

**The Northern Parishes Group
The Rother District Local Plan**

Planning and Compulsory Purchase Act 2004 s 19 and The Town and Country Planning
(Local Planning) (England) Regulations 2012 2012/767 Regs 2, 5-6, 8-10 and 17

**Submission from the Northern Parishes Group
Part 2 The Bewl Water submission**



Part of Rother District's threatened ornithological assets

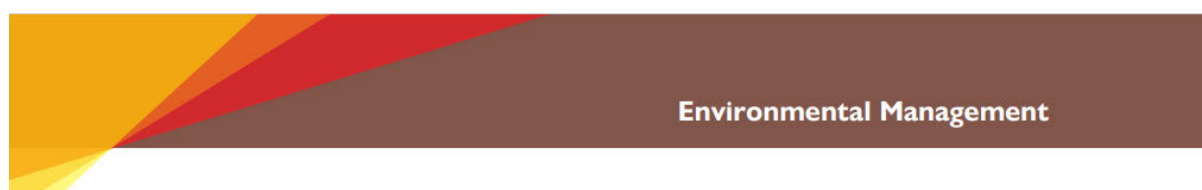
- 1 The Northern Parishes group (known in this document as the group) and the Friends of Bewl Water consider that the environmental and particularly the ornithological position at Bewl Water is so precarious that both Rother District Council and Wealden District Council should address this issue and insert a policy about Bewl Water in their draft plans. The Northern Parishes group working with Wadhurst and Ticehurst Parish Council and the Friends of Bewl Water drafted a section for the Wealden draft Local Plan to deal with the special position of Bewl Water, entitled 'Policy ENV4 Bewl Water'. The proposal accompanies this submission.
- 2 The public perception about the threats to Bewl Water are such that a petition to Save Bewl Water attracted over 79,500 signatures. It is believed that Rother District Council is determined to make this plan Green to the Core. The Northern Parishes group wants to work with Rother District Council and to ensure that this is not just a byline but is an active policy. The centre of any green policy is the protection of its key environmental sites. The group also wants to work with Rother District Council and to ensure that Live Well Locally is also not just a byline but is another active policy. One of the most important factors of mental and physical good health is the protection of open spaces, their environmental properties and their outdoor pursuits. Sites that are in the countryside with water are particularly important. Bewl Water used to have a large active community using walking, bird watching, cycling, rowing, sailing, canoeing, horse riding, fishing facilities available at Bewl Water.
- 3 It is noted that the only references to Bewl Water in the Rother Draft Local Plan state:

‘para 6.34 ‘Some of Rother’s key recreational facilities come in the form of its waters, including the coast, and Bewl Water which crosses into both Tunbridge Wells Borough Council and Wealden District Council.’

‘ para 11.5 The surface water sources within Rother comprise three reservoirs at Bewl Water, Darwell Reservoir and Powdermill Reservoir. Bewl Water is situated at the northern edge of the district and straddles the adjacent authorities of Tunbridge Wells and Wealden. The reservoir is an important regional resource but is also a significant recreational amenity. Policies relating to the recreational use of Bewl Water, and other water-based recreation, is contained in the Health and Wellbeing chapter within Policy HWB5 (Green and Blue Infrastructure).’

- 4 The group has looked at draft plan policies GTC1-2, 4, 6-9; LWL 2-5; HWB 1, 3-5; LAN 1-3 and ENV 5 and consider that although these plans are well drafted they will provide no effective protection for Bewl Water.
- 5 It is suggested that it is necessary to have adequate protection policies in place and also state the importance of Bewl Water, both locally and internationally.
- 6 While Bewl Water is in three different district councils, it seems logical that the details of the plan should be the same for each District Council. The consultation period for the Tunbridge Wells District Council Local Plan has concluded. With this in mind, the group believes where possible that the wording should be the same in each plan. However, the authors of the Rother Local Plan will know that each local plan has its own style. Where possible the Rother District Local Plan style is used.
- 7 The authors at Rother District Council are reminded that when the next Boundary Commission invites submissions, it would be an appropriate moment to recommend that the whole of Bewl Water should be in one District Council. Our provisional recommendation is it should be entirely in the Rother District.

