

## Salehurst and Robertsbridge Neighbourhood Development Plan

### REP/11 - Salehurst and Robertsbridge Parish Council

In its proof of evidence, Salehurst and Robertsbridge Parish Council (REP/11) drew the Inspector's attention to certain policies comprised in the Salehurst and Robertsbridge Neighbourhood Development Plan, adopted June 2018 (**SRNDP**).

This note sets out how the Order scheme complies with those policies of the SRNDP cited by REP/11.

Policy	Assessment/ Alignment
<p><b>ECONOMY</b> <b>Policy EC5</b></p> <p><i>Tourism development which includes any business activities that facilitate tourism and leisure related activities will be permitted where they:</i></p> <ol style="list-style-type: none"> <li><i>1. any new building(s) make appropriate use of materials, scale, height, form and signage; and;</i></li> <li><i>2. are in keeping with the rural character of the AONB countryside and its settlements.</i></li> </ol>	<p>The Order scheme represents "Tourism development which includes any business activities that facilitate tourism and leisure related activities".</p> <p>In addition to which, the following points are of relevance.</p> <p>There will be new buildings at Robertsbridge Junction Station, which, whilst not part of the Order scheme, will be compliant with the requirements of EC5 and, further, have been constructed in accordance with the conditions attached to the relevant planning permission(s).</p> <p>The 2019-24 High Weald AONB Management Plan notes that the '89km of historic railway line' within the AONB contributes to the area's 'Natural and cultural capital'. The proposal also strongly accords with AONB Management Objective R1 (To maintain the historic pattern and features of routeways). The East Sussex County Landscape Assessment (ESCLA) identifies 'the Kent and East Sussex Steam Railway[which] runs from Bodiam to Tenterden in Kent' as a 'Key positive Landscape Attribute'.</p> <p>More specifically, the railway embankments will be seeded with appropriate grass and planted with bushes and trees wherever possible. The authority responsible for management of the AONB has accepted that there will be no significant impact on the character of the countryside and its settlements.</p>
<p><b>ECONOMY</b> <b>Policy EC7</b></p> <p><i>Business development in the Parish will be encouraged where:</i></p> <ol style="list-style-type: none"> <li><i>1 It is in keeping with the character of the area and the amenities of neighbouring properties and minimises</i></li> </ol>	<p>RVR constitutes a "business development" in that it increases the physical extent of operation, and will generate additional visitors and economic activity to the area.</p> <p>As such, the SRNDP policy is to encourage development, subject to criteria 1, 2 and 3.</p>

<p><i>visual impact through sensitive siting and design;</i></p> <p>2        <i>It minimises the impact of the proposal on the wider character of the AONB landscape; and</i></p> <p>3        <i>It will not cause or exacerbate any severe traffic problems and will promote sustainable transport.</i></p>	<p>It is recognised within the 2019-24 High Weald AONB Management Plan that the existing historic railway contribute and define the character of the area.</p> <p>Landscape assessment work undertaken as part of the EIA states ‘<i>the railway and construction of associated features per se would not significantly adversely affect any views (including the proposed night-time lighting); in fact, where the existing vegetation is eroded / in poor health, its restoration could potentially deliver small benefits</i>’.</p> <p>The 2019-24 High Weald AONB Management Plan notes that the ‘<i>89km of historic railway line</i>’ within the AONB contributes to the area’s ‘<i>Natural and cultural capital</i>’. The proposal also strongly accords with AONB Management Objective R1 (To maintain the historic pattern and features of routeways). Landscape assessment work undertaken as part of the EIA concludes that the Scheme would not give rise to significant effects (positive or negative) on landscape character.</p> <p>There will be two traffic impacts. The first will be the level crossing impacts on Northbridge Street, Junction Road and the A21. There will be a limited amount of clearance adjacent to each crossing, where necessary, to ensure adequate lines of sight. The second will be the additional visitors who would access KESR via Robertsbridge. RVR evidence demonstrates that there are forecast to be an average of 33 additional highway trips to Robertsbridge on days when KESR operates. Our assessment suggests that these can be accommodated within the existing Robertsbridge Station car park. The impact at Robertsbridge will therefore be marginal.</p> <p>The policy is to “encourage business development” subject to 1 to 3. All development will have some degree of impact, and the assessment is whether the impact is of a scale or impact that is unacceptable.</p> <p>Based on the assessment of 1, 2 and 3, RVR concludes that the impact of development would be acceptable in terms of local area amenity (1), landscape (2) and traffic (3).</p>
<p><b>ENVIRONMENT</b></p> <p>Policy EN3</p> <p><i>All development will be considered with regard to the need to protect the landscape character of the countryside, as a whole of the Parish is within the AONB. Proposals which preserve the open character of the important gaps between settlements and which are not detrimental to the Green</i></p>	<p>The revalidation of the previous environmental work confirmed that the Order scheme could be in slight conflict with Objectives W1 (temporary), and FH1 (permanent) of the 2019-24 High Weald AONB Management Plan; otherwise, the Scheme meets all the other relevant objectives. In certain aspects, the Order scheme demonstrates a high degree of compliance with the objectives, in particular:</p> <ul style="list-style-type: none"> <li>• Objective R1: Maintain the historic pattern and features of routeways.</li> </ul>

