

Rother District Council Regulation 18 Draft Local Plan 2020-2040 Consultation

TWBC RESPONSE TO CONSULTATION QUESTIONS

[Draft Local Plan 2020-2040 – Rother District Council](#)

Tunbridge Wells Borough Council (TWBC) welcomes the opportunity to engage with Rother District Council (RDC) as part of the Regulation 18 Draft Local Plan Consultation, which runs until 23 July 2024. TWBC has considered the consultation documents and wishes to make the following comments in response (where a question is not included in the table, this should be taken to mean that TWBC does not wish to comment on this particular question/policy area at this time).

Chapter	Policy/Theme	Question	TWBC comment
Vision, Overall Priorities and Objectives	Vision	Q1. What are your views on the Council's Vision?	TWBC agrees with the thrust of RDC's Vision in striving to achieve sustainable development, net carbon reduction and enhancing the quality of life of local residents in how they live, work and travel.
	Overall Priorities	Q2. What are your views on proposed twin Overall Priorities to be 'Green to the Core' and 'Live Well Locally'?	TWBC considers that both of these priorities will help to positively achieve the Vision above.
	Key issues	Q3. What are your views on the key issues (listed at paragraph 2.13) that have been identified and is there anything significant missing?	TWBC generally agrees with the key planning issues identified but notes there is no mention of flood risk or the historic environment/heritage assets, although it is recognised that the latter is reflected in Objective 3. There should be a greater emphasis on the importance of providing

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			appropriate levels of infrastructure to meet the housing need.
	Objectives	Q4. What are your views on the Council's objectives for the local Plan?	TWBC strongly agrees with the Objectives for the Local Plan which all include the underlying thread of sustainability in line with the requirements of the NPPF.
Green to the Core	Proposed Policy GTC7: Local Nature Recovery Areas	Q20. What are your views on the Council's proposed policy for Local Nature Recovery Areas?	TWBC supports the policy approach to Local Nature Recovery Strategies
	Proposed Policy GTC8: Biodiversity Net Gain	Q22. What are your views on the Council's proposed policy for Biodiversity Net Gain?	TWBC support the approach taken by RDC towards mandatory Biodiversity Net Gain and qualifying applications but would encourage RDC to seek gains for biodiversity from all appropriate development through schemes of mitigation and enhancement proportionate to the development
		Q23. What are your views on the Council going above the national minimum requirement of 10%?	TWBC applaud the ambitious target of 20%, being above the statutory requirement for BNG. However, it is noted that the evidence base to justify going above the 10% mandatory requirement is being collated by the district, in collaboration with the Sussex Nature Partnership and neighbouring local planning authorities and therefore could be subject to change in the next iteration of the Local Plan.

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	Proposed Policy GTC9: High Weald National Landscape (AONB)	Q25. What are your views on the Council's proposed policy for the High Weald National Landscape?	<p>TWBC supports the general policy approach that RDC have proposed in relation to the High Weald National Landscape, recognising that it should be conserved and enhanced.</p> <p>TWBC notes RDC's approach that small scale development may be appropriate within the High Weald National Landscape and that major development should only take place in exceptional circumstances in line with national policy. It would be helpful if RDC would set out its approach to determining what it considered to be major development.</p>
Development Strategy and Principles	Preferred Spatial Development Options	Q51. What are your views on the Council's preferred spatial development options?	<p>TWBC agrees with the identification of options focussing on brownfield intensification and redevelopment and those settlements where services and facilities can be accessed by sustainable transport options.</p> <p>However, TWBC strongly encourages RDC to seek to meet the identified development needs in full. RDC should investigate all potential opportunities to increase housing provision within its plan area. RDC should ensure no stone is left unturned in maximising the potential of the existing urban areas to regenerate and be intensified, where appropriate to</p>

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			<p>do so. RDC should investigate how smaller settlements might accommodate new developments to meet local housing needs, with the aim of meeting the District's Housing need in full. Any shortfall/unmet need should be robustly justified and backed up by appropriate evidence. TWBC would like to know whether RDC has considered a growth strategy that includes a new settlement/other significant urban extension as a way of seeking to meet its need in full and where it/they might be located.</p>
	<p>Proposed Strategy: Overall Spatial Development Strategy</p>	<p>Q.54 What are your views on the Council's proposed spatial development strategy and proposed minimum targets for housing and employment growth?</p>	<p>See response to Q51. TWBC notes the proposed minimum targets but that these are subject to change as a result of additional sites coming forward through the rolling Call for Sites and as further site assessment work is undertaken.</p> <p>TWBC considers that the final targets and identification of specific site allocations should be supported by appropriate technical evidence and appropriate supporting infrastructure. Importantly, in the case of TWBC, cross boundary impacts should be considered and appropriately mitigated, with relevant cross-boundary engagement with</p>

