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Dear Sir / Madam,

### **Wealden Local Plan – Direction of Travel**

Railfuture is Britain's leading, longest-established, national independent voluntary organisation campaigning exclusively for a better railway across a bigger network for passenger and freight users, to support economic (housing and productivity) growth, environmental improvement and better-connected communities.

We seek to influence decision makers at local, regional and national levels to implement pro-rail policies in transport and development planning.

We offer responses below to your questions where we consider it appropriate and within scope for our organisation.

Yours faithfully,

Roger Blake BA, MRTPI (Rtd), MTPS  
Railfuture  
Director for Infrastructure & Networks, national Board  
Vice-Chair London & South East regional branch

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## 4 Tackling Climate Change

### Question 1

#### What do you think?

1. Are there any issues or challenges that we have missed? Policy Option 4 makes no specific reference to public transport, which appears to us to be at odds with Reason 4 in paragraph 1.14, Section 2 of Chapter 1.
2. Do you agree with the proposed policy options? Broadly yes.
3. Do you disagree with any of the options? No.
4. Are there any other policy options we should be considering? An overt commitment to consider the existing and potential connectivity of new development in development planning and development management decisions.
5. Do you have any other comments in relation to how we can plan to combat climate change? We welcome the commitment *“to implementing a plan-led approach to development that minimises and mitigates against emissions from new development. This necessitates a new strategic vision for the future of the district and a new place making strategy for how this will be achieved.”* (Reason 4 in paragraph 1.14, Section 2 of Chapter 1). With near-half of Wealden’s CO2 emissions related to the transport sector (paragraph 4.6) the location and connectivity of new development will be an increasingly vital consideration in future decision-taking.

## 5 Infrastructure to Support Growth

### Question 2

#### What do you think?

6. Are there any issues or challenges that we have missed? Self-evidently, pressure on public infrastructure is added by new development anywhere, and the Local Plan might usefully explore the relative impacts across different settlement sizes. Are the pressures of 1,000 new homes added to an existing large town, for example, which is often perceived to ‘overload’ existing services, more readily-absorbed by them and insufficient to warrant significant new public infrastructure, compared to those homes being added to a smaller and poorly-served community dependent on transport to other centres when a new critical mass will have been reached and significant new public infrastructure becomes justified?
7. Do you agree with the proposed policy options? Yes.
8. Do you disagree with any of the options? No.
9. Are there any other policy options we should be considering? No.
10. Do you have any other comments in relation to how we can support the delivery of infrastructure within Wealden? Notwithstanding our previous responses 4-9, we single out for particular commendation the first three policy options for their recognition of the vital importance of the location of new development in securing sustainability in all its forms, especially in relation to transport infrastructure and securing good connectivity, and the declared commitment in the second policy option here to *“favour development in locations where existing sustainable transport routes are in place (or where this can be provided)”*. We note with disappointment the absence of reference in paragraph 5.21 to the new shadow sub-national transport body Transport for the South East which having adopted its 30-year Transport Strategy in July 2020 is now embarked on a series of Area Studies to underpin its Strategic Investment Plan in 2022. That is another influential channel through which to *“Work closely and collaboratively with the significant infrastructure providers that play a role within Wealden ... to ensure that the right infrastructure is provided at the right time and right location”* and *“Work closely and collaboratively with neighbouring local planning authorities ... to identify cross boundary infrastructure issues and funding where this is required”*. It is notable that the Terms of Reference for the South Central Radial Area Study now identify a key corridor between Brighton and Tunbridge Wells – inevitably across Wealden District! We regard this as a strategic opportunity to shape the location of new development at scale.

#### **Wealden Local Plan – Direction of Travel**

## 6 Housing

### Question 3

#### What do you think?

11. Are there any issues or challenges that we have missed? The pivotal role of 'housing' in broader spatial planning and place-making, with lateral policy linkages particularly to 'Infrastructure to Support Growth' and 'Our Growth Options', may be marginalised in an understandable pre-occupation with the demands in the vertical silo marked 'housing'.

Paragraph 6.17 omits to acknowledge the influence and acceptance, even preference, of widespread working from home during the Covid-19 pandemic on future locational choices. As a greater proportion of the economically-active population commute less often, but likely further for a similar time budget, Wealden's attractions may appeal to more incomers, reinforcing the need for new development to be focussed on existing, and potentially new, rail-served locations to help minimise additional pressures on the district's road network.

12. Do you agree with the proposed policy options? Yes.

13. Do you disagree with any of the options? No.

14. Are there any other policy options we should be considering? Reflecting our response to Question 2 and its particular reference to Chapter 5's second policy option, to embrace in this chapter the possibility countenanced in chapter 14 of creating new and / or more-sustainable locations for housing growth through for example significant infrastructure investment such as a new railway line and / or station, in addition to consideration of locations which may be deemed already sustainable.

