considered at Examination.

6.4 Rother District Council, in consultation with Rye Town Council, will then appoint an independent Examiner to carry out this Examination. If this is successful then the District Council will hold a Referendum of all Rye residents on the electoral roll to determine whether they wish the Neighbourhood Plan to be used to help determine planning applications. If more than 50% of those who vote agree then the Neighbourhood Plan will be ‘made’ part of the statutory development plan.

6.5 As and when the Rye Neighbourhood Plan is ‘made’ a ‘Strategic Environmental Assessment Statement’ will be published alongside it which will include the measures required to ensure environmental monitoring.
APPENDICES

- Appendix A – Designated Neighbourhood Area for Rye
- Appendix B - Screening Opinion from Rother District Council
- Appendix C – List of Other Plans and Programmes
- Appendix D - Checklist of SEA Scoping Report Requirements
Appendix A – Designated Neighbourhood Area for Rye
Appendix B - Opinion from Rother District Council

Strategic Environmental Assessment - 15 September 2015

Rye NP Steering Group

Following screening, Rother District Council is of the view that Rye Neighbourhood Plan does require an SEA. RDC has consulted with the statutory environmental bodies (SEBs) – Natural England, the Environment Agency and Historic England as part of this process. Both Natural England and Historic England are also of the view that SEA is required while the EA make no comment (although welcoming opportunity for involvement in the development of the Neighbourhood Plan itself).

Rother DC is liaising further with the SEBs regarding the scope of Neighbourhood Plan SEAs and will advise in due course (within 4 weeks) which matters should be considered as part of the SEA.

EU Directive 2001/42

(10) All plans and programmes which are prepared for a number of sectors and which set a framework for future development consent of projects listed in Annexes I and II to Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment (1), and all plans and programmes which have been determined to require assessment pursuant to Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna (2), are likely to have significant effects on the environment, and should as a rule be made subject to systematic environmental assessment. When they determine the use of small areas at local level or are minor modifications to the above plans or programmes, they should be assessed only where Member States determine that they are likely to have significant effects on the environment.

Site Assessment

The work undertaken thus far has been well researched but the focus of the Site Assessment work is residential (understandably given the SHLAA documentation) with minimum consideration of retail requirements or employment which are also policy requirements of RY1 and should be accommodated and considered by the Rye NP. However the SHLAA while important is only one source of evidence of many the NP should refer to. A systematic evaluation of sites is required to avoid challenge from developers during the Examination of the NP. I attach the SHLAA assessment summary and I noted in the NP site assessment ‘heritage’ and ‘highways’ are key omissions and should considered integral as part of the overall assessment of sites work for their potential to accommodate new development whether it be housing, retail or employment. In addition there is no ‘greenbelt’ in Rother I presume you are referring to AONB designation.
I would advise the Rye NP steering group for consistency they must consider alternative uses for each site including the red sites in the SHLAA and any other sites that may have come to their attention since 2013 put forward by 3rd parties.

The neighbourhood planners for example I would suggest adopted the ‘reasonable alternatives’ principle when doing this assessment stipulating this in the write up. This will save time and will not require an comprehensive assessment of all the sites. For example for retail assessment you are guided somewhat by the sequential test as outlined in the PPG. In summary national guidance dictates which sites you should look at for retail. National guidance (NPPF) stipulates you must look at town centre first, edge of centre second and then only then you look beyond that. It follows the Neighbourhood Planners will have to look for retail sites within the town centre (post office site?) and if no suitable site is found you then look at edge of centre (edge of town centre boundary – local plan 2006 designation – former school site) and if you exhaust all options there you look beyond that (Freda Gardham/Gibbet Marsh?).

By taking this ‘reasonable alternatives’ route you will save yourself some time and not for example be required to look at all the red sites in Rye as it will not be necessary. As long as the NP stipulate this in their reasoning the examiner will be able to follow this narrative. This work is necessary to fend off any challenge from developers who will argue that their site has not been given due consideration in the process. Remember the SHLAA was not out to consultation (therefore it has been not challenged) while comprehensive it remains a desktop study.

