



## Growth, Environment & Transport

Charlotte Glancy  
C/O Banks Solutions  
80 Lavinia Way  
East Preston  
West Sussex  
BN16 1DD

Sessions House  
County Hall  
MAIDSTONE  
Kent ME14 1XQ

Phone: 03000 411683  
Ask for: Simon Jones  
Email: [Simon.Jones@kent.gov.uk](mailto:Simon.Jones@kent.gov.uk)

### BY EMAIL ONLY

31 May 2024

Dear Charlotte,

### Re: Written Statement to the Tunbridge Wells Local Plan Examination – Stage 3 Matters, Issues and Questions

Thank you for inviting Kent County Council (KCC) to submit a Written Statement to the Examination of the Tunbridge Wells Local Plan. The County Council, as **Local Highway Authority** provides the following response in respect of the Matters Issues and Questions (MIQ).

#### **Matter 2 – The Strategy for Royal Tunbridge Wells and Southborough**

##### **Issue 3 Hawkenbury Recreation Ground, Royal Tunbridge Wells – Policy AL/RTW19**

*Q2. Does the additional information in Examination Document TWLP\_092 demonstrate that a safe and suitable access can be achieved for all users and that sufficient on and off-site car parking can be provided to serve the development?*

The County Council agrees subject to the highway improvements set out in Appendix 4 of the Hawkenbury Action Plan (Appendix A).

*Q3. Does the additional information demonstrate that the site is deliverable?*

The County Council agrees subject to the highway improvements set out in Appendix 4 of the Hawkenbury Action Plan.

*Q4. What changes (if any) are necessary to Policy AL/RTW19 to ensure that the Plan is sound?*

The County Council draws attention to Appendix A of this response - Appendix 4 of the Hawkenbury Action Plan which can be found using this link:

### **Matter 3 – The Strategy for Tudeley Village**

#### **Issue 1 – Location and Accessibility**

*Q1. How does the additional information produced since the Stage 2 hearings address the Inspector's Initial Findings around the effects of the allocation on Tonbridge town centre and relevant 'hotspots' on the highway network? Could potential impacts be cost effectively mitigated to an acceptable degree and would the residual cumulative impacts be severe?*

The revised Local Plan Development Strategy no longer includes the Tudeley allocation, however additional evidence has been provided since the Stage 2 hearings in the form of the Tunbridge Wells Bus Feasibility Study (Appendix B)

The Local Plan Development Strategy includes for a Paddock Wood town bus service connecting the residential areas, both existing and proposed, with the key attractors in the town including Paddock Wood train station. This will help to achieve modal shift for local journeys but also provide easier access to the station for longer distance trips. The rail service from Paddock Wood connects to Tonbridge town centre and onwards into London.

Inter urban bus service upgrades and including a new high quality, high frequency bus service between Tonbridge, Royal Tunbridge Wells, Pembury and Paddock Wood are also included in the Development Strategy. This combined with the LCWiP will provide alternative modes of travel to the private car allowing modal shift. A Monitor and Manage Strategy is being developed which will seek to measure the effectiveness of the sustainable transport measures throughout the plan period.

A strategic transport model has been developed by Sweco. Hotspots have been identified following the modelling of the revised Development Strategy. No hotspot locations were identified in Tonbridge town centre.

*Q2. What allowance has been made for modal shift to walking, cycling and use of public transport? Is the evidence supporting the Plan justified and does it demonstrate that the allocation could be made sound?*

The Infrastructure Delivery Plan includes for a host of measures and new infrastructure to support sustainable travel and modal shift reducing the impact of the Local Plan growth on the highway network.

The removal of Tudeley Village from the Local Plan further reduces the impact of Local Plan growth on Tonbridge and this has been assessed by Sweco in their Strategic Transport Assessment work. Where hotspots are identified mitigation is proposed for delivery subject to the Monitor and Manage Strategy.

#### **Issue 2 – Five Oak Green Bypass**

Q1. *The Council's position (as set out in paragraph 3.39 of Examination Document PS\_054) is that "...the bypass would be necessary to accommodate the traffic generated by the new settlement, when developed alongside the major expansion of Paddock Wood." What evidence is there to demonstrate that the expansion of Paddock Wood would therefore remain acceptable without a bypass of Five Oak Green?*

Sweco have developed a transport model which identifies the impacts of the local plan growth on the surrounding road network. The impact on Five Oak Green and the B2017 is reported in the PS59 Local Junction Capacity Sensitivity Testing Technical Note prepared by Sweco dated 28.11.23 (Appendix C) with the following conclusions:

*"Although the data analysis shows that congestion rises along the B2017 through Five Oak Green link in the Local Plan scenario, the demand is not seen as being of a level to justify a major expansion in link capacity or a new link road such as the Five Oak Green bypass that was previously considered . However, it is recommended that consideration be given to the implementation of enhanced traffic management through the area to better support the flow of vehicles whilst also integrating this with enhanced infrastructure for people walking, wheeling and cycling in the area to enable them to safely travel along and across the link. More broadly the sustainable transport measures should be designed to maximise accessibility to Paddock Wood rail services to reduce the need for car travel on this link. The design and implementation of such measures would be expected to be linked to Travel Plans and Monitor and Manage agreements for all major Local Plan developments in the wider Paddock Wood area." (Page 7 paragraph 4)*