15. Do you have any other comments in relation to how we can plan to deliver housing, including the range, type, size and tenure? No.

### Question 4

#### What do you think?

16. Are there any issues or challenges that we have missed? Outside our scope.

17. Do you agree with the proposed policy options? Outside our scope.

18. Do you disagree with any of the options? Outside our scope.

19. Are there any other policy options we should be considering? Outside our scope.

20. Do you have any other comments in relation to how we can plan to deliver affordable housing, including the range, type and tenure? No, outside our scope.

## 7 Our Local Economy

### Question 5

#### What do you think?

21. Are there any issues or challenges that we have missed? The value to the district economy of the 30,000 out-commuters, depending on where they work, according to their net worth and contribution to supporting other employment in their home district. A general expectation would be that London commuters for example are disproportionately 'valuable' to Wealden for their higher incomes, and something similar may be true of other relatively higher-value destinations such as Tunbridge Wells and Brighton.

22. Do you agree with the proposed policy options? Yes.

23. Do you disagree with any of the options? No.

24. Are there any other options we should be considering? For those economically-active residents with higher-value employment centres outside the district but commuting to them post-pandemic less often, a combination of personal preference and policy imperative will in our view accord ever higher priority to ready access to rail services.

25. Do you have any other comments in relation to how we can plan for employment within both the urban and rural areas of our district? In a post-pandemic, carbon-reducing future we are in no doubt that the existing, and potential future, rail network must be the focus for the development of employment opportunities – for employers, employees, customers etc.

## 8 Our Town and Local Centres

### Question 6

#### What do you think?

26. Are there any issues or challenges that we have missed? It is significant to us that of the three “*higher order town centres located outside of the district, such as Tunbridge Wells, Eastbourne and Brighton, (which) exert a strong influence on shopping patterns and expenditure flows within the district, where a significant proportion of our residents shop outside the district to meet their overall shopping needs*” which are cited in paragraph 8.14 and illustrated in Figure 16, the first is only accessible by rail from a very small part of the district, and the third is not accessible by rail from any part of district. As suggested in our responses to 21 and 24 in Question 5 above, that deficiency could become increasingly important for the ‘higher net worth’ individuals and their families who may otherwise have been newly attracted to relocate into the district. It should also be noted that were direct rail access to be restored between Wealden and Brighton that would at least indirectly, and depending on the configuration possibly directly, create rail access to Eastbourne for a substantial additional area of the district; the same would be the case were scheduled mainline passenger services to be added to the Eridge-Tunbridge Wells route. This all adds to the potential significance of the Brighton-Tunbridge Wells corridor now identified for further study by Transport for the South East.

27. Do you agree with the proposed policy options? Yes.

28. Do you disagree with any of the options? No.

29. Are there any other policy options we should be considering? No.

30. Do you have any other comments in relation to how we can plan for retail in our town and local centres? No.

## 9 Tourism

### Question 7

#### What do you think?

31. Are there any issues or challenges that we have missed? Recognition of the role and value of third sector actors supporting sustainable travel in general and sustainable tourism / the visitor economy in particular. A specific example is the Department for Transport-accredited Southeast Communities Rail Partnership whose activities and local community networks cover the Uckfield (and East Grinstead) and Hastings-Tonbridge lines.

32. Do you agree with the proposed policy options? Yes.

33. Do you disagree with any of the options? No.

34. Are there any other policy options we should be considering? No.

35. Do you have any other comments in relation to how we can plan for tourism and culture within the district? There is no doubt in our mind that restoration of direct rail links between Wealden and Lewes and Tunbridge Wells districts would enable more sustainable tourism especially for visits to the South Downs National Park via Lewes which is located within it.

## 10 Our Natural Environment

### Question 8

#### What do you think?

36. Are there any issues or challenges that we have missed? The threats to biodiversity from emissions of all sorts from vehicular road transport, be they greenhouse gases or particulates (‘The Oslo effect’).

37. Do you agree with the proposed policy options? Yes.

38. Do you disagree with any of the options? No.

39. Are there any other policy options we should be considering? Consider the biodiversity impact of significant new development. Badly-located with poor connectivity, it could generate disproportionate emissions from additional journeys using more-polluting modes in proximity to “*local wildlife-rich habitats and wider ecological networks, including internationally, nationally and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them and areas identified for habitat management, enhancement, restoration or creation.*” (paragraph 10.15)

40. Do you have any other comments in relation to how we can plan for biodiversity within the district? No.

## Question 9

### What do you think?

41. Are there any issues or challenges that we have missed? Outside our scope.

42. Do you agree with the proposed policy options? Yes.

43. Do you disagree with any of the options? No.

44. Are there any other policy options we should be considering? Outside our scope.

45. Do you have any other comments in relation to how we can plan for green infrastructure and green/blue spaces within the district? No.