Norman Kwan
Principal Planning Officer - Strategy and Planning,
Rother District Council,


**Rye Neighbourhood Plan - Consultation by Statutory Bodies**

Dear Colleagues, following our earlier exchanges, I have been asked to underscore that we make a formal request for consultation on the Rye Neighbourhood Plan Strategic Environment Assessment scoping document. linked below. I am advised that it is a statutory requirement for us to seek views within 5 weeks on this document.

This document supports our emerging Neighbourhood Plan. Further background can be found on our website Rye Neighbourhood Plan

Anthony Kimber PhD
For RNPSG

Dear Dr. Kimber
Re: Rye Neighbourhood Plan SEA Scoping Report and Early Draft Consultation

Thank you for consulting Historic England on the SEA Scoping Report and early draft of the Rye Neighbourhood Plan. Historic England’s remit is for the Historic Environment including advising on the conservation of heritage assets and the promotion of good design in historic areas. As such, we have focused our comments on the Scoping Report and Neighbourhood Plan on those areas that fall within our interest.

SEA Scoping Report

Scattered throughout section 3.1 – 3.8 are numerous references to the history of Rye’s development and the influence of its geological setting, past trade and maritime associations and landscape character. These are all of relevance to consideration of Rye’s cultural heritage. In contrast the section of baseline evidence on ‘Cultural Heritage’ is rather disappointing and we would be concerned if the neighbourhood plan group took the view that the conservation area and its focus of listed buildings is all that form’s Rye’s heritage. At the least the Scoping Report should acknowledge that the plan area also contains important archaeological remains, including numerous scheduled monuments and is likely to contain a much larger number of sites of recorded archaeological remains (recorded on the Sussex Historic Environment Record (HER) held by the County Council), some of which may also be of national importance.

Indeed, the government’s definition of the historic environment (which may otherwise be thought of as cultural heritage) within the glossary to the NPPF, is very broad, including planted and managed flora as well as all evidence of the past interaction of people and place including surviving physical remains of past human activity, whether visible, buried or submerged. In addition, the lists of ‘designated heritage assets’ (listed buildings, conservation areas, scheduled monuments, registered parks and gardens, battlefields and protected wrecks) are all considered incomplete and should not be relied on as a comprehensive guide to the area’s valued heritage. As such there is potential for further heritage assets of national importance to be present within the plan area, as well as other remains of more local importance that, nevertheless, merit consideration in planning decisions.

The National Planning Policy Framework and the Planning Practice Guidance require that decision-making aims to sustain the significance of all heritage assets, including non-designated assets, such as the archaeological sites and historic buildings recorded on the County HER. It may also be necessary for the community to fill any gaps in recording where previously unidentified heritage assets may be present. It is not necessary for the Scoping Report to identify all the heritage assets within the plan area but it should identify the HER as a source of evidence that should be used in assessing the plan policies where relevant (particularly if sites are
to be considered for land use allocations or other projects are promoted through plan policies that could affect them). We recommend including the statement on the area’s archaeological potential from the plan itself in the scoping report, i.e. “Principle 8 - Respecting and Recording Archaeology. There are significant archaeological remains across the parish. With Rye’s long history as a port, trading and agricultural centre with the shifting nature of past river channels, beaches and marshes, there is high potential of the survival of evidence of past human activity of industrial, ship-building, fishing, and as a rural centre. Development will take account of this and any finds protected.” We recommend making specific reference to the Rye Extensive Urban Survey (a document setting out knowledge of the town's urban archaeological potential held as part of the HER at https://www.westsussex.gov.uk/media/1744/rye_eus_report_maps.pdf) as an important source of evidence in this respect.

Whilst it is not subject to an official ‘heritage designation’ Romney Marsh is a landscape that readily meets the definition of a heritage asset and we recommend this is also clearly identified as such in the scoping report along with the need for the plan (as it appears to endeavour to do) to sustain its significance.

In addition to identifying heritage assets the SEA should include some consideration of how these are presently valued – it may be helpful to consider whether they contribute to the economy of Rye (i.e. as the main attraction of the area for tourism, as well as a key feature of its attractiveness as a place to live and work), provide opportunities for social interaction or are important to the health of the population (the quality of the environment including a sense of place makes a major contribution to individual mental well-being). This helps to identify how impacts of decisions on heritage policy may have overlapping effects on other areas of plan making.

