

Tunbridge Wells Borough Council (TWBC) comments on Rother District Council's Local Plan Regulation 18 (part 2) Consultation – 26 January – 23 March 2026

Link to consultation: <https://www.rother.gov.uk/planning-and-building-control/planning-policy/emerging-local-plan/local-plan-review/>

Link to Local Plan: <https://rdcpbublic.blob.core.windows.net/website-uploads/2026/01/Local-Plan-Compressed.pdf>

TWBC's response focusses on the proposed Development Strategy, development needs, and allocated sites which may impact Tunbridge Wells Borough, with additional commentary for those matters that may have cross boundary implications for Tunbridge Wells Borough.

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Part 1, chapter 2	Strategic Spatial Objectives	1. Do you have any comments on the amended Rother Local Plan Strategic Spatial Objectives shown in Figure 1?	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. TWBC particularly supports the improved focus on climate change mitigation and adaption in objective 1, the inclusion on 'timely delivery of strategic and other supporting infrastructure' in objective 7, and the inclusion of 'including to support active travel' in objective 8. TWBC also supports the inclusion of the new objective 11 relating to making the optimal use of land, including brownfield land, and achieving appropriate densities on sites.
Part 2, chapter 3	Development Needs	2. Do you have any comments on the Council's proposed housing target for the Local Plan of 8,427 dwellings over the 17-year plan period, or	TWBC notes that RDC's housing need is 15,504 dwellings (921 dpa) over the plan period (using the standard method). TWBC objects to RDC's development strategy because RDC should plan to meet its full need. RDC should continue investigate all potential opportunities to increase housing provision within its plan area. Any shortfall/unmet need should be robustly justified and backed up by appropriate evidence.

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		495 dwellings annually?	<p>TWBC notes that it has provided comments on the Vision for Northern Rother and regarding site allocations in Northern Rother in its response to question 14.</p> <p>TWBC acknowledges that RDC wrote to TWBC by letter dated 4 March 2026 to request assistance in accommodating unmet housing need. TWBC is preparing its response at the time of writing.</p>
		3.Do you have any comments on the identified employment needs, or needs for retail and main town centre uses?	<p>TWBC notes that the Rother Retail and Town Centre Uses Study (2023) concludes that there is no need at the district-level for new retail floorspace over 10 years, and that as a result RDC is not seeking to allocate land for new retail floorspace to meet identified need other than as part of mixed-use developments.</p> <p>TWBC acknowledges that RDC has commissioned a Housing and Economic Development Needs Assessment with Hastings Borough Council which will become available later in 2026. TWBC may wish to comment further on this policy at Regulation 19 when the updated HEDNA is available.</p>
		4.Do you have any comments on the identified accommodation needs of gypsies, travellers and travelling showpeople?	<p>TWBC notes RDCs Gypsy and Traveller requirement is for 28 pitches and no Travelling Showpeople plots within the plan period, based on the East Sussex GTAA (2022). RDC currently has an outstanding requirement of 18 pitches across the plan period and intends to meet its own need, which TWBC supports.</p> <p>RDC uses the PPTS compliant definition (as defined in December 2023). TWBC uses the broader, ethnic definition. TWBC is seeking to meet the 'ethnic' need to ensure that the needs of all households who ethnically identify as Gypsies and Travellers are accounted for, regardless of whether they have ceased to travel. For the same reason, TWBC would recommend that RDC also takes this approach in applying the 'ethnic' need rather than the PPTS definition.</p>

