

RYE CONSERVATION SOCIETY

Comments and Observations on the LDF Consultation Document - Core Strategy: Issues and Options

1. The **Rother in Profile** document seeks to identify the principal characteristics of the Rother Area. Section 3B on page 8 shows a chart identifying the AONBs in the District but it fails to identify the SSSIs and the areas proposed for SSSIs by English Nature. These SSSIs constitute a significant constraint upon future development and this should be recognised here and in the Core Strategy document.
2. The **Issues and Options** document treats the natural environment and the built environment as one single theme to be addressed jointly - **Theme 4 on page 6**. These are separate issues which require separate analysis and policy formulation. Linking them together means that both themes are underplayed in the discussion of Area Strategy Principles in Section 10. The latter contains no reference to historic towns and conservation areas.
3. Similarly, the need for measures to address environmental issues such as water and energy conservation and waste recycling are not adequately featured in the Strategy Principles, though their importance at the national level is acknowledged by citing **PPS 1 on page 19**.
4. In **Aim 1 of para 4.8 on page 8** the care of the countryside is not the same thing at all as the enhancement of the environment. More emphasis should be placed on policies designed to increase respect for and enjoyment of the countryside, free from visual clutter of all kinds.
5. The **Drivers for Change** section of the **Rother in Profile** gives insufficient weight to the growing public demand for localisation of services and government within the principle of subsidiarity, promoted by the European Union.
6. In **Section 4 Vision and Objectives**, the characteristics of the areas in **Rother in Profile** describe the cultural wealth present in the built historic environment and in the area's natural environment. These strengths of cultural heritage must find their full place in the LDF vision for 2026. **Aim 1** gives totally inadequate expression to this objective.
7. In response to **Question 4**, more affordable housing is required to meet the needs of first-time buyers in their local communities. However, inward migration should be directed towards large conurbations where employment is more readily available. The guidance in Draft PPS 3 should find specific expression in the **LDF** to the effect that new housing in villages and market towns should serve only to meet the requirements of the local community.
8. In response to **Question 5**, Sustainable progress requires guiding principles for future development.

These should be an integral part of planning, development, management and promotion. Tourism development should suit and reflect the unique or special character of the place in which it is sited; however no element of the environment should automatically be seen as static in its current state. Just as tourism should adapt to the environment in certain areas, so elsewhere it may be appropriate to adapt the environment to accommodate tourism.

The response in relation to out-commuting should be dictated by the principle of sustainability. Improvements to public transport services would permit increased 'out-commuting' to Hastings from Bexhill for example, though not many residents would regard such travel to work as 'out-commuting'.

9. In response to **Question 6**, poor transport links are major constraints upon growth, particularly the road network north and west of Hastings, and the infrequency of public transport services throughout the District. The LDF should seek to promote the upgrading of rail and bus services throughout the District.
10. In response to **Question 7**, the location of new housing principally in and around existing conurbations will provide the best opportunity and cost-effectiveness for managed neighbourhood schemes for provision of energy supplies (solar panels, roof-mounted heat-exchangers, local power generation, waste re-cycling etc.).

Aspects of the environment which contribute most to the quality of life are the use, maintenance and care of infrastructure and areas in the public domain. This sense of place engenders public respect for and identification with the built environment and is largely instrumental in combating vandalism. The core strategy should contain commitments to improving the architectural landscape of towns and villages in Rother District. Dumping of waste in the countryside should be more actively discouraged.

11. We consider it vitally important to the maintenance of the area's cultural and architectural heritage that new building design should achieve and emphasis a contextual relationship with existing historic buildings. This does not necessarily mean imitating in pastiche the historic idiom.
12. In response to **Question 8**, we support the stated aim of strengthening the role of Rother's town centres, and particularly in the case of Rye its High Street retail shops. We rate Rye's retail shopping facilities as adequate.

With regard to Recreational Facilities, the Town Salts are of the greatest importance to the setting of Rye and inappropriate development there in pursuit of 'improved recreational activity' has in fact diminished the quality of the area. The choice of ugly equipment for the children's play area; hard surfacing of grassed areas for the installation of an under-funded and under-used skate board park; intrusive flood-lighting on the football pitch - reducing the quality of life for untold numbers of residents.

The recently constructed sports hall - built to absolute minimum standards - includes little to attract users who expect far more and far nicer leisure provision. The new

swimming pool has been built to budget cost, without provision for example for solar panel heating, an obvious environmental requirement and an opportunity to save running costs.

Regarding Healthcare, we stress the importance of the retention of services at the Conquest Hospital.

13. In response to **Question 9**, we urge the continuing inclusion into the **LDF** from the **Local Plan** of all the broad principles listed in **para 4.1 (i - xiv)**, with the addition in **(vi)** of SSSIs and the specific inclusion of Best Practice Conservation Area Management Principles in the **LDF**.
14. In response to **Question 10**, we consider that there has to be a correlation between housing growth, infrastructure development and job creation. This argues strongly in favour of lower new house-building in the short to medium term. The already severe and mounting pressures on the built and the natural environment should be eased and not accelerated if possible.
15. **The table at para 12.15 on page 30 has rows B (growth-led) and C (reducing potential) inverted in error.** In response to **Question 11**, we consider that the scenario for reducing potential growth in new housing is preferable, more likely and more appropriate.
16. In response to **Question 12**, the inclusion of Rye in the so-called coastal belt may be geographically tidy, but the special constraints of landscape and heritage militate against any significant housing development in Rye, apart from new developments in the industrial zoning designated along Rye Harbour Road. Rye would be more appropriately included in the 'rural' area rather than the 'coastal belt'.
17. We support the findings (referred to in **para 13.17**) in the draft South East Plan that there is no scope for greenfield expansion to the east of Eastbourne/Hailsham and Bexhill. We urge that the **LDF** incorporates this conclusion.
18. In response to **Questions 13 - 15**, we would support the co-ordinated development at Bexhill and on the edge of Hastings (**Option 3 in para 13.35**) whilst preserving the recognised strategic gaps between the two settlements as far as possible.
19. Reference is made in **para 15.4** to work undertaken on the Local Plan Inquiry as supporting the need for further shopping floor-space in Rye. This finding and the procedure involved was criticised by the Inspector at the Inquiry for lack of public consultation, and we are interested to note the Residents' Questionnaire in this connection.
20. In response to **Questions 18 and 19**, the current objectives for Rye have been formulated and tested at the recent Public Inquiry and they will continue to remain valid throughout the time-scale of the new **LDF**. We urge that they be carried forward into the **LDF** and believe that **Option 2 - Consolidation** is the correct and

most appropriate model for Rye. We would not accept that the adoption of this model would pose any inhibition upon the development pressures for infill housing as suitable sites become available. We consider that Rye is capable of sustaining higher density building in smaller accommodation units and that this is best suited to the requirements of young families in the area looking for first homes.

We consider that Tourism is likely and properly to remain the principal economic activity of the Town and that the development of more light industry at Rye Harbour and increased working from home will provide the necessary concomitant drivers towards greater economic growth and prosperity. It is essential that Rye keeps and expands its range of specialist shops and this should be encouraged by all available means.

21. In response to **Questions 20 and 21**, we would support all the Strategy Directions proposed in **para 16.23** on **page 44** for the rural areas. We would accept for the future that **Option 2** could form the appropriate model if sensitively pursued.

KRF Bird
Hon. Secretary
Rye Conservation Society
27th November 2006