



Mill House
Beacon Lane
Northiam
East Sussex
TN31 6PJ

11 August 2020

Mrs Sarah Shepherd
Principal Planning Officer
Rother Planning Department
Rother District Council
Town Hall
Bexhill-on-Sea
East Sussex TN39 3JX

Dear Mrs Shepherd

**RR/2020/1044/P Churchfields Industrial Estate, Long Rake Spar Storage Land, Rye Harbour Road,
TN31 7TE**
**Variation of conditions 2, 6, 7 & 8 imposed on RR/2017/2541/P to alter the external materials, extend operating
times and alter landscaping details.**

I am writing on behalf of the Society to object to the above application as the Society is gravely concerned as to the effect of the proposals on the setting of Rye and of the proposed changes on the amenity of the important surrounding wildlife habitats and on the local traffic infrastructure.

We note that a large number of the comments on the website refer to the fact that the applicant is apparently not adhering to the working hours conditions stipulated in the original approval. We acknowledge that this is an enforcement matter which, until any amendment is granted to the conditions, should be rigorously enforced. However we are also very concerned that the traffic generation levels specified at the time of the original consent are adhered to, using Harbour Road and therefore the A259 junction.

Given that the site is adjacent to an area designated as a Site of Special Scientific Interest and a Special Protection Area, we believe that the additional noise and flood-lighting are contrary to the following Rother Policies:

Rother Core Strategy 2014	Policy EN1 Landscape Stewardship (ii)
	Policy EN5 Biodiversity and Green Space (ii,viii,ix)
Rother Development & Site Allocation Plan	Policy DEN4 Biodiversity
	Policy DEN7 Environmental Pollution (i,ii)

and that the application should therefore be refused.

In addition to the above we have concerns as to the effect of the additional working hours on Harbour Road and on the A259 junction. We note that additional material is to be delivered to the adjacent Wharf and thence to the site for processing. This must inevitably result in more finalised bagged material being made on site with the consequent need to deliver it to suppliers and therefore an increase in the truck trips to and from the site. However there is no mention or estimate of this additional vehicular movement in the application.

Honorary Secretary. Tim Gorman
Main email: ryeconservation@gmail.com
Planning matters: ryeconservationsociety@sky.com
www.ryeconservationsociety.org
Registered Charity No 283888

You will no doubt be aware of the concerns of Highways England as to the capacity of the A259 junction with respect to the number of planning applications on Harbour Road. Their recent email (24 June 2020) states that:

Accordingly, my view is that a junction upgrade is required to both mitigate the potential safety impacts as well as deal with the congestion on Harbour Road. I have concluded that the best way to achieve this is with the introduction of a mini roundabout similar to that which is already present at the A259 Kettle of Fish junction in Rye. I believe with appropriate over run islands and perhaps one solid island an appropriate safe and compliant design could be brought forward which if implemented would resolve Highways England's concerns. In this regard I am therefore suggesting that the applicants and their consultants work together to jointly bring forward a solution. If, in the event, joint working to mutual benefits is not achievable then regrettably some if not all of the above applications are likely to receive an unfavourable response from Highways England as we will be required to determine each on its own merits as well as its cumulative impacts on the highway network.

Given the above, the Society believes that it is essential that the full implication on the use of Harbour Road, arising from the additional working on site, is fully assessed before any consideration is given to determining the application.

Yours sincerely

Julian Lockett
Chairman, Planning Committee
Rye Conservation Society