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			<p>TWBC acknowledges that the East Sussex GTAA is due to be updated during 2026 and may wish to comment further on this policy at Regulation 19 when the updated document becomes available.</p>
Part 2, chapter 4	Infrastructure needs	5.Do you have any comments on infrastructure needs or priorities to support the proposed Development Strategy?	<p>TWBC notes the updated draft IDP 2026 Parts A and B.</p> <p>TWBC considers that there is a lack of reference to cross-boundary infrastructure working in the updated Infrastructure Delivery Plan (IDP). The IDP should specifically refer to Kent County Council and NHS Kent and Medway ICB as relevant authorities in the Transport, Education, and Health and Social Care sections as well as in any other sections where cross-boundary working and impacts would make it relevant.</p> <p>The Local Plan paragraph 4.8 should also refer to cross-boundary key stakeholders which should include Kent County Council and NHS Kent and Medway ICB.</p> <p>The IDP acknowledges that the A21 and A259 corridors will require capacity management and selective enhancements to accommodate forecast growth. TWBC supports the proposed A21 road safety improvement schemes but notes there is no proposed scheme to improve congestion at Flimwell junction. Given the proposed growth in Flimwell of 146 dwellings and the total Northern Rother sub-area growth of 996 dwellings,it is expected that improvements will be required to mitigate development impacts at this junction. TWBC considers that improvements to the Flimwell junction would also form an important aspect of bringing forward spatial development option SDO13, however it is noted that there is little detail provided on plans to achieve this or on the wider proposed highway improvements to support growth in Robertsbridge/Salehurst, Hurst Green, and Flimwell under this option.</p> <p>TWBC requests that more information is provided on plans to support growth at Etchingham, Robertsbridge and Stonegate railway stations, given the proposed level</p>

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			<p>of growth in Northern Rother. This should include analysis of bus routes and bus capacity to serve these stations. It is noted that the draft IDP does not refer to any planned improvements to the London – Hastings line. TWBC recognises that some improvement work was complete in late 2025 to the line, but would welcome more information on how car parking demand would be met in the future and on any improvements or changes to local bus services.</p> <p>TWBC also questions the suitability of Hurst Green</p> <p>...</p> <p>TWBC notes a lack of detail regarding how increasing secondary school place requirements will be met. Acknowledgement should be given to cross-boundary movement of students, especially with regards to proposed growth in the Northern Rother sub-area and a consequent consultation with KCC education.</p> <p>The IDP acknowledges that more than half of Rother’s population live in rural or fringe areas, where access to GP services can be more difficult. Given the proposed growth in the Northern Rother sub-area, reference should be made to cross-boundary provision of health services. TWBC notes that the IDP recognises that the Tunbridge Wells Hospital (Pembury) and Hawkhurst Community Hospital (Kent) are likely to meet some local health related needs and therefore needs to clearly set out details on consultation with relevant health providers.</p>
Part 3, chapter 5	Preparing the Development Strategy	6. Do you have any comments on the Council’s assessment of the additional Development Strategy Options?	TWBC notes RDC proposes to take forward new spatial development option SDO13 based on the updated HELAA findings and following its assessment in the updated Interim Sustainability Appraisal (2026). The option is for development along the A21 road corridor, focussed within and around existing settlements, where there is a reasonable level of local services. TWBC expects detail and discussion on the long-term proposals for the A21 corridor, to provide a clear understanding of what this

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			<p>would entail. These discussions should also include engagement with Kent County Council.</p> <p>It would be helpful to understand more about how the A21 related options have evolved over time. TWBC notes that the initial preferred approach set out in the previous Regulation 18 consultation included option 'A21 corridor growth with a new sustainable transport corridor'. This option has been carried forward to the current draft Development Strategy, along with the new option for development along the A21 road corridor, focussed within and around existing settlements. TWBC recognises that due to uncertainty around funding of works to support an A21 sustainable transport corridor, that RDC wishes to explore other options relating to the A21. TWBC expects that further information and evidence to support these options, including detailed transport modelling and evidence of consultation with the relevant highway authorities, will be made available at Regulation 19 and wishes to comment further at that stage.</p>
		<p>7.Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?</p>	<p>TWBC notes the increased higher density options for different area types, which are based on the outcomes of the Density Study (2026). TWBC is supportive in principle of achieving optimal density on sites as a means of meeting local housing needs. However, RDC should continue to investigate all opportunities for increasing housing provision within the plan area with the aim of meeting the housing needs of the district;</p>
<p>Part 3, chapter 6</p>	<p>Development Strategy for Rother</p>	<p>8.Do you have any comments on the Council's proposed</p>	<p>TWBC notes that the given housing target of 8,427 dwellings is less than the district's housing requirement based on the standard method. TWBC recognises that Rother is a highly constrained district but asserts that RDC should plan to meet its full housing need. RDC should continue to apply the 'no stone left unturned' approach to</p>

