



Network Rail
1 Puddle Dock
London
EC4V 3DS
E craig.hatton@networkrail.co.uk

Via email:

22 July 2024

Dear Sir/Madam

NETWORK RAIL RESPONSE TO ROTHER LOCAL PLAN (REGULATION 18)

Thank you for providing Network Rail the opportunity to make comment on the Regulation 18 version of the Rother Local Plan.

It is important that opportunities to promote the use of the railway as a more sustainable modes of transport are identified and taken forward. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and regulated by the Office of Rail and Road (ORR), to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. As a matter of course, proponents of sites which are close to the railway boundary or sites which could affect the railway asset directly are required to engage with our Asset Protection and Optimisation team (ASPRO).

Network Rail has comments which we hope are of use to the Council and are keen to assist where possible to deliver these.

Network Rail commend the work done by the Council to highlight opportunities to base new development around proximity to transport hubs as this is also a key focus for Network Rail. We would agree that the vision for Rother is ambitious but is achievable and Network Rail will work with the Council to deliver this.

Overall Priority 1

Network Rail supports the objective of being 'Green to the Core' and basing planning decisions around the climate emergency. The focus on promoting sustainable transport around which development would happen is supported.

Network Rail believe that access to rail stations should be prioritised to get users to the rail network as quickly and efficiently as possible. The mass transit of people via the railway network is one of the easiest ways of reducing car journeys and focusing new development near rail stations will enhance this opportunity.

Overall Priority 2

Network Rail supports the approach of 'Live Well Locally' given its focus on promoting sustainable transport and the decarbonisation of journeys within the District.

Opportunities to maximise developments close to rail stations should be pursued. Network Rail support first and last mile principles which focus on getting people to rail stations quickly. Encouraging fully connected and easily accessible walking, wheeling and cycling routes to stations from new developments should be priorities within the new Plan. Ensuring sufficient cycling facilities at stations to support this should also be a key part of the Plan and Network Rail are keen to work with the Council to establish this.

The key principles as set out at para 2.13 are supported and cover the most pertinent points. Network Rail would suggest the addition of reference to planning for improved transport infrastructure to support a transition to decarbonising travel within the District. This would also include seeking improvements to existing rail stations both in terms of facilities such as cycle storage and general accessibility to make it easier and more attractive for people to use the rail network.

Proposed Policy LWL1: Compact Development

Network Rail support the objective of this draft Policy and the promotion of higher densities around public transport. In terms of aligning with the rail network, Bexhill, Battle and Rye provide the most efficient and accessible services. Therefore, the identification of these as the three main urban areas is supported. Where development is located close to rail stations, opportunities should be pursued to secure improved accessibility to the stations. This could include walking routes, new and improved station entrances and step free access improvements to access station platforms.

Proposed Policy LWL3: Walking, Wheeling, Cycling & Public Transport (outside the site)

Network Rail is supportive of the Council's approach to this Policy. Its ambition to focus development on access to public transport is applauded and aligns with Network Rail's approach to encouraging use of the railway. Battle rail station has recently been awarded funding to begin the process of developing a scheme to provide Access for All. This includes the provision of footbridge and lifts to ensure step free access for all those wishing to use the railway. Network Rail would suggest that the Council seeks to take advantage of the opportunity provided by Access for All at Battle station, to encourage increased use of the station.

Network Rail are keen to work with the Council to identify other opportunities to better connect new development with rail stations and, where required, pursue step free access improvements at these stations. This will play a key role in encouraging the use of the rail network and reduce car journeys. Network Rail would encourage the Policy, and the Plan

as a whole, to promote higher density development close to rail stations to maximise opportunities to increase rail patronage.

Network Rail notes the inclusion of the 400m threshold for accessing public transport. In the context of rail stations, research has shown that people are prepared to walk further (1 – 1.2km) to access a rail station where there are fast connections. In these cases, people will also often walk the further distance faster. A blanket 400m approach for rail stations is clearly unachievable however a rapid bus service that can cover a significant distance to the rail station, or providing pleasant and safe walking routes for those undertaking a longer distance should be supported. Longer routes that lack footway or present other dangers are likely to be less attractive for people to use.

Ensuring that development contributes to cycling facilities, such as secure cycle storage at rail stations and cycle only routes, will demonstrate the confidence for people to access public transport this way.

