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**Growth, Environment  
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**BY EMAIL ONLY**

28 February 2024

Dear Sir / Madam,

**Re: Public Consultation on Tunbridge Wells Borough Council's Response to the Inspector's Initial Findings Letter on the Examination of the New Local Plan**

Thank you for consulting Kent County Council (the County Council) on the Tunbridge Wells Borough Council's Response to the Inspector's Initial Findings Letter on the Examination of the New Local Plan. The County Council has reviewed the consultation documents and provides the following commentary:

**PS 039 RAG Assessment - Access and Movement - Five Oak Green Bypass**

PRoW: The County Council is supportive of the references to the need for engagement in respect of the PRoW network and welcomes continued collaboration.

**PS 040 Tunbridge Wells Bus Feasibility Review – WSP dated 30 October 2023**

Highways and Transportation: The County Council, as Local Highway Authority, raises the following commentary:

- It is important to recognise that the network in Kent remains de-regulated and as such, any proposals to make fundamental changes to existing services or introduce other services that have the potential to compete with existing buses could only be implemented in conjunction with current operators. Engagement with all operators, notably Arriva, is vital before the adoption of any bus strategy.
- A Consumer Price Index (CPI) figure of 2.5% has been used to forecast cost increases but industry inflation is currently far in excess of this. It is considered that

a more robust assessment would include for 10% in the early part of the forecast profile.

- It is recommended that the intensification of the Paddock Wood to Royal Tunbridge Wells service could be phased so that the frequency increases as the development is built out.
- It is recommended that data from Arriva would be helpful to help inform and discount some options presented.
- It is noted that early engagement took place with Arriva and further engagement could take place once the options are shortlisted using the operators' data. Once the data is received, a separate section could be provided for operators.

### **PS 041 Paddock Wood Bus Service Options – WSP Technical Note dated 30 October 2023**

Highways and Transportation: The County Council, as Local Highway Authority, raises the following commentary:

- Instead of routing the buses along Church Road/Queen Street/Mascalls Court Road, the County Council questions if the bus could be routed from the northern development site through the southern Persimmon development site where a 6.75m wide boulevard is proposed.
- Enhancements to bus stops on Station Road could be considered as an alternative to routing the bus through the station car park.
- The basic service routing and network pattern appears sound and it is the right approach subject to funding and understanding of how costs would align and be covered by proportionate contributions from applicants.
- Costs appear to relate to around £500 per vehicle per day which is considered to be light for what is proposed as an all-day operation.
- Mode share at 5% is the absolute maximum that could be expected given that there is no perception that the network would benefit from significant bus priority or other features that would support a higher assumption of usage.
- In terms of service coverage, when accounting for the commuter market, the County Council considers that a 0600 – 2000 service pattern might be appropriate.
- The benefits of Demand Responsive Transport (DRT) in this context are not fully understood and the County Council has doubts about being a more affordable alternative to the conventional bus particularly where DRT is proposed to operate in between timetabled services.

- If a reduced off peak service level is considered appropriate - the County Council considers that a better use for the second vehicle at these times maybe for an alternative bus service for the outlying areas, possibly absorbing existing subsidised services and off-setting cost.

**PS 046 Paddock-Wood Strategic Sites Master Planning and Infrastructure Study – Paddock Wood Growth Follow-on Study - David Lock Associates October 2023**

Highways and Transportation: The County Council, as Local Highway Authority, raises the following commentary:

- Table 8 'Infrastructure' lists new infrastructure and whether it is required in either the short term or medium term. The evidence to support this is required by the County Council.
- Table 8 includes for traffic signals on the B2160 Maidstone Road to allow one-way shuttle working over the railway bridge. This proposal has not been modelled in detail and is the only north/south link for local traffic in Paddock Wood Town Centre. Without supporting evidence this proposal is not supported by the County Council, as Local Highway Authority.
- The sustainable transport proposals listed on page 31 of the Master Planning Addendum includes 'Pedestrian and cycle improvements – Stantec assumed upgrades and PJA presentation' - clarification is required by the County Council of the detail of what is proposed.
- It is noted that 3m shared cycleway/footways are proposed, however, LTN1/20 compliant segregated facilities are required.
- The County Council recommends that the proposed pedestrian/cycle bridge across the railway line should also accommodate buses.