SEA should also help understand the ‘trajectory’ of any issues affecting the historic environment in order that the impact of decisions within the plan-making process on these as potential ‘cumulative’ impacts or enhancements can be judged. Issues may include the impact of traffic or past development on the perceived quality of historic areas or places, the loss of archaeological remains without appropriate recording or the deterioration of the fabric of historic buildings or structures either through lack of maintenance or natural processes (such as coastal erosion). Both development pressure and the effects of changing economic activity can also result in issues affecting the historic environment. The conservation area appraisal and extensive urban survey may provide some information on identified issues affecting the area, whilst the community may use their own knowledge of issues. Indeed the SEA provides a useful place to record the community’s impressions in order to ensure they are taking into account in decision-making.

Where this information is not available we recommend identifying it as an information gap that should be filled either through the completion of the environmental report or as part of the implementation and monitoring allowing informed review in time.
We are concerned that the sustainability framework does not include a clear and separate objective to promote the conservation and enjoyment of the historic environment, including conserving heritage assets in a manner appropriate to their significance. Given the richness of Rye’s historic environment we would consider this an important element of testing the appropriateness of the plan’s policies and proposals. Whilst this is in part covered by objective g., this is conflated with landscape consideration, which may relate to the natural environment and does not provide a clear test against this core area of planning. We would expect a more clearly focused objective for the historic environment to include measures such as the potential impact of policies on the town’s archaeological remains and buildings of local historic importance, and its historic maritime character as well as impacts on its listed buildings and conservation areas.

Draft Plan

With regard to the early consultation on the draft plan we have a small number of comments to make at this initial stage. Several of the policies appear to be aspirational rather than written as development control policies i.e. “I1: To support the establishment of community facilities in the West of Rye” and T3, although we assume this is because these are heading for policies that are yet to be completed. In particular we see Policy AI1 a) as a policy that could be given greater weight within the plan itself by phrasing it as a positive, encouraging development control policy – i.e. supporting proposals that seek to provide better facilities for visitors and contribute to the vitality of these facilities or other resources that help visitors and residents appreciate and enjoy the town’s heritage. Similarly, policy Al4 should not be an aspirational policy where these are designated heritage assets and development could be harnessed to conserve and enhance these structures. It may be helpful to give consideration to whether a distinct policy on supporting the town’s visitor economy including its infrastructure needs should be part of the business or infrastructure sections of the plan.

The sites adjacent to Rye’s river channels all have an unknown but potentially high potential for the presence of archaeological remains given the ancient origins of the town and its maritime history. The colonisation and reclamation of riverside land is recognised as a process that, in many cases, has taken many centuries, in some cases requiring considerable engineering and ‘ground making’ even in antiquity. This is likely to create waterlogged conditions suitable for the preservation of organic remains (such as timbers, leather and textiles) that have a high level of interest. As such, we recommend caution in the allocation of sites at Rock Channel, Winchelsea Road East and the land south of Udimore Road identified as Site S2 in Figure10. In each case we recommend that an allocation policy positively identifies the potential for the presence of previously unidentified archaeological remains and sets out a requirement for planning applications to develop these sites to be supported by the findings of a programme of archaeological investigation undertaken according to a
watching brief agreed in writing with the Council’s archaeological advisor. Each policy should also require that proposals will be designed to preserve any archaeological remains of national importance that are identified “in-situ”, whilst there should still be a presumption that remains of less importance will be retained where development does not provide benefits that don’t outweigh the potential benefits of their conservation and sensitive incorporation into new development and that cannot otherwise be provided. This approach provides a suitably robust policy ‘hook’ within the neighbourhood plan for the approach to the identification and protection of archaeological remains set out in the Rock Channel SPD.

There may be some potential for development of the sites at Rock Channel and Winchelsea Road East to have an impact on the setting of the Rye Conservation Area, as well as the numerous listed building and other heritage assets in the area. Where this is the case, it may be necessary for developers to provide a higher standard of design, or more locally specific response to ensure this avoids or reduces harm to the area’s character or appearance. Development control officers within the planning department will find it easier to insist on this as a requirement if the need to demonstrate that proposals have been designed to complement and sustain the key positive characteristics of the heritage assets is required in the allocation policy.

