



Planning Policy,  
Wealden District Council,  
Vicarage Lane,  
Hailsham,  
East Sussex  
BN27 2AX

**BY EMAIL ONLY**

## **Growth and Communities**

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Maidstone  
Kent  
ME14 1XX

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10 May 2024

Dear Sir / Madam,

### **Re: Consultation on the Draft Wealden (Regulation 18) Local Plan**

Thank you for consulting Kent County Council on the Draft Wealden (Regulation 18) Local Plan.

The County Council draws attention to the need for engagement between Kent County Council, Wealden District Council and East Sussex County Council regarding development which is proposed on the boundary between Kent and Wealden. To date, there has been limited engagement with Kent County Council and it would therefore ask that cross boundary matters are addressed at this early stage to ensure that adequate infrastructure is available to support new and existing communities within Wealden and Kent. It is also asked that Wealden District Council engage with the County Council in line with the Duty to Cooperate ahead of further progression on the Local Plan.

The County Council has reviewed the consultation document and has provided commentary below.

### **Highways and Transportation**

The County Council, as Local Highway Authority for Kent, considers that it is evident that there are a number of development parcels included within the consultation which both separately and cumulatively will impact on the Kent highway network. The consultation includes transport evidence and the County Council would ask that this be extended to assess the impact of the development in Kent and particularly in the neighbouring Tunbridge Wells borough. It is requested that the transport modelling is agreed with Kent County Council, as Local Highway Authority for Kent, and includes safety assessments where there are any significant increases in traffic. Where significant additional congestion and/or safety issues are identified, mitigation measures should be brought forward for agreement with Kent County Council.

## Public Rights of Way (PRoW)

Kent County Council is providing commentary given the likelihood of cross boundary interactions across the PRoW network, especially where proposed sites within the Plan border Kent. The County Council is committed to working in partnership with local and neighbouring authorities, councils and others to achieve the aims contained within the [KCC Rights of Way Improvement Plan \(ROWIP\)](#) and the [KCC 'Framing Kent's Future' strategy](#) for 2022-2026.

The County Council specifically notes proposed development at both Frant (Site 26 - 457 new residential dwellings) and Groombridge (Site 27 - 21 residential dwellings) given their proximity to the Kent boundary. The accompanying population increase could amount to 1,500 or more new residents who, given the proximity of Tunbridge Wells (in particular) as a destination for services, leisure, work and more, could reasonably seek to access facilities in Kent, thereby increasing the demand on the management of access routes. Kent County Council therefore requests that development at these sites must be required to submit a transport statement and sustainable travel plan as part of any planning application, with consideration of the impact on the Kent PRoW network.

Regarding Frant (Site 26), Kent County Council recommends that Site Reference FR1 - Land at Benhall Mill Road, recognises the existence of Public Footpath FRT/12/1 in East Sussex and Public Footpath WB49 in Kent which adjoin the site and conjoin to form a through route linking Benhall Mill Road and Forest Road respectively. In the event this site is developed, the County Council considers that it is appropriate to consider upgrading the status of these paths in order that a public cycle right exists to facilitate improved Active Travel opportunities. Mitigation of the impact of an increased number of users on Public Footpath WB49, which can reasonably be expected in the event of development, will be necessary as a minimum. As to Site References FR2, FR3 and FR5-7, whilst no existing PRoW appear to be in close proximity, Kent County Council will expect proposed development to carefully consider and provide for Active Travel means, thereby supporting efforts within Kent to encourage greater walking and cycling.

Regarding Groombridge (Site 27) and the specific site proposed within it, Site Reference WIT1 - Land south of Back Lane and to the west of railway line, the development could increase demand for use of Public Footpaths WT109 and WT431 in Kent, for access into Groombridge Place, towards Langton Green and into Tunbridge Wells itself. In the event this site is developed, Kent County Council will expect proposed development to carefully consider and provide for Active Travel means and to mitigate damage arising from increased use of these paths.

Kent County Council would also like to provide some general and informative comments on the Plan in respect of PRoW:

- Kent County Council welcomes the Plan's Vision in terms of its scope for the PRoW networks of both East Sussex and Kent to positively contribute to Wealden District's future. In respect of Policy DE1: Achieving well designed and high-quality places, Kent County Council supports the focus on sustainable transport choices.

- A definition of Active Travel and PRow is encouraged within the glossary. The definition for Active Travel encouraged by Kent County Council can be found [here](#). Kent County Council would encourage references through the document to be amended to PRow rather than “public footpath”, to capture use of the routes by other modes, for example cycling.
- Kent County Council supports the delivery of infrastructure ahead of completion of development to ensure there is no unnecessary disruption, and measures to support changing behaviours around modal shift from the outset. Furthermore, Kent County Council supports proposals to improve existing PRow, including both local and strategic routes.

## Education

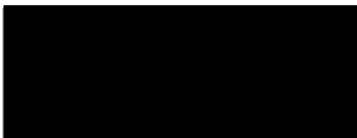
The emerging Local Plan includes 477 dwellings within Wealden but adjoining Tunbridge Wells town. For residents of these new homes, the schools within Tunbridge Wells are likely to be the nearest and it is foreseeable that the residents would apply to schools within the Kent area rather than those within the East Sussex area.

Kent County Council, as Local Education Authority for Kent, requests that the site policies for these proposed allocations include specific requirements for the education impact to be assessed and mitigation agreed with Kent County Council, if it is demonstrated that there is not sufficient capacity without additional school places within the Kent area. Kent County Council would request that this must take place prior to homes being granted planning consent and will require the County Council being provided with the full capital cost of providing the additional school places via Section 106 development contributions.

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Kent County Council would welcome continued engagement as the Local Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,

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**Stephanie Holt-Castle**  
Director – Growth and Communities