PRoW: The County Council requests consideration of the PRoW network and positive engagement with the County Council in respect of PRoW.

Development Investment: In respect of part 3.5, the County Council welcomes the third bullet point on the safeguarding of a site in NW (North West) Paddock Wood for future 6FE secondary need.

Clarification is requested in respect of part 3.19 as to whether the proposed 7.6 ha site is to accommodate 6<sup>th</sup> form.

In respect of part 3.9, the County Council's interest is in the land being provided in good condition; a level site free of encumbrances and in line with all aspects of its latest General Land Transfer Terms. Whichever location is decided upon, it must ensure access to good transport links to promote sustainability.

The County Council welcomes the narrative that proposes Option 2 (part 3.10) (the NW of Paddock Wood) - which is the more travel sustainable site as long as infrastructure required for genuine active travel is appropriately Implemented. There is an opportunity here to deliver high quality infrastructure to meet sustainability targets.

Part 3.13 refers to the school site layout and seems to allude to buildings proposed on one side of a watercourse and playing fields on the other, possibly suggesting a split school site. A split school site is rarely usually supported by either an academy trust or the County Council, and it is suggested that the Borough Council should avoid a scenario where access between buildings and playing fields is part of the split. Split school sites traditionally reduce the level of interest from academy trusts to operate them, and create greater levels of both short and long term costs for a school operator relating to staffing, maintenance and security.

Part 4.6, the Infrastructure Schedule Table 8 references Education - 4FE Contribution towards new secondary school (on-site) – however, it does not appear to be consistent with 2.21 (Page 7) where the County Council evidence from revised capacity and updated forecasts confirms a need for 3 FE.

The County Council also notes there is no mention of waste infrastructure requirements. There is an ongoing need to seek contributions to fund a Waste Transfer Station and Household Waste Recycling Centre Facilities upgrades and renewals, principally and currently at the North Farm Depot.

Similarly, the County Council notes that there is no reference within this table to require ongoing funding support through s106 planning obligations for libraries, community learning and skills (adult education) and integrated children's services. The County Council would ask that this addressed. Furthermore, the mention of Primary Care contribution on page 33 of the table is vague and the County Council would ask that this is clarified.

**PS 046a Figure 5 Structure Plan for Paddock Wood – Drawing TWBC04 – 008 rev C titled Framework Plan - David Lock Associates 26 March 2023**

Highways and Transportation: The Structure Plan drawing numbered TWBC04-008 Rev C illustrates the access and movement proposals for Paddock Wood. The County Council requests that that following points are addressed:

- The number of new homes in each development area should be annotated so that the access proposals can be checked against the requirements of the Kent Design Guide. The diagram indicates each of the strategic sites is served by a single access suitable for all vehicles, however, the Kent Design Guide requires two separate accesses to serve sites of over 300 dwellings.
- It would also be helpful if the access and movement linkages outside of the proposed development areas are shown to demonstrate how the proposed roads, bus routes, cycleways and footways link with existing infrastructure and where improvements may be needed.

- Areas where existing infrastructure improvements are needed and where new infrastructure is to be provided should also be shown.

**PS 46c Infrastructure Provision for Paddock Wood – Drawing TWBC04-011 rev C titled Infrastructure Plan – David Lock Associates dated 26.10.2023.**

Highways and Transportation: The Infrastructure Plan numbered TWBC04-011 Rev C provides a high-level diagram of the proposed links for active travel and buses to/from the new developments plus locations where off-site highway works are proposed. The County Council requests the following additional information and considerations:

- It would be helpful if the links outside of the proposed development areas are shown to ensure it is clear how the proposed bus routes, cycleways and footways link with existing infrastructure and where improvements may be needed.
- It is noted that a pedestrian/cycle route is proposed from the northwest segment and crosses the A228. An 'at grade' crossing at this location, which is subject to the national speed limit, is likely to lead to highway safety issues and further information is required to evidence how a safe and suitable crossing can be delivered.
- The proposed new pedestrian/cycle bridge across the railway line should also accommodate buses.
- The Infrastructure Plan includes traffic signals on the B2160 Maidstone Road to allow one-way shuttle working over the railway bridge. This proposal has not been modelled in detail and is the only north/south link for local traffic in Paddock Wood Town Centre. Without supporting evidence this proposal is not supported by the County Council, as Local Highway Authority.
- Footway and cycle links are required between the southeastern development parcel and the land safeguarded for an extension to Mascalls School.

**PS 047 TW-Stage-1-Technical-Note-Review-of-Strategic-Model-Methodology-and-Set-Up-for-Local-Plan.pdf (tunbridgewells.gov.uk) Sweco dated 17.8.23.**

Highways and Transportation: The County Council, as Local Highway Authority, raises the following commentary:

- The methodology and background assumptions to the 2018 base model remain sound and are considered suitable for use in the updated modelling work.
- Review of more traffic data shows there is a reasonable correlation with data used in the original model.

- The continued use of the National Trip End Model (NTEM) Version 7.2 to provide background growth is accepted as providing a robust assessment due to the higher population and household numbers and resulting demand for travel compared to NTEM version 8, in addition to providing a sensitivity test using version 8.
- The table of committed highway schemes at Table 3 (5.1) is agreed as in line with current approvals.
- A review of modelled flows at A21 Kipping's Cross compared to observed flows confirms the model validates well at this location.
- The residential trip rates set out in Table 13 are agreed as acceptable for generic Local Plan assessment purposes.

### **PS 048 Stage 2 Reporting – Sweco 18.8.23**

Highways and Transportation: The County Council, as Local Highway Authority, raises the following commentary:

- A sensitivity test comparing NTEM Version 7.2 and 8 concludes that the total trips and location of 'hotspot' junction arms are very similar, and this testing should be reviewed.
- Hotspot junctions are defined as junction arms with over 95% volume to capacity. The County Council considers 95% a high bar for junction capacity. Industry standards are that junctions reach capacity and become unstable at 85% and 90% for signals. An explanation is requested as to the rationale for this higher threshold before mitigation is considered.
- Of those hotspot junctions 'Minor LP Hotspots', there are those where at least 50 additional vehicles pass through as a result of the Local Plan. Clarity is requested as to over what time period this is within. It is considered that the assessment should also include additional queues and delays arising from the Local Plan.
- The potential mitigations shown do not appear to include the A228 dumbbell roundabout junctions with the A21 which are a significant congestion hotspot which need mitigating to provide an attractive route to the A21 for journeys from the Paddock Wood development sites. This must be reviewed.
- This stage 2 reporting should include an assessment of crash data to understand potential highway safety issues which may be increased with additional Local Plan trips. This must be addressed.

### **PS 049 Stage 3 Modal Shift Impact Reporting – Sweco 22.9.23**

Highways and Transportation: The County Council, as Local Highway Authority, raises the following commentary:

- Comments made within this response on PS 048 Stage 2 Reporting and PS 053 TWBC Sustainable Transport Note should also be considered in respect of this document.
- A comparable highway safety analysis is required using the current crash data and considering where increases in flow may lead to increased risk.
- The note defines both high and low mode shift scenarios. To give confidence that these mode shift scenarios can be achieved, mitigations should be based on experience of good practice. They will need to be deliverable including within highway land or with the agreement of third parties if needed, with sufficient funding and subject to consultation should the County Council be required to deliver them.
- A Monitor and Manage approach should be followed whereby the type, location and extent of schemes can be flexed over time subject to progress with targets.

### **PS 050 RAG Assessment - Access and Movement - Colts Hill Bypass**

PRoW: The County Council requests that engagement in respect of PRoW is forthcoming given the impact of the proposal on the network and the surrounding area, including Public Footpath WT198 which is directly impacted and potentially severed.