<p><i>Infrastructure Network (as identified by RDC) will be supported.</i></p> <p><i>Development will only be permitted where it conserves or enhances the natural beauty of the Parish and has regard to the High Weald AONB Management Plan.</i></p>	<ul style="list-style-type: none"> <li>Objective OQ3: To develop and manage access to maximise opportunities for everyone to enjoy, appreciate and understand the character of the AONB while conserving its natural beauty.</li> </ul> <p>The AONB Management Plan notes that the '89km of historic railway line' within the AONB contributes to the area's 'natural and cultural capital'.</p> <p>The landscape assessment revalidation was updated following a site visit in April 2021 (the details of which form an appendix to Robert Slatcher's proof of evidence (RVR/W5/2-1). The assessment concluded that the scheme would not give rise to significant effects (positive or negative) on landscape character. The restored railway itself would not give rise to significant adverse effects on views, but there is the potential for adverse visual / sensory effects to arise from the moving steam trains.</p> <p>The Order scheme seeks to retain the network of woodland, scrub and hedgerow that runs within the rail corridor, and specifically in maintaining and enhancing habitat connectivity for dormice, ensuring contiguous habitat is present along the whole of the route. No ancient woodland will be impacted by the scheme.</p>
<p><b>ENVIRONMENT</b> <b>Policy EN4</b></p> <p><i>Development will be expected to retain well-established features of the landscape, including mature trees, species-rich hedgerows, watercourses and other ecological networks together with the habitats alongside them and ponds.</i></p>	<p>The removal of vegetation to facilitate the re-construction of the old rail line is restricted to the top of the rail embankment with the adjacent scrub and trees retained and enhanced to promote their continued utility throughout the construction period and in the long-term operational life of the railway. The ecological functioning of the habitats along the route is integral to the principles to which the ES and subsequent mitigation works have been predicated.</p>
<p><b>ENVIRONMENT</b> <b>Policy EN8</b></p> <p><i>Planning permission will not be granted where development would result in an unacceptable loss, or damage to, existing trees or woodlands or hedgerows during or as a result of development unless the benefits of the proposed development outweigh the amenity value of the trees or hedgerows in question.</i></p>	<p>Any loss of woody habitats is to be replaced at a minimum 1:1 ratio. There will not be, therefore, any unacceptable loss or damage to trees or hedgerows, and the Order scheme will comply with this policy.</p>
<p><b>INFRASTRUCTURE</b> <b>Policy IN1</b></p> <p><i>Development proposals that would result in</i></p>	<p>The RVR scheme would not result in any net loss of on or off-street parking.</p>

<p><i>the overall net loss of existing on-street and/or off-street parking will generally not be supported.</i></p>	<p>Moreover, the forecast increase in highway demand can be accommodated within the existing Robertsbridge Station car park.</p> <p>Based on this assessment, policy IN1 is not directly applicable to the RVR, based on the specific policy wording. The RVR is also consistent with the underlying principle of the policy – that development activity / demand should be commensurate with the parking available.</p>
<p><b>INFRASTRUCTURE</b> <b>Policy IN2</b></p> <p><i>New and/or improved infrastructure, including utility infrastructure, will be encouraged and supported in order to meet the identified needs of the Parish, subject to the following criteria:</i></p> <ol style="list-style-type: none"> <li><i>1. the proposal would not have significant harmful impacts on the amenities of surrounding residents and other activities;</i></li> <li><i>2. the proposal would not have significant harmful impacts on the surrounding local environment; and</i></li> <li><i>3. the proposal would not have significant impacts on the local road network.</i></li> </ol>	<ol style="list-style-type: none"> <li>The Order scheme will provide a positive impact through increasing visitor numbers to KESR and generating positive economic impacts. There would be no significant impacts on the amenities of surrounding residents and/ or other activities.</li> <li>The proposal has been subject to a statutory environmental impact assessment (EIA), the findings of which were reported in an Environmental Statement in 2014, and subsequently augmented and updated. The latest update to the original ES was submitted in 2021. The EIA has been undertaken in consultation with relevant statutory stakeholders to agree the scope and methodology applied to the assessment.</li> </ol> <p>The findings of the latest update to the EIA do not identify any significant permanent environmental effects as a consequence of the scheme on the local environment.</p> <ol style="list-style-type: none"> <li>The Order scheme will not result in a significant impact on the local road network, noting the restricted hours of operation for the A21 level crossing (and consequently reduced activity on the railway in the vicinity of that crossing, i.e. Northbridge Street), which apply in the hours typically busiest for local roads (0700 – 0900 and 1700 – 1900, Monday – Friday and Bank Holidays). The proposal will also connect KESR with the existing National Rail network at Robertsbridge providing a new way for visitors to access the heritage railway by non-car modes and thus offering a benefit to the existing road network.</li> </ol>
<p><b>LEISURE</b> <b>Policy LE3</b></p> <p><i>Proposals for new and/or improved community facilities will be supported subject to the following criteria:</i></p> <ol style="list-style-type: none"> <li><i>1. the proposal would not have significant</i></li> </ol>	<p>RVR provides a new leisure opportunity through the extension of the KESR to Robertsbridge.</p> <p>As such, the policy is supportive subject to criteria 1 to 4.</p> <p>The compliance of the Order scheme with criteria 1, 2 and 3 is described in the assessment of Policy EC7</p>

*harmful impacts on the amenities of surrounding residents and other activities;*  
*2. the proposal would not have significant harmful impacts on the surrounding local environment;*  
*3. the proposal would not have unacceptable impacts on the local road network and will actively promote access by sustainable transport; and*  
*4. the proposal would adequately address surface water run-off issues, including the installation of permeable hard standing surfaces in all cases*

(above).

With regard to criterion 4, the proposal will not generate any surface run off.

Based on the assessment of 1, 2 and 3 (see assessment under EN7) and 4, RVR concludes that the impact of development is acceptable in terms of local area amenity (1), landscape (2), traffic (3) and addressing water run-off issues (4), and the Order scheme is therefore in compliance with this policy