Proposed policy to inserted in the draft Rother Local Plan



Proposed Policy ENV4: Bewl Water

Policy Status	Non-strategic
New Policy	Yes
Overall Priorities	Green to the core and Live Well Locally

Policy Wording

- 1) In order to prevent adverse effects on the integrity of Bewl Water, development will only be permitted when it can be shown that there would be no significant impact on wildlife, (and particularly birdlife), the dark skies and the tranquil nature of the area.
- 2) The ancient woodland and special Dame Sylvia Crowe landscape planting needs enhanced protection.
- 3) Residential development should be restricted to where exceptional circumstances exist. These will be exceptionally limited and are unlikely to occur during the lifetime of this plan.
- 4) Quiet daytime recreational activity should be encouraged. Sailing, rowing and angling should be particularly encouraged.

Nighttime activities should be curtailed in line with the restrictions currently in place.'

Explanatory text

'Bewl Water: The most significant gull roost in southern England

11.36 Bewl Water is located within the High Weald National Landscape and is at the northern point of Rother District Council, between Wadhurst and Ticehurst in Sussex.



Figure 41 The purple line is Rother District boundary. The area south of the line is Rother District. The area to the north-west is Wealden District Council. The area to the north-east is Tunbridge Wells District Council.

11.37 Three-quarters of Bewl Water and 7/8th of the reservoir is in Rother District.

Insert map showing the boundary

Figure 41 Plan of Bewl Water showing the site boundary

11.38 The landscape design was by Dame Sylvia Crowe DBE, a renowned internationally respected landscape architect. In 1971, Dame Sylvia Crowe said her aim at Bewl Water was 'to mend the organic structure of the countryside where it has been disrupted by the coming of the reservoir, and to accept the water as a natural feature rather than a recent and unnatural intrusion' This was achieved by tree planting, by hiding car parks behind curving banks, by designing buildings in local styles, by planting

flood tolerant species on the water margin, and by using agricultural fencing instead of the urban fencing which typified pre-1960 reservoirs.

11.39 The Bewl Water site is 486 hectares. There are 366 hectares (880 acres) of reservoir with a 15 mile shoreline. Over 120,000 trees were planted near the shoreline to provide the right ecological balance for the site. It is the largest expanse of open water in southern England and it is the fifth largest expanse of water in England.

11.40 Over 221 bird species have been recorded at Bewl Water. There is no other expanse of water in England that has attracted such a high bird count. Within the bird count there is a very large number of migrating birds. In February 2016, the number of roosting gulls present there was estimated to be over 120,000. Since then, bird flu has decimated all species of gulls, so they need even greater protection.

11.41 Sussex Biodiversity records for Bewl Water, for 1 September 2022, classify the site as a Local Wildlife Site with 479 protected and designated species, including 20 types of dragonflies, damselflies, declining pollinators such as bees and butterflies, small mammals, nine types of bat, amphibians and reptiles.

11.42 The reservoir is an important regional resource but is also a significant recreational amenity. Additional policies relating to the recreational use of Bewl Water are contained in the Health and Wellbeing chapter within Policy HWB5 (Green and Blue Infrastructure).'