We hope these comments are of assistance in taking forward the plan and SEA and apologise if they appear rather negative. Unfortunately this consultation has come at a time of high volume of consultations and therefore they have been written in rather a hurry. If you would like further guidance on considering the historic environment in the neighbourhood plan we would be pleased to discuss this further and, given Rye particular value as a sensitive historic location, would be pleased to meet to discuss the plan further.

Yours faithfully

Robert Lloyd-Sweet
Historic Places Adviser (South East England)
Historic England
Guildford

Dr Anthony Kimber

Please find attached the ESCC response to the Rye NP SA Scoping Report.
As well as commenting on the SA Scoping Report (as below), the County Archaeologist has also provided some comments and advice relating to the draft Neighbourhood Plan document (Version 8).

Archaeology comments relating to the v8 Rye NP

It is suggested (see new additional text in red italics and deletions in strikethrough text) that the wording in the draft NP could be updated as follows:

**PAGE 79  Paragraph 42.24**

**Principle 8 - Respecting and Recording Archaeology.** There are significant archaeological remains across the parish. With Rye’s long history as a port, trading and agricultural centre with the shifting nature of past river channels, beaches and marshes, there is high potential of the survival of evidence of past human activity of industrial, ship-building, fishing, and as a rural centre. Development will take account of this and any finds protected potential through appropriate assessment, evaluation and mitigation in order that significant archaeological remains are protected in situ, enhanced and conserved or where this is not possible adequately recorded in advance of their loss. Provision will be made for all discoveries and findings to be reported to appropriate professional standards and the archive deposited with Rye Museum.

With regard to the historic buildings of Rye, reference should be made to Rye Rebuilt (2009) by David & Barbara Martin with Jane Clubb & Gillian Draper

The NP team should also make reference to the Rye Historic Character Assessment (2009) by Roland Harris. A copy can be downloaded from: https://www.westsussex.gov.uk/media/1744/rye_eus_report_maps.pdf

Chris Flavin
Senior Strategic Planner, Strategic Economic Infrastructure
Economic Development, Skills and Infrastructure Service
Communities, Economy and Transport
East Sussex County Council

EAST SUSSEX COUNTY COUNCIL ADVICE RELATING TO THE SUSTAINABILITY APPRAISAL SCOPING REPORT FOR RYE NEIGHBOURHOOD PLAN

Thank you for the opportunity to comment on the Sustainability Appraisal Scoping Report for Rye Neighbourhood Plan. The following are officer comments from East Sussex County Council (ESCC) which have been sub-divided into the respective disciplines for ease of reference.

1. Landscape
1.1 The scoping document is comprehensive in coverage of landscape, townscape and visual issues. They could usefully refer to National Character Assessment (Natural England) and The East Sussex County Council Landscape Assessment (2016) to inform their landscape assessment work.

1.2 Reference should also be made to the High Weald AONB Management Plan for those areas of the neighbourhood plan which are in or adjacent to the AONB boundary.

2. Air Quality

2.1 Regarding section 3.28, under ‘environmental baseline’:
1) Move the sentence about CO2 to the section above, about ‘accessibility and climate change’, as CO2 is not about air quality.
2) Explain what the air quality baseline is, as that’s the purpose of the section (ie. are the statutory health-based air quality objectives already being breached or close to being breached or not).

3. Ecology

3.1 The Scoping report addresses biodiversity issues well, although the following comments should be noted:
3.2 The Biodiversity section (para 3.10 – 3.15) should also make reference to Local Wildlife Sites (Sites of Nature Conservation Importance), ancient woodland, and Habitats and Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006. It should also be noted that Ramsar is not an acronym.
3.3 The need for improved connectivity applies to biodiversity as well as access.
3.4 SEA Objectives table (f): It may not always be appropriate to increase tree cover and woodland.

4 Historic Environment

4.1 The Environmental Report of the SEA and the draft Neighbourhood Plan would both benefit from more specific and detailed information about the historic environment of the plan area. At present only the Conservation Area and historic buildings appear to have been described but of course the historic environment of the plan area is much
more complex and interesting than this and spans all periods of human history over at least the last twelve thousand years. It comprises a great variety of heritage assets with archaeological, historic, architectural and artistic interest.

