

Tunbridge Wells Borough Council Infrastructure Delivery Plan – August 2019

Page	Chapter	Policy / paragraph	Respondent	Commentary
23	Theme 1: Transport  Additional future requirements needed to deliver growth proposed in the Draft Local Plan	Paragraph 3.50	Highways and Transportation	<p>The paragraph aims to increase bus patronage proposing several schemes (such as a dedicated bus right turn lane at Woodsgate Corner, and the closure of Calverley Park Gardens to all traffic except for buses and access) – however these have not been fully explored.</p> <p>Also, there is no mention of Park &amp; Ride for Royal Tunbridge Wells and the surrounding areas, which could be a key tool in managing traffic growth. KCC as Local Highway Authority agrees with the ambitions of Tunbridge Wells Borough Council to maintain and enhance the rail and bus networks and services and “encourage an efficient and improved strategic public transport network and safeguard any routes that may be required in the future, in places that will cater to those who commute, and will encourage a reduction in the necessity for the private car”.</p> <p>However, the allocation of the Park &amp; Ride site at Woodsgate Corner (AL/PE 7) as car showrooms goes against the objectives of this paragraph. The proposed removal of this Park &amp; Ride site from the Local Plan effectively removes the chance of an improved direct public transport service into the town. With the levels of proposed growth to the north of this site further along the A228 corridor, the safeguarding of this well located site for Park &amp; Ride (or innovative alternative) is vital. The inability to deliver a Park &amp; Ride site could put uncertainty on the Borough Council’s ability to deliver the preferred growth strategy.</p>
26	Theme 1: Transport  Additional future requirements needed to deliver growth proposed in the Draft Local Plan	Paragraph 3.60	Highways and Transportation	<p>This paragraph refers to the North Farm Masterplan. This document will be superseded by the schemes resulting from the ongoing SWECO Local Plan Transport Evidence Base, a separate study on the North Farm area commissioned by KCC Highways and the Longfield Road business park planning application (TW/19/02267).</p>
26	Theme 1: Transport  Table 3 Transport needs for the settlements within Tunbridge Wells borough	Table 3	Highways and Transportation	<p>KCC recommends that this table should be amended to refer to <u>improvements to the public footway network and PRow network across the Borough</u>. There is also reference to schemes (i.e. bus priority, A26, North Farm Masterplan, Hawkhurst junction) that should be amended in line within comments within Appendix 1.</p>
26	Theme 1: Transport  Table 3 Transport needs for the settlements within Tunbridge Wells borough	Table 3	Highways and Transportation	<p>The IDP states: “A26 - reallocation of road space with smart traffic management to improve journey time reliability and provide infrastructure for sustainable modes (walk, cycle and bus)” KCC, as Local Highway Authority does not have confidence that this methodology will improve flows on the A26 enough to mitigate the additional traffic generated by Local Plan growth. The addition of smart traffic management (i.e. MOVA or SCOOT) to junctions that currently do not have signals in order to control the corridor will add delays that cannot be mitigated by such control systems.</p> <p>This is not acceptable and mitigation measures should be explored before the Regulation 19 consultation to provide reassurance to KCC as Local Highway Authority that the impact of growth will not result in unacceptable safety or congestion issues on the A264, A26 and other key junctions in the town.</p>
26	Theme 1: Transport  Table 3 Transport needs for the settlements within Tunbridge Wells borough	Table 3	Highways and Transportation	<p>A need for “New relief road through the Hawkhurst Golf Club site linking the A268 High Street and A229 Cranbrook Road and new junction with the existing A229 Cranbrook Road” is included within the IDP.</p> <p>The reference to the new section of road being a ‘relief’ road is misleading. It is not yet evident that the changes to the main junction proposed through the Golf Club application will be acceptable (i.e. achieve nil detriment or decrease the level of traffic/congestion/journey time through the junction thereby not causing a severe impact) for the number of dwellings proposed on the Golf Club site - not including further allocations affecting the junction: there is a presumption that the road diversion will relieve the junction significantly in order to allow more development in the village. This is not the case at the time of writing.</p> <p>Until the Golf Club application is assessed (KCC is currently awaiting more information) the cumulative impact of all allocations at Hawkhurst would be likely to cause a severe impact on the junction with no mitigation proposed. KCC as Local Highway Authority therefore objects to the allocation of these sites and any subsequent planning applications. It is recommended that Tunbridge Wells Borough Council undertakes:</p>