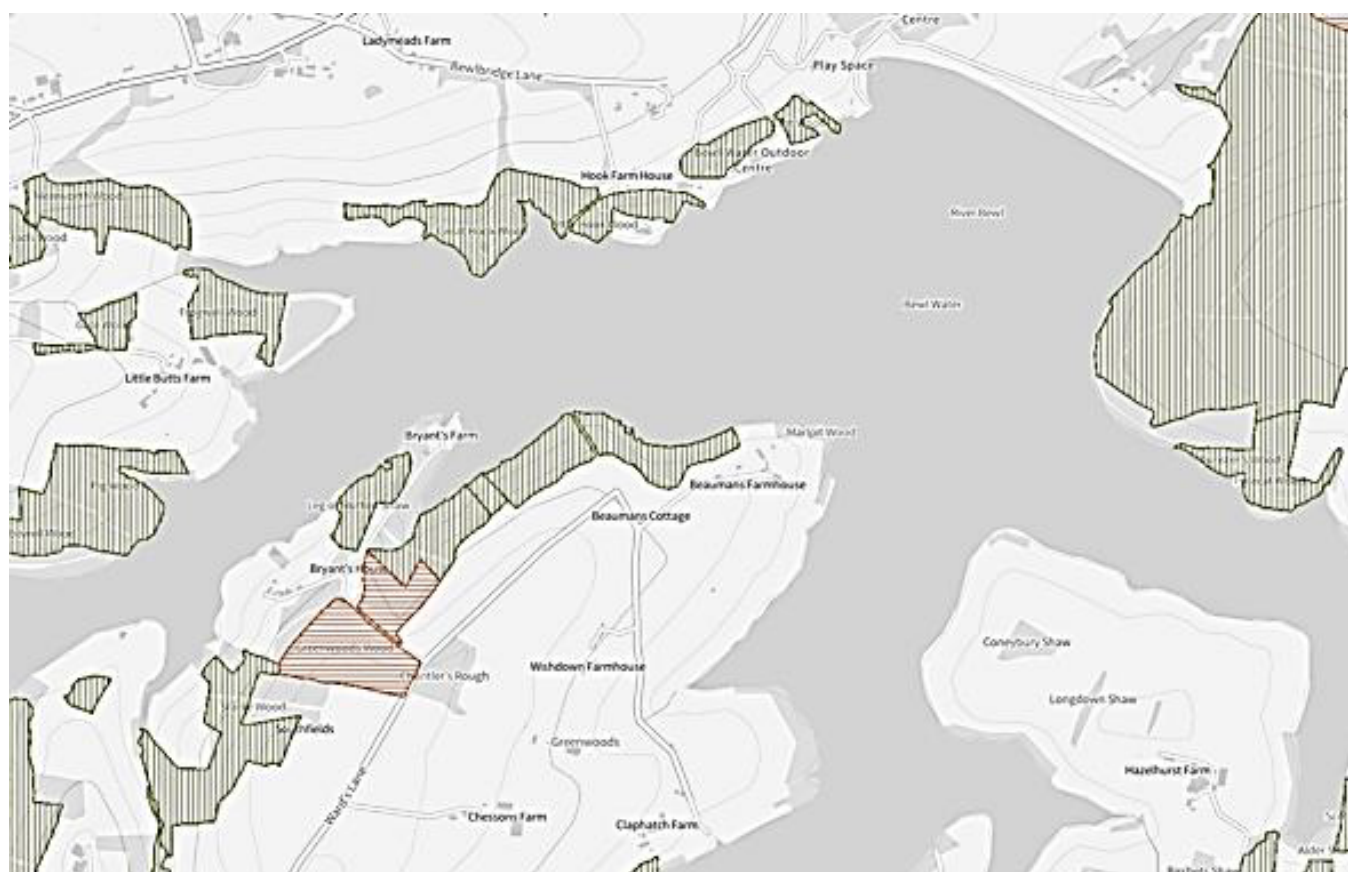


Figure 42 Bewl Water Defra Magic Maps

Vertical bars denote ancient and semi-natural woodland and horizontal bars denote ancient replanted woodland

11.41 The site has ancient woodland and adjoins Chingley Wood, part of which is designated as a SSSI site and contains a high proportion of ancient woodland.

11.42 Bewl Water has daytime leisure activities which are important to the local communities and the tourist industry. The daytime activities include sailing, rowing, fishing, walking, cycling and horse riding. When the site was under previous management, annual visitor numbers of over 200,000 were achieved. Currently, there are about 150,000 visitors a year. Apart from fishing boats and emergency vehicles, no motorised transport is allowed except in the car parks and access road. This part of the High Weald National Landscape has particularly dark skies when compared with other parts of the National Landscape. Meter reading in Wadhurst Parish nearby indicate that the Bewl Water area has some of the darkest skies in the Southeast. Ssky Quality Meter readings indicate skies as dark as 21.09 mags/arcsec², a figure that corresponds to a Silver Tier International Dark Sky Reserve.

For the wildlife and the visitors, the tranquillity of the area is important.

11.43 Avoidance and mitigation measures are necessary to ensure that there is the necessary protection of the site, particularly for its tranquillity, its internationally important ecology, and its exceptional ornithological features. The avoidance and mitigation measures should take into account how light sensitive and noise sensitive the area is between dusk and dawn.

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- 8 The authors of the draft Local Plan are invited to reflect very carefully on the need for adequate protection for Bewl Water.

Robert Banks

Northern Parishes Group

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10 June 2024