

Comments by Rye Town Council on the Rother DC Development and Site Allocations Plan (DaSA) (Local Plan)

1. The 2014 Core Strategy recognised that it needed a **Development and Site Allocations Plan [DaSA Plan] (up to 2028)** to identify the sites required to meet its provisions and to elaborate certain policies. It would need to tackle two specific issues affecting dwellings: to consider adjusting existing development boundaries to reduce the constraints on meeting targets; to address the shortfall of deliverable sites against the 5-year target.

2. It is noted that the DaSA Plan records the preferred sites across Rother District in two categories:

- sites where no Neighbourhood Plan (NP) is being made
- sites identified in Neighbourhood Plans; Rye is in this category.

4. Rye Town Council has considered the DaSA Plan in its three parts.

- It has NOTED Part A – the Context: (the Core Strategy), with its development requirements (not for review), and related policies. Where NPs are being prepared these are listed (Rye is listed).
- It COMMENTS on Part B - Development Policies as below. Many of these draft policies affect the RNP. Some have argued that it would have been useful to have had these as Rye was drafting its RNP, but we are where we are. We have been specifically encouraged to consider the definitive housing requirements for the Rye Neighbourhood Plan area (Rye targets have already been reconciled by Rother officers) and the policies for Development Boundaries and “Gaps”.
- It has NOTED Part C – There are the Site Allocations for those parishes where no NP is being made. The only site allocations in this section relating to Rye are in Rye Harbour which we have considered in the RNP. Also there is discussion of traveller sites including one in Rye.

5. Whereas we had, at first sight, presumed that Part B might conflict with the emerging Rye NP, this is not the case. As agreed, here is the Rye TC comments in consolidated form on the three parts of DaSA.

The Rother District Development and Site Allocations Local Plan

DaSA Policy Number by Parts	RNP Policy	Subject	Comments on proposed policy
Part A		Neighbourhood Plans (NP)	Rye NP is listed as being drafted. Version 8 emerging plan is on the website. www.ryeneighbourhoodplan.org.uk Rother Officers have reconciled numbers in the RNP with the DaSA.
Part B Q1	None	Water Efficiency	Support approach: adopt standard through Bldg Regs
Part B Q2 – 4	E4	Renewable energy Communities Where Wind Turbines? Biomass? Energy Statement?	Suggest Rye Harbour for turbines and biomass Solar panels are not mentioned and could be fitted to large industrial and educational buildings in Rye. Support approach – should adopt national guidance standards.
Part B Q5	None	Retention of sites of social or economic value	Support approach and proposed criteria for retentions.
??	B3	Existing employment sites	Support approach
Part B Q6	None	Equestrian development	Support approach – as drafted
Part B Q7	H9	Affordable Housing	Support Option B, in line with PPG (None under 10; 30% over 10 dwellings)
Part B Q8	D1-D3	Access to housing and space standards (Older people)	Support Option E
Part B Q9 – 10	H11	Custom and self-build housing 1% of target of 160 houses= 2 for Rye	Rye could support 5 homes which is around 3% Support Option D; a site is identified in Rye NP

Part B Q11	D3	External residential areas	Support proposed policy
Part B Q12	D3	Extensions to residential gardens	Support proposed policy
Part B Q13	E1	Extensions and alterations, including annexes	Support proposed policy
Part B Q14	E1	Boundary treatments and accesses	Support proposed policy
Part B Q15	D2	Shopfronts and advertising	Strongly support proposed (more prescriptive) policy
??	None	Holiday Sites	Support proposed policy
Part B Q16	B3	Existing Businesses and Sites	Support proposed policy
Part B Q17	E2	Landscape and AONB	Support proposed policy
Part B Q18	E1	Strategic Gaps Rye-Rye Harbour to be extended	Support the proposed definition of strategic gap, but given the unique nature and profile of Rye could be extended to gaps on the Eastern and Western approaches: New Road, Military Road and New Winchelsea Rd
Part B Q19	E2-E3	Bio diversity and Green Space	Support the policy approach
Part B Q20	F1	Drainage	Support the policy approach
Part B Q21	None	Land Stability	There is a risk of (sandstone) rockfall around Rye. The rock structure is of similar composition to cliff structure of Fairlight / Pett . The risk locations include East, South and West Citadel; land above Military Rd and at Cadborough. Rye should be specifically identified and a similar policy applied to land at risk above and below where historical falls have occurred. Propose inclusion of Rye as for Fairlight and Pett Level

Part B Q22	E3	Environmental Pollution	Support policy approach
Part B Q23	H12	Comprehensive Development	Support policy approach
Part B Q24	E1	Development Boundaries	The RNP proposes two changes to the development boundary of Rye. Policy approach should cater for this.
Part C Targets		Rye (and Rye Harbour) Overall Targets: 355-400 dwellings (40 in Rye Harbour) 10-20,000 sqm employment	Dwellings Number Breakdown has been agreed with Rother DC Officers: Total Completions Large Site Small Site Windfall 355 198 22 6 22 Balance: 107
Part C Rye Harbour		Allocation to Rye Harbour 40 dwellings	Support policy approach; as directed by Rother DC, and for historical reasons, the RNP has text covering the target of 40 dwellings in Rye Harbour (Icklesham Parish) The 40 are included in the Rye target of 400 as above.
Part C Traveller sites		Traveller Site Rye Gritting Depot is listed but not a preferred option	Support policy approach