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			infrastructure providers, Kent County Council, National Highways etc.
		Q.55 Are there any alternatives or additional points the Council should be considering?	As indicated above, TWBC believes RDC should be looking to meet their housing needs in full.
	<p data-bbox="477 499 801 571">Delivering the Spatial Development Strategy</p> <p data-bbox="477 611 748 683">Vision for Northern Rother</p>	Q.68 What are your views on the vision for Northern Rother?	<p data-bbox="1442 499 2033 786">See also response to Q51. TWBC considers that in order to achieve the proposed vision and deliver the potential number of new dwellings and employment floorspace over the plan period, the Plan will require the completion of the following evidence base studies:</p> <ul data-bbox="1442 802 2033 1058" style="list-style-type: none"> <li data-bbox="1442 802 1944 866">• Appropriate Landscape Impact Assessment(s)/Setting Study <li data-bbox="1442 874 2033 1018">• Transport Modelling – both for the strategic and local road networks and a full assessment of the impacts on Flimwell Junction. <li data-bbox="1442 1026 1989 1058">• Flood risk modelling/assessments <p data-bbox="1442 1098 2033 1386">The draft Rother Local Plan also recognises that the residents within the Northern Rother sub-area are likely to use services and facilities outside of the sub-area, including in Tunbridge Wells Borough. TWBC would expect, therefore, that the infrastructure requirements to support the potential</p>

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			<p>level of growth are fully investigated through engagement with the relevant infrastructure and other service providers (as well as both East Sussex County Council and Kent County Council) and for this to be clearly evidenced in the Infrastructure Delivery Plan and, as appropriate, in Statements of Common Ground. Appropriate mitigation should be provided for any potential cross boundary impacts on Tunbridge Wells Borough following consideration and discussion through Duty to Cooperate meetings.</p> <p>TWBC would welcome further discussion with RDC on the proposals for the Northern Rother sub-area and the potential impact of this on Tunbridge Wells Borough as the RLP is progressed.</p> <p>TWBC would also welcome discussion on the identified A21 growth corridor and further details of what the aspirations are for this area over the longer term. This should include ongoing engagement with Kent Council Council Highways in particular, and with National Highways.</p>
		Q.69 What are your views on the distribution and opportunities for growth	See response to Q68.

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		in settlements within the sub-area in figures 29, 30 and 31?	
		Q.70 What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Northern Rother?	<p>See response to Q68.</p> <p>TWBC notes the sites identified in the HELAA at Flimwell and Robertsbridge as potential development sites. The exceptional circumstances for allocating sites within the High Weald National Landscape should be clearly demonstrated and justified. TWBC would also expect that the cumulative impact of the potential development sites, including any in combination impacts with sites already identified, are fully considered. As referenced in Q68, this should include a full assessment of the impacts on Flimwell Junction.</p>
		Q.71 What are your views on a potential 30-year vision for the A21 transport corridor?	<p>See response to Q68.</p> <p>There is very little detail provided within this draft Local Plan as to what the 30-year vision is and so further detail is required before constructive comment can be made.</p>
	Proposed Strategy: Sites for Gypsies, Travellers and Travelling Showpeople	Q74. What are your views on the proposed policy for Sites for Gypsies, Travellers and Travelling Showpeople?	Relevant officer still reviewing the policy approach but broadly note that the policy is based on PPTS compliant definition (as defined in December 2023) and

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			seeks to meet need of 23 additional pitches through allocations within the Local Plan which is supported.
		Q75. Are there any alternatives or additional points the Council should be considering?	<p>As reiterated in previous response – the Council would be keen to understand what the aspirations are for the A21 growth corridor.</p> <p>It would also be useful to better understand the constraints around the limitation of growth at Bexhill and whether these can be overcome during or beyond the current plan period.</p>
Infrastructure	Policy INF1: Strategic Infrastructure Requirements	Q109. What are your views on the Council's proposed policy on strategic infrastructure requirements?	TWBC agrees with the general thrust and approach proposed within the policy in terms of the timing and implementation of relevant infrastructure (delivery upfront or to an agreed timetable). The approach to ensure the safeguarding of existing infrastructure is also welcomed.
		Q110. Are there any alternatives or additional points the Council should be considering?	It should also be recognised in this policy, that some locally accessible infrastructure may lie outside of Rother District and, therefore, the need for cross boundary discussions and possible financial contributions is paramount.
		Q111. Specifically, what are your views on requiring the submission of appropriate evidence to demonstrate that	TWBC considers there will need to be sufficient engagement with relevant infrastructure and utility providers –

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		there is, or will be, sufficient infrastructure capacity to meet the demands of a new development?	transport, water/sewage, education, medical services etc. through Duty to Cooperate and producing Statements of Common Ground along with the requirement to produce evidence base documents – such as transport modelling and flood modelling to support the Infrastructure Development Plan and the Local Plan.
Sustainability Appraisal			<p>It would be helpful to understand more on the reasons why the sustainable transport corridor aspect of most sustainable development strategy option (SDO3B) was disregarded in its entirety when its less sustainable counterpart (SDO3A) is included as part of the development strategy.</p> <p>Para 5.2.3 states the sustainable transport corridor is not considered deliverable within the plan period. However, if Bexhill is going to be subject to growth through the Local Plan, the sustainable transport corridor could be a longer-term ambition. The SA should clarify whether the development around Bexhill will work towards or set the framework for the sustainable transport</p>

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			corridor coming forward in the future, or at least not hinder its potential.
Habitats Regulations			No comment.
Duty to Cooperate Statement			<p>TWBC notes the reference in the Engagement and Duty to Cooperate Statement, to key cross boundary issues and ongoing engagement between TWBC and RDC during the preparation of their emerging Local Plans and as members of the Ashdown Forest SAC Working Group. This should also include neighbouring County Councils including Kent County Council.</p> <p>TWBC also notes reference at paragraph 6.35 to the existing Statement of Common Ground between both authorities and will accordingly work with RDC on any required updates to this going forward particularly in regard to the issue of unmet housing need, and cross boundary infrastructure provision.</p>