Whilst the B2017 is not identified as a collision hotspot and the removal of the Tudeley Village allocation from the development strategy reduces the stress on the route, KCC Highways remain concerned that the B2017 is predicted to be at full capacity in the LPMS scenario during the AM peak. It is recommended that schemes to relieve traffic pressures on the B2017 are brought forward and included in the design for the Colts Hill Bypass and the Badsell Roundabout improvement scheme. Additionally, the route should be included in the Monitor and Manage Strategy to review capacity and safety.

Q3. *Have further options been considered for the alignment of the route? Could the same transport infrastructure be provided in another way, for example?*

With the removal of the Tudeley Village allocation, the traffic demand generated by the Local Plan growth is reduced. It is recommended that the B2017 through Five Oak Green and onwards to the Sommerhill Roundabout is included in the Monitor and Manage Strategy to monitor the impact along the route in terms of highway capacity and safety.

The route of the previously proposed Five Oak Green bypass could be realigned so that its junction with the B2017 is located further east of the primary school.

Q4. *In responding to the Inspector's Initial Findings, Examination Document PS\_039 states that highway safety, noise and air quality concerns around Capel Primary School are valid and would require additional work to address them. Has this additional work been carried out?*

The B2017 in the vicinity of Capel Primary School has not been identified as a crash site, however KCC Highway Improvements Team have enhanced safety in this area by providing wig wag signals for the school and speed indicator devices in the village on the B2017.

### **Issue 3 – Wider Infrastructure Provision**

*Q2. If Tudeley Village is deleted from the Plan, what highways infrastructure would be needed in Tudeley and along the B2017 from the remaining growth proposed around Paddock Wood? Is this deliverable and viable?*

Sweco have developed a transport model which identifies the impacts of the local plan growth on the surrounding road network without the Tudeley Village allocation. The junctions each end of the B2017, namely B2017/A26/Tudeley Lane (Summerhill Roundabout) and B2017/A228/Badsell Road are identified as hotspots and highway mitigation is proposed through the Local Plan strategy.

The impact on Tudeley and the B2017 is included in PS 059 Local Junction Capacity Sensitivity Testing Technical Note prepared by Sweco dated 28.11.23 (Appendix C). This Technical Note concludes that:

*"Although the data analysis shows that congestion rises along the B2017 through Five Oak Green link in the Local Plan scenario, the demand is not seen as being of a level to justify a major expansion in link capacity or a new link road such as the Five Oak Green bypass that was previously considered. However, it is recommended that consideration be given to the implementation of enhanced traffic management through the area to better support the flow of vehicles whilst also integrating this with enhanced infrastructure for people walking, wheeling and cycling in the area to enable them to safely travel along and across the link. More broadly the sustainable transport measures should be designed to maximise accessibility to Paddock Wood rail services to reduce the need for car travel on this link. The design and implementation of such measures would be expected to be linked to Travel Plans and Monitor and Manage agreements for all major Local Plan developments in the wider Paddock Wood area." Page 7 Paragraph 4*

Whilst the B2017 is not identified as a collision hotspot and the removal of the Tudeley Village allocation from the development strategy reduces the stress on the route, KCC Highways remain concerned that the B2017 is predicted to be at full capacity in the LPMS scenario during the AM peak. It is recommended that schemes to relieve traffic pressures on the B2017 are brought forward and included in the design for the Colts Hill Bypass and the Badsell Roundabout improvement scheme. Additionally, the route should be included in the Monitor and Manage Strategy to review capacity and safety.

*Q3. Without the allocation of Tudeley Village, can the Plan deliver the necessary wider upgrades the highway network, such as the Colts Hill Bypass?*

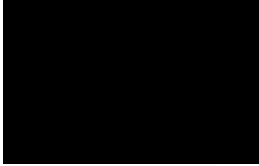
The Local Plan strategy includes for the delivery of the Colts Hill Bypass which would effectively address the capacity issues along the A228 through Colts Hill. KCC are keen to work with the Borough Council to deliver the Colts Hill bypass which has been a long term

aspiration for KCC and has historically been included in the Local Transport Plan for Kent. The delivery of such a scheme through the Local Plan is very much a positive for KCC.

---

If you require any further information or clarification on any matter raised in this letter, please do not hesitate to contact me.

Yours sincerely



**Simon Jones**

Corporate Director of Growth, Environment and Transport

Enc.

[Appendix A:](#) Appendix 4 of the Hawkenbury Action Plan

[Appendix B:](#) Tunbridge Wells Bus Feasibility Report

[Appendix C:](#) Junction Capacity Sensitivity Testing Technical Note prepared by Sweco dated 28.11.23