

Wadhurst Neighbourhood Plan Steering Group
Wadhurst Parish Council
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Date: 17 July 2023

Dear Wadhurst Neighbourhood Plan Steering Group,

WADHURST PARISH COUNCIL
WADHURST NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION
(Regulation 16 Neighbourhood Planning General Planning Regulations 2012)

Thank you for consulting Tunbridge Wells Borough Council (TWBC) on the above document. We note and support the Vision and Objectives and spatial strategy of the Wadhurst Neighbourhood Plan, as well as the issues impacting the Wadhurst Neighbourhood Plan area.

In preparing this response, TWBC has continued to focus on aspects of the Neighbourhood Plan that could raise strategic cross-boundary issues, including issues such as infrastructure and the protection of the natural and built environment, as well as general points of clarity and consistency with national and local policy. Regard has also been given to comments made previously by TWBC at both stages of the Regulation 14 consultation.

TWBC notes and appreciates that a number of comments made in regard to the draft Neighbourhood Plan have been considered and factored into the submission version of the plan, including changes to the Bewl Water Policy WAD14 to include reference to the Tunbridge Wells Borough Council area.

As previously commented, it is noted that the provision of infrastructure to support new development is considered to be a key issue, including the aspiration of improving a variety of infrastructure facilities, including better health, leisure, and recreational facilities. These aspirations are recognised, and it is likely that this infrastructure may be used by some residents of Tunbridge Wells Borough who reside in some of the rural areas on the boundaries with East Sussex/Wealden/Wadhurst – such as rural Lamberhurst and Hawkhurst. Likewise, it is assumed that some residents of Wadhurst will utilise infrastructure within Tunbridge Wells Borough. As previously noted, it would be helpful to be kept updated with any of these projects as they progress.

Previous comments which could still be addressed:

Landscaping, Biodiversity and Open Space:

- xx. provide natural and amenity public green space within all major development sites in line with guidance and standards contained in the Wealden Open Space

Study (2022) – Area Profile Wadhurst Parish Council (part 2 of 2), or any subsequent standard set by Wealden District Council, which supersedes this assessment – TWBC would suggest that the provision of recreation open space may be better placed as a policy in its own right under the Environment section as it is considered to get somewhat lost amongst lots of other policy detail where currently placed in the Design section.

Policy WAD10 – Employment retention and local economy viability:

It is considered that the title could benefit from being re-worded and there are some inconsistencies between references within the policy (Section A and B) of which commercial uses are being referred to – Class E and also Class B2, B8 and F. This could be tidied up.

Local Economy:

This section refers to a source taken from the ‘Town Centre and Retail Study (2016)’. TWBCs understanding is that there is a more recent and updated document prepared on behalf of WDC to inform their Local Plan work by Nexus Planning, and this should therefore be taken into account and referred to in the Wadhurst Neighbourhood Plan if relevant. If this is the case, it may be useful to include as a document forming part of the evidence base at 1.19.

Additional comments on the Submission Neighbourhood Plan:

Objective 1 – Heritage, Character and Design – the last sentence seems unnecessary as it repeats the previous sentence, so TWBC suggests it is removed to make the policy more succinct.

Paragraph 2.20 key challenges – References protecting and improving the health and wellbeing of ‘parishioners’, but TWBC suggests ‘all’ be used instead of parishioners, as it is likely people who reside in close proximity to Wadhurst may also benefit, such as residents of rural Hawkhurst and Lamberhurst, for example.

More general comments on formatting/accessibility:

- Hyperlinks to the majority of documents within the Plan cannot currently be accessed – this may be due to how the final PDF version was saved/exported
- The formatting of pages 28, 29, 46, 47, 59, 63, 66, 68, 69, 74, 79 and 93 needs reviewing – the pages are currently blurred, and again, links etc within them are not currently working.
- Some documents referenced may benefit from having hyperlinks inserted, such as Local Housing Needs Assessment in Chapter 5 introductory text. Chapter 6 also references several evidence base design documents, which would benefit from being hyperlinked. This would ensure consistency across the board, as many other evidence base documents throughout the plan are hyperlinked.
- To improve navigation of the document, the contents page may also benefit from having links to each chapter, for quick and easy access to specific chapters and policies.
- Some margins need aligning, such at 4.10.

Update on Tunbridge Wells Local Plan

The new Local Plan is currently subject to Examination. The [Submission Local Plan](#) (SLP) was submitted to the Secretary of State for examination by an independent Inspector on 1 November 2021 and was then subject to a number of Examination in Public hearings which

took place between 1 March and 15 July 2022. The Council received a letter setting out the Inspector's [initial findings](#) following the hearing sessions in early November 2022.

In a [letter](#) the Council sent the Inspector, dated 17th February 2023, the Council set out an indicative timetable for the key stages in the Council's consideration of the Inspector's Initial Findings letter as well as a summary of the work being undertaken. This timetable was caveated on page 3 where it sets out that this was a provisional timetable, as it is dependent upon the implications of the outcomes of the suggested changes on matters including viability and housing supply for instance and is also subject to Members' consideration.

Work to consider the initial findings is ongoing and recently the Council provided an update to the Inspector by [letter dated 02 June 2023](#). Both these letters (along with other correspondence) have been published on the examination webpages of the Council's website. This will be updated further when we are able to do so. All correspondence is available on the [Examination latest news and updates](#) page.

Given the above, TWBCs published timetable for adoption of the new Local Plan is delayed and the plan will not be adopted in early 2023 as set out in the current Local Plan timetable and the Councils Local development Scheme (LDS). The Council will update the Local Plan timetable and LDS in due course.

I trust that this is of assistance.

Yours sincerely



Planning Policy Manager