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		Overall Development Strategy?	<p>identifying and allocating development sites. Tunbridge Wells Borough is also highly constrained by Green Belt, National Landscape and areas of flood risk.</p> <p>TWBC considers that further transport modelling and flood risk modelling are required to support the proposed strategy, as the Shared Transport Evidence Base and SFRA documents are not up to date. Updates to these, and where necessary, any other supporting evidence base documents should be available for the Regulation 19 consultation. TWBC wishes to review and comment on those as necessary, at the time. In the meantime, there should be continued engagement through Duty to Cooperate meetings.</p> <p>TWBC would 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 County Council Highways in particular, and with National Highways as the responsible body for the strategic road network.</p>
		9.Do you have any comments on the proposed growth opportunities in the sub-areas as shown in Figure 10?	<p>TWBC notes the proposed site allocations in the Northern Rother sub-area and further comments are made on this below.</p> <p>In general, TWBC questions whether the proposed level of growth in the Northern Rother sub-area is suitable given its existing infrastructure. The proposed level of growth in the sub-area has significantly increased above the range provided in the previous Regulation 18 consultation draft Local Plan. It is noted that this sub-area is proposed to support the second highest level of growth in the district, after Battle and its surrounding settlements. TWBC considers that Northern Rother is unlikely to present the same opportunities for sustainable development than Battle, and that residents will be required to utilise infrastructure outside of the district (for example, in Tunbridge Wells borough).</p>

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			<p>As noted previously, TWBC asserts that exceptional circumstances for allocating sites within the High Weald National Landscape should be clearly demonstrated and justified. TWBC also expects that the cumulative impact of the potential development sites, including any in combination impacts with sites already identified, are fully considered in the supporting documents for the Local Plan.</p>
		<p>14.Do you have any comments on the proposed Vision and development strategy for Northern Rother, including the development figures shown in Figures 26 and 27?</p>	<p>TWBC notes that proposed site allocations in the Northern Rother sub-area propose some 996 dwellings and 4,350 sqm employment land.</p> <p>The Northern Rother Vision 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 therefore expect that the infrastructure requirements to support the potential level of growth must be fully investigated through engagement with the relevant infrastructure providers and other service providers (including 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. This should include a full assessment of the impacts of development on Flimwell Junction. 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>Paragraph 6.84 refers to the network of village primary schools in Northern Rother but does not mention secondary school capacity. Reference should be made to working with KCC and ESCC to better understand secondary school provision and student movement across borough/district borders, and how to best support planned population growth.</p>

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			<p>TWBC questions the vision statement that ‘local environmental impacts are lessened due to an increase in the uptake of electric vehicles and a corresponding increase in available EV charge points.’ Whilst carbon emissions may be reduced, there will still be increased vehicular traffic and impact on road surfaces from traffic. Clarity should be provided on this point.</p> <p>TWBC asks that the Vision make greater reference to how RDC proposes to work with neighbouring authorities, including TWBC and KCC, to support sustainable development in Northern Rother.</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 Local Plan is progressed.</p> <p>The vision acknowledges that works to support the A21 as a sustainable travel corridor may not come forward during the timescale of the Local Plan. Consideration should be given to how RDC will support sustainable travel on this route in the case that funding does not come forward, including by working with neighbouring authorities. This is especially important given that the Local Plan sets out that option SDO13 is focussed on supporting growth in the Northern Rother area.</p> <p>.</p> <p>..</p>
		15.Do you have any comments on the proposed Vision for the Countryside?	TWBC does not wish to comment on this policy.
		16.Do you have any comments on the	TWBC does not wish to comment on this policy.

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		proposed strategy for Gypsies, Travellers and Travelling Showpeople?	
Part 3, chapter 7	Proposed site allocations for Northern Rother	56.Do you have any comments on the proposed site allocations in Hurst Green, detailed in Policies HG1 to HG4?	<p>TWBC notes that the proposed site allocations in Hurst Green would provide a total of 239 dwellings. TWBC questions whether Hurst Green is a suitable location to support such as high scale of development, given its lack of facilities.</p> <p>Any development coming forward will need to consider any impacts on the adjacent land within the Tunbridge Wells borough area, and in terms of infrastructure provision with Kent County Council as well as East Sussex County Council.</p>
		59.Do you have any comments on the proposed site allocations in Flimwell, Ticehurst Parish, detailed in Policies FW1 to FW3?	<p>TWBC notes that the proposed site allocations in Flimwell would provide a total of 146 dwellings.</p> <p>Any development coming forward will need to consider any impacts on the adjacent land within the Tunbridge Wells borough area, and in terms of infrastructure provision with Kent County Council as well as East Sussex County Council.</p>
		61.Do you have any comments on proposed Policy TC3: Bewl Water?	TWBC strongly supports this policy and its criteria for development allowed at Bewl Water.
		64.Do you have any comments on the proposed site	TWBC does not wish to comment on these policies but notes that it considers that RDC should plan to provide sufficient site allocations to meet its needs based on the ethnic definition of Gypsies, Travellers and Travelling Showpeople.