APPENDIX 2: KCC response: schedule of technical comments to Infrastructure Delivery Plan

				<p>a) an assessment of the cumulative impact of all proposed allocations - excluding the Golf Club - on the junction as it is currently, and</p> <p>b) an assessment of the cumulative impact of all proposed applications - including the Golf Club - with the proposed A229 diversion across the Golf Club site in place. This will assist Tunbridge Wells Borough Council and KCC Highways in understanding the impact of development in this area.</p> <p>As can be seen in Appendix 1, this has resulted in an objection to all residential allocations in Hawkhurst at this stage.</p>
79	Theme 9: Waste and Recycling Overview of existing provision	Paragraph 3.247	Waste Management	KCC would like to provide update in respect of Waste to ensure the IDP is reflecting the most recent information. This paragraph notes the unprecedented demand for KCC Waste facilities, but it needs to be clearer to explain that whilst KCC does operate “a network of 18 Household Recycling Centres (HWRCs) and six co-located Waste Transfer Stations (WTSs)” this is across the whole County and that Tunbridge Wells Borough Council is served by one combined WTS and HWRC at North Farm.
79	Theme 9: Waste and Recycling Current planned provision	Paragraph 3.248	Waste Management	This paragraph only mentions Tunbridge Wells Borough Council’s service. It should also note that Tunbridge Wells Borough Council’s new recycling and waste collection service arrangements have already put additional pressure on the KCC North Farm WTS, as further separation of waste streams and collection of food waste has required additional infrastructure to be provided, effectively reducing the operational capacity of the site.
79	Theme 9: Waste and Recycling Additional future requirements needed to deliver growth proposed in the Draft Local Plan	Paragraph 3.251	Waste Management	The following statement is the Borough Council’s view on infrastructure requirements as Waste Collection Authority– “There are unlikely to be any major short term (five years) infrastructure requirements, but potentially some over the lifetime of the Plan, such as expansion to the depot”. KCC’s infrastructure requirements as the Waste Disposal Authority are different and noted in commentary relating to paragraph 3.253.
79	Additional future requirements needed to deliver growth proposed in the Draft Local Plan	Paragraph 3.253	Waste Management	<p>KCC Waste Management has stated that as a result of additional demand generated by housing growth, this is likely to result in a requirement to build more, larger sites or invest in the maintenance or repair of existing Household Waste Recycling Centres (HWRCs) and Waste Transfer Stations (WTSs). At the Tunbridge Wells (North Farm) HWRC and WTS, KCC is expecting an increase in waste throughput especially through the Waste Transfer Station as a result of significant housing development resulting in an increase in kerbside collections. The WTS is already reaching its operational capacity, as evidenced through turnaround times for vehicles using the site. Consequently, mitigation at this site or provision of a new site to provide the required capacity is likely to be needed to deliver growth proposed in the Draft Local Plan. With regards to the HWRC provision at the site, the site operates well, although will near capacity by 2030, meaning that expansion or provision of a new or additional site is likely to be needed over the life of the Plan. The location of the site will make expansion challenging, however, minor amendments to facilitate access and flow around the site as throughput increases will be investigated in the short term.</p> <p>KCC recommends the following text is removed from paragraph 3.253 <del>“The new waste collection contract between Tunbridge Wells Borough Council and Urbaser is requiring work to be completed at the Transfer Station by KCC to allow for the increased range of materials collected kerbside”.</del></p>
81	Theme 9: Waste and Recycling Table 15 Waste and recycling needs for settlements within Tunbridge Wells borough	Table 15	Waste Management	The County Council would like to see this table amended to include WTS expansion/improvement need. It is requested that the proposed changes read: <u>“Possible expansion and improvements to the existing Waste Transfer Station and Household Waste Recycling Centre within the plan period”.</u>
85	Appendix 1: Infrastructure Delivery Schedule	Table 16	Waste Management	KCC would like to see a project to increase capacity at North Farm WTS and HWRC included in Appendix 1, Table 16 Infrastructure Delivery Schedule, under the Borough Wide heading. The County Council would be happy to provide details to complete this.
85	Appendix 1: Infrastructure Delivery Schedule	Table 16	Highways and Transportation	The distinction between ‘Critical’ and ‘Essential’ priority is unclear. Early provision of certain transport infrastructure schemes will be fundamental to providing a sustainable development with reduced reliance on the private car.