

A Report by Rye Town Council on the consistency of the Rye Neighbourhood Plan (RNP) with the Rother DC Development and Site Allocations (DaSA) (Submission Copy)

1. The 2014 Core Strategy recognised that there was a need for 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.

2. The publication of the DaSA coincides with the RNP Plan Submission to meet Regulations 15 and 16 of the Neighbourhood Planning Act. Therefore this is a consideration of the RNP in relation to the emerging DaSA. Rye notes two specific development issues, tackled by the DaSA:

- a. 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.
- b. to identify development across Rother District in two categories:
 - i. preferred sites where no Neighbourhood Plan (NP) is being made
 - ii. Neighbourhood Plans, that identify sites to meet targets; Rye is in this category.

3. Throughout 2018, Rye Town Council has kept abreast of the drafting of the emerging DaSA through its work on the RNP. At this stage Rye has reconsidered the three parts of the DaSA Plan to ensure that the RNP remains consistent.

- The Context (Introduction – Section 1): Where Neighbourhood Plans (NPs) are being prepared these are listed (Rye is listed). We understand the need for the Rye NP to conform to the Core Strategy, the NPPF (initially 2012 now superseded by NPPF 2018) and be consistent with the emerging DaSA. All of which it does, as covered in the Rye NP Basic Conditions Statement. Rye notes the targets as below, which the RNP meets.
 - Business: 10,000-20,000sqm at Rye/Harbour Road
 - Dwellings: 355-400 at Rye over the planning period. The Rye NP includes figures to show commitments and the residual balance.
- Part A: Rye COMMENTS on the Development Policies in the emerging DaSA as below. Some additional work in 2018 has been necessary to ensure that the Rye NP is consistent with the emerging DaSA, and did not unnecessarily duplicate its policies, unless the community wanted to make particular emphasis. The emerging DaSA housing

requirements for the Rye NP area have been periodically reconciled with Rother targets. It should be underscored that we agreed with Rother planning officers in May 2017 that the Rye NP should “overplan” numbers of dwellings as there remains uncertainty about the deliverability of some allocations to sites. We also included the policies for Development Boundaries and the Rye “Strategic Gap”.

- Part B – Rye NOTES the Site Allocations for those parishes where no NP is being made. Because historically Rye was considered with Rye Harbour for development targets, the Rye Harbour allocation (for 40 dwellings) and the business allocation in the Harbour Road is of interest to Rye and has been considered in the text of the RNP, but not allocated, as instructed by Rother Planners. It is also noted that there are now no traveller sites allocated in Rye.

4. Here is a summary of the comparison of the DaSA with the RNP.

The Rother District Development and Site Allocations Local Plan

DaSA Policy Number	How the RNP relates to the DaSA	DaSA policy	Comments
DRM 1	None	Resources: Water Efficiency	Agree: provides policy; adopts standard through Bldg Regs
DRM 2	E4 Para 4.88	Resources: Renewable energy	Agree: complements RNP E4. We have suggested that Rye Harbour has potential for turbines and biomass. Solar panels and such installations could be fitted to large industrial and educational buildings in Rye.
DRM 3	E4	Energy Requirements	Agree; complements RNP E4
DCO 1	B1 and I1	Community: Retention of sites of social or economic value	Agree; complements RNP E4
DCO2	None	Community: Equestrian development	Agree; complements RNP E4
DHG 1	Para 4.8	Housing: Affordable Housing	Agree: confirms the policy for Rye: 30% in developments over 10 dwellings
DNG 2	N/A	Housing: Rural Exception Sites	Not considered

DHG 3	D1	Housing: Internal space standards	Agree: national guidelines; complements RNP D1
DHG 4	D1	Housing: Accessible Homes	Agree; complements RNP D1
DHG 5	H2	Housing: Homes for older people	Agree: complements RNP H2
DHG 6	H3 and H7	Housing: Custom and self-build housing	Agree: complements RNP H3 and H7 The RNP allocates in two Rye sites to a figure of around 5 homes which is around 3% of target.
DHG 7	D1	Housing: External residential areas	Agree; complements RNP D1
DHG 8	D1	Housing: Extensions to residential gardens	Agree ; complements RNP D1
DHG 9	D1	Housing: Extensions and alterations	Agree: complements RNP D1 Extensions should be examined on an individual basis but have sense of place and must not cause over development, loss of amenity or excessive density
DHG 10	D1	Annexes	Agree; complements RNP D1 Annexes should be examined on an individual basis but have sense of place and must not cause over development, loss of amenity or excessive density
DHG 11	D1	Housing: Boundary treatments	Agree; complements RNP D1
DHG 12	D1	Drive Access	Agree; complements RNP D1
DEC 1	D1 and E3	Economy: Shopfronts and advertising	Agree: complements RNP Complements RNP D1 and E3
DEC 2	None	Economy: Holiday Sites	Agree but not directly applicable
DEC 3	B1	Economy: Existing employment sites	Agree; complements RNP B1
DEN 1	D1 and E2	Environment: Landscape	Agree: strongly support Complements RNP D1 and E2

DEN 2	Para 4.72, 4.88	AONB	Agree: support; provides policy. Has formed part of the Rye objection to the BP proposal off the Udimore Road which is adjacent to the AONB								
DEN 3	E1 and para 4.72 to 4.76	Environment: Strategic Gaps Rye-Rye Harbour	Agree: strongly support map (DaSA Figure 8) and policy, that complements RNP E1								
DEN 4	E2- E3 Paras 4.77 to 4.80	Environment: Bio diversity and Green Space	Agree; complements RNP E2 and E3								
DEN 5	F1 and para 4.32	Environment: Sustainable Drainage	Agree ; complements RNP F1								
DEN 6	Para 4.89	Environment: Land Stability	Agree; provides policy We have raised the risk of (sandstone) rockfall around Rye. DaSA now lists Rye's risk locations include East, South and West Citadel; land above Military Rd and at Cadborough.								
DEN 7	None	Environment: Pollution	Agree: provides policy. Vehicle pollution is a particular issue for those adjacent to the A259								
DIM 1	Individual site policies	Implementation: Comprehensive Development	Agree; support as this complements policy for several of our allocated sites								
DIM 2	E1	Implementation: Development Boundaries	Agree; complements RNP E1. RNP proposes two changes to the development boundary of Rye, otherwise the development boundary should remain								
Rye Targets	H1 H2	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: <table border="1"> <thead> <tr> <th>Total</th> <th>Completions</th> <th>Large Site</th> <th>Small Site</th> </tr> </thead> <tbody> <tr> <td>355</td> <td>227</td> <td>6</td> <td>25</td> </tr> </tbody> </table> Windfall: 16 Balance: 81	Total	Completions	Large Site	Small Site	355	227	6	25
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Rye Harbour Target	Para 4.2	Targets: Allocation to Rye Harbour 40 dwellings	Agree: as directed by Rother DC; 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 but site allocation if left to Rother/Icklesham.								
Other Policies	None	Traveller Sites	No sites								