## 11 Our Landscape, Heritage and Cultural Assets

### Question 10

#### What do you think?

46. Are there any issues or challenges that we have missed? The impact of additional transport infrastructure on landscape, arising from the effects of the location of significant new development on people’s range of travel options and choices.

47. Do you agree with the proposed policy options? Yes.

48. Do you disagree with any of the options? No.

49. Are there any other policy options we should be considering? No.

50. Do you have any other comments in relation to how we can plan for landscape within the district? Paragraphs 11.11-11.16 in particular crystallise the district’s dilemma: accommodating significant and sustained development growth, unavoidably tilted towards greenfield locations, impacting on landscapes whose very quality is valued highly by existing and future residents, and businesses. Locating such development growth in proximity to existing, and potential future, rail services has in our view an important part to play in minimising the need for future large-scale highway developments.

### Question 11

#### What do you think?

51. Are there any issues or challenges that we have missed? Outside our scope.

52. Do you agree with the proposed policy options? Yes.

53. Do you disagree with any of the options? No.

54. Are there any other policy options we should be considering? Outside our scope.

55. Do you have any other comments in relation to how we can plan for heritage and cultural assets within the district? No.

## 12 Design

### Question 12

#### What do you think?

56. Are there any issues or challenges that we have missed? Outside our scope.

57. Do you agree with the proposed policy options? Yes.

58. Do you disagree with any of the options? No.

59. Are there any other policy options we should be considering? Outside our scope.

60. Do you have any other comments in relation to how we can plan for high quality development through good design within the district? No.

## 13 Health and Well-Being

### Question 13

#### What do you think?

61. Are there any issues or challenges that we have missed? No.
62. Do you agree with the proposed policy options? Yes.
63. Do you disagree with any of the options? No.
64. Are there any other policy options we should be considering? No.
65. Do you have any other comments in relation to how we can plan for health and wellbeing within the district? We especially endorse the third policy option: *“Ensure the location of new housing development (including site allocations) is situated on land and in areas accessible to employment, services & facilities (including healthcare and community), public transport, open space, walking and cycling routes in order to create walkable neighbourhoods”*.

## 14 Our Growth Options

### Question 14

#### What do you think?

66. Are there any spatial distribution options that we have missed? No.
67. What is your preferred option or combination of options in order of preference? 4, 4+1.
68. Do you disagree with any of the options presented? Option 3 – Dispersed Growth – is almost certainly the least desirable from a variety of policy perspectives.
69. What views do you have about the possibility of a new settlement somewhere in the district to provide a large proportion of development needs? ‘New settlement’ includes, as noted in paragraph 14.9, major expansion of an existing small settlement which would create a critical mass of population enabling the creation of a sustainable community. We have received through our own community engagement unsolicited feedback supporting the proposition that a new settlement *“would reduce the potential impact of development pressure on other more rural parts of the district”* (as would Option 1 – Focused Growth including Large Extensions to Existing Sustainable Settlements) and also on other settlements. After several of our earlier responses it will be no surprise that we take issue with the twin propositions that *“It is very unlikely that rail services would be connected to a ‘new settlement’ given the existing location of rail services in the district and the cost for the relocation/establishment of a new rail station within/nearby to the new settlement;”* and also *“In general, transport infrastructure in some areas of district may not be adequate or deliverable to support development of this scale.”*
70. Where do you think a possible new settlement could be located and why? In order to maximise transport connectivity and sustainability, and optimise other outcomes across a broad swathe of other policies to be covered in the Local Plan, we suggest a menu of three:
- # based on Stone Cross with a new rail station, or
  - # Polegate with a new western ‘parkway’ rail station accessed from the A27, also serving as a railhead for Hailsham especially if significant new development is located there, and
  - # Isfield to help to make the case for restoration of a rail link between Uckfield and Lewes.
- The latter would require collaboration with neighbouring Lewes District, in turn part of ‘Greater Brighton’. The formal public adoption by Transport for the South East, even since this consultation commenced, of the Brighton-Tunbridge Wells axis as a recognised corridor is a potential game-changer for shaping Wealden’s spatial strategy in the next Local Plan period. The introduction of a continuous public rail link throughout that corridor, to complement the A26 road link, would transform Wealden’s connectivity with new linkages north and south of the district and enable a re-imagining of locations for significant new development to be based on integrated rail hubs. As a development spine, not just a transport artery, the Brighton-Tunbridge Wells corridor gives Wealden the best chance in half-a-century of realising its ambition to be reconnected direct to the South Coast by rail.