Proposed Policy LWL4: Walking, Wheeling, Cycling & Public Transport (inside the site)

Network Rail supports the Council's approach to securing improved active travel connections within development sites. Providing quick and efficient links to public transport hub, especially rail stations, is a significant means of boosting both use of public transport and reducing car journeys. Network Rail would suggest that reference be made to connecting with public transport as part of the draft Policy. It is noted that para 4.32 includes wording for this however, to add greater weight, inclusion within the Policy should be considered.

Proposed Policy DEV2: Comprehensive Development and Masterplanning

Network Rail supports the requirement for a masterplan to demonstrate meeting the requirements of the Local Plan including in relation to sustainable transport. A clear setting out of phasing would also be required to inform how any infrastructure needs are to be met.

Preferred Spatial Development Options

Network Rail supports the approach for a combination of the options presented to take forward an inform the Plan. These fit within the criteria of Green to the Core and Live Well Locally and seek to maximise opportunities close to public transport, which Network Rail advocates for. It is important to note that where development is close to, or actively encourages use of, the rail network that access to and usage of rail stations are considered as part of the Transport Assessment(s).

Where improvements are needed, Network Rail requests that the Council supports planning obligations for securing funding towards these from development where an increase in use is demonstrated. Bexhill could be an especially vulnerable station in terms of increased use and reviewing the needs of the station on a regular basis is appropriate. Network Rail is keen to work with the Council on this to ensure that users can access the rail network quickly and efficiently.

Given the proposed improvements to step free access at Battle rail station, where possible opportunities to develop close to the station should be sought to maximise the benefits of these improvements.

Overall Spatial Development Strategy

Network Rail notes the focus on Bexhill as the most sustainable town and the comments regarding improvements at Bexhill as outlined above are also relevant here. Any policy approach towards Bexhill should consider the rail station as a central part of the growth strategy, both as a means of facilitating sustainable transport and centring the station as key part of the local economy and public realm.

In anticipation of a review of the NPPF, Rother should ensure that planning for the district's housing requirement is a central part of the Plan. The current NPPF requires that 'no stone is left unturned' when identifying sites to meet housing needs. Using the rail network as a basis for developing a growth strategy is sound and should be maximised where possible.

Vision for Bexhill

Network Rail notes and supports the vision for Bexhill. Reference should be made to ensuring that Bexhill rail station capacity is upgraded to meet demand, if required and that opportunities to secure station improvements be sought as part of the vision.

Network Rail has reviewed the potential development sites within the HELAA. Land availability is limited in Bexhill, especially in the central part of the town, therefore maximising density should be paramount. As part of this, the Council should review the development quantum for each potential site to ensure these are maximised given the sustainable nature of Bexhill.

Vision for Battle

Network Rail note the proposed development strategy for Battle and acknowledge the issues around sensitivities of the landscape and other constraints towards the north of the District. In terms of the railway, as previously noted Battle has funding towards the implementation of the early stages of an Access for All scheme to bring step free access to the station for passengers.

Capturing new development around Battle will ensure these facilities are utilised however it's also likely that passengers may travel from other parts of the District to use the step free access. Therefore, a strategy to get users to and from the station regularly should be developed with East Sussex CC to maximise the opportunity at Battle. Where possible, Network Rail would advocate for development to be maximised near to Battle station albeit considering the relevant constraints.

As part of this, development ear to the station should also contribute towards improving accessibility to the station either through improved pedestrian and cycle links or through financial contributions towards a regular bus service or improvements at the station itself.

Vision for Rye

As another urban area supported by a mainline station, there are opportunities to maximise development potential in Rye. Insofar as direct relationships to the railway exist, there are two level crossings near to Rye station which could present a risk to safety with development coming forward. Where possible, Network Rail would seek to mitigate the risk either by increasing safety provisions or closing the crossings. This is particularly pressing with the level crossing located close to Ferry Road. Draft site allocations close to this crossing will increase the use of the crossing meaning further risk to safety due to cumulative impacts of development.

Network Rail would like to work with the Council so that these allocations include any contributions towards mitigating the level crossing risk. This would especially be the case for sites RYE0002, 0003, 0006 and 0015 as identified within the HELAA. Any of the currently rejected sites close to the crossing in the HELAA that may become draft allocations should also be considered within this context. As the ultimate arbiter and experts in railway safety, Network Rail can advise the Council on the most appropriate course of action and strategic approach to the level crossing issues.

Vision for Northern Rother

Network Rail support the proposal to use the two rail stations as transport hubs around which development can be brought forward. An approach which prioritises pedestrian and cycling access to the stations should be maximised as should the quantum and density of development of the sites.