4.2 The County Archaeologist has said that he would be happy to discuss with the Rye NP steering group the key documents that could be used for the report of the SEA and the NP. Casper Johnson can be contacted directly on casper.johnson@eastsussex.gov.uk

4.3 If a professional archaeological/heritage consultant is employed then they should seek information directly from the county Historic Environment Record (HER) – the contact details for the HER are county.HER@eastsussex.gov.uk

4.4 Please note that the County Archaeologist has also had a look at the latest version of the draft Rye Neighbourhood Plan (Version 8) and has provided some comments – these will be provided separately.

208944 - Rye Neighbourhood Plan (NP) 2016 – 2028 and Strategic Environment Assessment (SEA)

Thank you for consulting Natural England on your Neighbourhood Plan and SEA.

NP – Appendix 5

Policy H8 – Lower School Site

Our records show that this site includes an area of Priority Habitat, as identified on Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006. The allocation site includes an area of deciduous woodland priority habitat and The National Planning Policy Framework states that ‘...if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.’ We, therefore, recommend that this designation be included under section 7 ‘Characteristics affecting development’ and that ‘yes’ be entered under section 6 in relation to ‘greenfield’, in the table relating to this site, included in Appendix 5.

Policy 4 – Rock Channel

Our records show that part of this site’s boundary (to the north-east) is adjacent to a site of national and international importance and designated as the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA), Ramsar and Site of Special Scientific Interest (SSSI). As there is potential for impact on this site (e.g. from water pollution), we recommend that the designations are included under section 7 of the relevant table.

Policy 5 – East of Winchelsea Road

Our records show that the allocation site includes an area of mudflats priority habitat and we, therefore, recommend that this designation be included under section 7 ‘Characteristics affecting
development’ and that ‘yes’ be entered under section 6 in relation to ‘greenfield’, in the table relating to this site, included in Appendix 5.

**SEA**

*Biodiversity (including flora and fauna)* - Paragraph 3.14

The **current designations** for sites within or close to Rye parish are as follows:

**National:**
- Rye Harbour Site of Special Interest
- Rye Harbour Nature Reserve.

**International:**
- Dungeness, Romney Marsh and Rye Bay Special Protection Area.
- Dungeness, Romney Marsh and Rye Bay Ramsar site.
- Dungeness Special Area of Conservation.
- Dungeness, Romney Marsh and Rye Bay Potential Marine Special Protection Area.

We also recommend that this document include **mapping of these sites** as part of its baseline information. The MAGIC website, which provides geographic information about the natural environment from across government in the form of an interactive map, includes the fully designated sites: [http://www.natureonthemap.naturalengland.org.uk/](http://www.natureonthemap.naturalengland.org.uk/)

Note: It would be useful to see the Appraisal Framework Tables (listed as Appendix E of the SEA) and the scoring of policies against SEA objectives (referred to in section 5.3 of the SEA).

**Rebecca Bishop MRTPI**
Adviser
**Sustainable Development**
**Sussex & Kent Team**
**Natural England**

**Anthony Kimber PhD**

**Dear Anthony**

Apologies for the late response, Thank you for consulting us on the SEA scoping assessment of Rye’s Neighbourhood Plan. We have no comment to make but would be pleased to be involved in the development of the draft neighbourhood plan itself.

Kind regards

**Sophie Page**
Planning Advisor
**Sustainable Places (Kent)**
**Kent & South London**
For Environment Agency
Appendix C – List of Other Plans and Programmes