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		allocations for Gypsies, Travellers and Travelling Showpeople, detailed in Policies GYP1 to GYP6?	
		65.Do you consider that there are any other possible sites for Gypsy, Traveller or Travelling Showpeople sites which should be allocated in the Local Plan?	TWBC does not wish to comment on this policy.
Other	Other	Duty to Cooperate	<p>TWBC notes the updated Duty to Cooperate interim statement.</p> <p>TWBC also notes reference 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>
		Sustainability Appraisal	The SA should clarify whether the development around Bexhill will work towards or set the framework for the sustainable transport corridor coming forward in the future, or at least not hinder its potential.

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Vision for Northern Rother P93 - 99		Q14. Do you have any comments on the proposed Vision and development strategy for Northern Rother, including the development figures shown in Figures 26 and 27?	<p>It is noted that residents in Northern Rother are likely to use services in Tunbridge Wells borough and Wealden district. Given that travel from new housing development is most likely to be by car, TWBC questions the numbers of new dwellings at Hurst Green, Flimwell and Burwash particularly before there is greater certainty on transport improvements to the A21 corridor. TWBC notes that the total numbers of properties proposed to be allocated/already have permission, across Northern Rother is 996. The percentage of new dwellings at Etchingham and Robertsbridge is 45%. As these are the most sustainable locations on the mainline route to London from Hastings, TWBC question if there is scope for further development at Etchingham rather than some of the less sustainable villages such as Flimwell and Hurst Green. More information should be provided on why large site allocations at Robertsbridge and Ticehurst have not been taken forward. The positive benefits of development at less sustainable locations should be clearly identified.</p> <p>TWBC also suggests that RDC should investigate and report on the capacity for car parking at Etchingham, Stonegate and Robertsbridge railway stations given the proposed level of residential and employment land growth in the surrounding sub-area of Northern Rother. RDC should also set out a strategy for bus route connectivity to these railway stations, which should include consideration of timetables and bus passenger capacity.</p> <p>Development in Northern Rother should include affordable housing of an appropriate size to assist in meeting local housing need.</p> <p>TWBC welcomes that larger scale development at Merriments and Flimwell can provide improved 'pedestrian connectivity'. Cross boundary consultation should focus on where these improved connections are going to take place ensure that they improve sustainability of the local services for example at Hawkhurst in Tunbridge</p>

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			<p>Wells Borough, close to Flimwell to ensure that the most sustainable modes of transport are used by new residents.</p> <p>TWBC notes that RDC applies an adopted CIL Charging Schedule as its mechanism for securing funding from development. TWBC uses Section 106 (S106) agreements to secure developer contributions. In the case that the proposed traffic improvements (and any other infrastructure improvements for example for secondary education or health provision) raise issues of cross-boundary funding, RDC should coordinate with TWBC to ensure funding is properly managed.</p>
Proposed Site Allocations for Northern Rother	Flimwell	FW1	TWBC considers that Policy Reference FW1 point ii. should identify that multiple Highway Authorities, including Kent County Council, must confirm the suitability of the proposed new vehicular access.
	Flimwell	FW2	TWBC considers that Policy Reference FW2 point ii. should identify that multiple Highway Authorities, including Kent County Council, must confirm the suitability of the proposed new vehicular access.
Evidence base			<p>As a general point, TWBC notes that some key evidence base documents are incomplete at this stage. This includes the Housing and Economic Development Needs Assessment and the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment which are not due to be completed until later in 2026; and a lack of information and evidence regarding the proposed plans for the A21. TWBC recognises that RDC is under pressure to submit its Local Plan for examination under the current arrangement (before 31 December 2026), but an incomplete evidence base makes it difficult for TWBC to provide comprehensive comments on some matters.</p>

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