Network Rail note the number of rejected sites in the HELAA around the Etchingham station. The Council should review these if insufficient sites can be found elsewhere as they are located in a highly sustainable location. Where sites are close to the station, Network Rail can assist the Council in identifying if there are any impacts on the station itself and how it functions. It is noted that the views from the station, especially northwards, are highly sensitive.

Similarly, there are some possible sites close to Robertsbridge station. Network Rail understand the reasoning for rejecting SAL00034 however it is located in a sustainable location albeit within a sensitive context. SAL 00015 could contribute towards improving access to the station and providing a better linkage through to the village centre.

The longer term vision involving the A21 bypasses does present the opportunity to unlock additional land for development however it should be reviewed robustly to ensure that introducing new roads is justified in the current environmental climate. From a railway perspective, this could increase the accessibility of stations in northern Rother however it is unlikely to facilitate a modal shift away from the car to public transport.

Sites for Gypsies, Travellers and Travelling Showpeople

Network Rail note the proposed Policy approach in relation to GTTS. Should any proposed sites be close to the railway, Network Rail would like to work with the Council to mitigate the impacts of rail movements close to the sites.

Housing trajectory – stepped delivery

Network Rail has concerns over leaving a significant proportion of delivery until later in the plan period. This potentially risks the Plan not meeting requirements through sites not being built out. Additionally, lengthy delays in delivery can impact on infrastructure funding and mean that improvements may not be secured.

Proposed Policy HWB6 – Public Rights of Way

Network Rail support the retention of PRow where possible however in situations where development leads to increased use of a PRow that crossing the railway at-grade, then safety risks have to be considered. Network Rail do not support new PRow which interact with the railway either through at-grade crossings or which could lead to trespass on the railway.

Reference to considering the impacts of PRow on railway safety in the context of new development should be included within the draft Policy. Network Rail can advise the Council on appropriate safety mitigation required and the circumstances around this. Additional analysis can also be provided to help inform the Council in relation to level crossing safety and its impacts.

Proposed Policy INF1: Strategic Infrastructure Requirements

As a provider of infrastructure, Network Rail supports the intention of the draft Policy. In regard to timing and phasing of delivery, Network Rail would encourage the use of Grampian conditions to ensure funding for the required infrastructure is provided to mitigate the impact of development.

Network Rail support the need for early engagement over funding and delivery of required infrastructure. It should be for the developer to demonstrate that certain infrastructure improvements are not required as part of a planning application and to provide evidence for this. Network Rail review infrastructure needs regularly to identify any gaps and funding shortfalls, and this can be communicated to the Council and developers through an annual update of the Infrastructure Delivery Plan. Network Rail supports a robust infrastructure policy that requires developers to fund improvements needed for development and to do so early to ensure delivery. Securing funding through relevant planning obligations and the Community Infrastructure Levy is supported.

Rail network in Rother

Rother district is relatively well connected with East to West and North to South rail links however the services can be slower and would benefit from improvements. The potential however is significant, and Network Rail are reviewing opportunities to further enhance the rail network.

The Bexhill to Rye rail link provides access to Eastbourne and Ashford International as the main destinations with this route being operated by Southern Railway. The northern route connects Battle with north Kent and south London stations with a terminus at Charing Cross.

Step free access at Battle rail station is being pursued through the Access for All programme, with initial funding secured to carry out feasibility of a scheme. Additional funding may be required to further the scheme and developer contributions provide a justified source to assist in this.

Similarly, step free access improvements at Bexhill station could be made and there are on-going discussions around a new entrance at the station. Network Rail would encourage the Council to also support an approach towards securing developer contributions to improving Bexhill station to allow it to accommodate the anticipated growth around Bexhill.

Where development interacts with the railway through its proximity, Network Rail should be consulted to ensure no adverse impacts on the railway. Additionally, any new crossings over the railway (not at grade) such as bridges or roads that connect development should also be designed in conjunction with Network Rail.

Summary

The rail network within Rother provides a good basis to pursue development opportunities and to promote sustainable transport as a genuine alternative to using the car.

Network Rail supports the identification of public transport and promotion of active and sustainable travel within the Plan. The Plan should continue to be developed, with appropriate policies and site allocations which promote the rail network in encouraging its usage and pursuing development opportunities.

Network Rail are keen to continue to work with the Council and other stakeholders in helping to deliver transport and infrastructure improvements for the benefit of residents of Rother.

I trust the above is of use and if there any issues raised that needs further discussion then please do not hesitate to contact me.

Kind regards,

Craig Hatton MRTPI
Senior Town Planner