<table>
<thead>
<tr>
<th>International</th>
<th>Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment</td>
</tr>
<tr>
<td></td>
<td>Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora</td>
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<td></td>
<td>Directive 2009/147/EC on the conservation of wild birds</td>
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<td></td>
<td>Air Quality Directive (2008/50/EC)</td>
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<tr>
<td>National</td>
<td>Localism Act 2011</td>
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<td></td>
<td>National Planning Policy Framework 2012</td>
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<td></td>
<td>National Planning Practice Guidance – live document frequently updated</td>
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<td></td>
<td>Housing White Paper February 2017</td>
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<tr>
<td>Regional</td>
<td>A Strategic Economic Plan for the Southeast the Local Enterprise Partnership 2016</td>
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<tr>
<td></td>
<td>Sussex Biodiversity Partnership – From Rio to Sussex Action for Biodiversity – a biodiversity action plan for Sussex 1998</td>
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<td></td>
<td>Sussex Biodiversity Opportunity Areas 2009</td>
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<td></td>
<td>Environment Agency Catchment Flood Management Plan</td>
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<tr>
<td></td>
<td>East Sussex Local Transport Plan 2011-26</td>
</tr>
<tr>
<td>Rother District</td>
<td>Rother Local Plan Core Strategy 2014</td>
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<tr>
<td></td>
<td>Development and Site Allocations Plan – Consultation Draft 2016</td>
</tr>
<tr>
<td></td>
<td>The Green Infrastructure Study is a background evidence study for the Rother Local Plan (2011-2028). Its purpose is to draw on relevant sources to identify spaces that contribute to green infrastructure in the district and to identify potential opportunities for future green infrastructure provision.</td>
</tr>
<tr>
<td></td>
<td>Landscape Assessments have been carried out for the Rother Local Plan for strategic development areas around Bexhill and the Hastings Fringes and for the Market Towns and Villages in order to assist consideration of the development strategy.</td>
</tr>
<tr>
<td></td>
<td>A Strategic Flood Risk Assessment has been prepared by Rother District Council, together with its consultants, Scott Wilson and in consultation with the Environment Agency.</td>
</tr>
<tr>
<td></td>
<td>Habitat Regulations Assessment (HRA) - The purpose of a HRA is to assess the impacts of a land-use plan, in combination with the effects of other plans and projects, against the conservation objectives of a European nature conservation site, also known as the Natura 2000 network; and to ascertain whether that plan would adversely affect the protection or integrity of such a site. This was carried out for the Rother Local Plan and includes the quantum of development in Rye.</td>
</tr>
<tr>
<td></td>
<td>A 'Low Carbon &amp; Renewable Potential Study' has been prepared for Rother District Council by Scott Wilson in association with Drivers Jonas and Thamesway Energy to help in the development of policies for a low-carbon future.</td>
</tr>
</tbody>
</table>
Appendix D: Checklist of SEA Scoping Report Requirements

<table>
<thead>
<tr>
<th>Strategic Environmental Assessment Requirements (Scoping Stage)</th>
<th>Where These Are Met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Objectives and Context</strong></td>
<td></td>
</tr>
<tr>
<td>The Neighbourhood Plan’s purpose and objectives are made clear.</td>
<td>Chapter 1 - Introduction</td>
</tr>
<tr>
<td>Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets.</td>
<td>Chapter 2 - Other Plans and Programmes Chapter 3 – Context and Baseline Information Chapter 4 - Environmental Issues</td>
</tr>
<tr>
<td>SEA objectives are clearly set out and linked to indicators and targets where appropriate.</td>
<td>Chapter 5 - Appraisal Framework</td>
</tr>
<tr>
<td>Links with other related plans, programmes and policies are identified and explained.</td>
<td>Chapter 2 - Other Plans and Programmes</td>
</tr>
<tr>
<td>Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.</td>
<td>Chapter 5 - Appraisal Framework</td>
</tr>
<tr>
<td><strong>Scoping</strong></td>
<td></td>
</tr>
<tr>
<td>The assessment focuses on significant issues.</td>
<td>Chapter 4 - Environmental Issues</td>
</tr>
<tr>
<td>Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</td>
<td>Chapter 4 - Environmental Issues</td>
</tr>
<tr>
<td>Reasons are given for eliminating issues from further consideration.</td>
<td>Chapter 4 - Environmental Issues</td>
</tr>
<tr>
<td><strong>Baseline information</strong></td>
<td></td>
</tr>
<tr>
<td>Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.</td>
<td>Chapter 3 – Context and Baseline Information</td>
</tr>
<tr>
<td>Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.</td>
<td>Chapter 3 – Context and Baseline Information</td>
</tr>
<tr>
<td>Difficulties such as deficiencies in information or methods are explained.</td>
<td>Chapter 3 – Context and Baseline Information</td>
</tr>
<tr>
<td><strong>Consultation</strong></td>
<td></td>
</tr>
<tr>
<td>Consultation Bodies are consulted in appropriate ways and at appropriate times on the proposed content and scope of the Environmental Report.</td>
<td>Chapter 1 - Introduction</td>
</tr>
</tbody>
</table>