### **PS 053 Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling - TWBC November 2023**

Highways and Transportation: The County Council, as Local Highway Authority, raises the following commentary:

- It should be noted that contrary to paragraph 3.3, the reference case does not include for Local Plan development trips and therefore there is no reduction in trip rates for sustainable travel in this scenario, either in the previous TAA2 or the revised reference case.
- With reference to Appendix 1 Draft revisions to the Infrastructure Delivery Plan (IDP) in respect of sustainable transport measures, the County Council questions how the contribution amounts been calculated, and whether they include inflation and increased construction costs which have risen since the previous IDP was compiled.
- A26 cycleway funding includes for Department for Transport funding which is not available. This must be corrected.

- A scheme is included allowing £500,000 for bus priority measures along the A264 Pembury Road from Woodgate Corner to Oakley School towards Royal Tunbridge Wells (RTW). The scheme description requires amendment in order to allow more flexibility. The County Council would suggest 'bus journey time improvements along the A264 Pembury Road between Woodgate Corner and RTW centre.'
- A scheme is included for a bus only route along Calverley Park Gardens, except for cycles and pedestrians. It is requested that the description is amended to allow more flexibility given that any such scheme will require consultation. The County Council would suggest 'measures to improve bus journey times along Calverley Park Gardens'.

### **PS 054 Local Plan Development Strategy Topic Paper – Addendum – TWBC January 2024**

Highways and Transportation: The County Council, as Local Highway Authority, raises the following request for inclusion within the Masterplanning requirements:

- Links to schools should be included within the following policy requirement: 'Provide walking and cycling linkages within the site connecting to adjacent development parcels, ... **schools** and surrounding countryside in accordance with policy TP 2'.

Education: The removal of the proposed garden village has reduced the forecast demand for additional secondary school places. It also means that the proposed site for a new secondary school within the garden community is no longer available. The revised proposals outline two approaches to securing sufficient provision for the remaining developments; the establishment of a new school or the expansion of the existing Mascalls Academy. The necessary principle of ensuring sufficient provision and contributing to socially sustainable development is achieved through both options, however, there are considerations under both options.

The proposed sites for a new secondary school may have some development challenges and whilst these are likely to be overcome, they may place abnormal design considerations onto the delivery of a school, such as mitigating flood risk. Therefore, should this option proceed, it is important that the Local Plan fully secures the additional cost associated with mitigating the design and planning challenges. The land for a new school must be transferred to the County Council at nil net cost and in line with the County Council's standard transfer terms.

The expansion of the existing Mascalls Academy by 3FE would make it one of the largest secondary schools in the county. This will bring additional challenges; operationally, physically and educationally. It will be important that any proposed expansion of this scale is appropriately designed with detailed consideration of highways and access. The Trust who



operates the school needs to be confident that a strategy for operating such a large school is feasible. It will be essential for the County Council to be involved in this.

Parts 4.45-4.49 consider a strategy of providing additional secondary capacity in existing schools outside of the Borough, particular in Tonbridge and Malling. The commentary concludes that this is unlikely to be favourable or achievable and that either the expansion of Mascalls or the establishment of a new school will be required. The County Council concurs with this conclusion.

### **PS 058 Tunbridge Wells Bus Feasibility Technical Note WSP July 2022**

Highways and Transportation: The County Council draws attention to commentary made in respect of PS\_40 and PS\_41 relating to bus studies.

### **PS 059 Tunbridge Wells Local Plan Stage 3 Part 2 Outcomes – Local Capacity Sensitivity Testing Technical Note – Sweco 28.11.23**

The County Council provided comments to TWBC on 14 December 2023 (Appendix A) which remain relevant to this consultation.

### **PS 060 Paddock Wood and east Capel Access and Movement Report – Stantec November 2023**

Highways and Transportation: The County Council, as Local Highway Authority, raises the following commentary:

- Appendix B includes Drawing Number 332410964 rev PO1 titled Colts Hill Bypass Alternative Highway Connections. The County Council, as Local Highway Authority, requires a RSA1 with capacity assessments, geometry details, any departures from standards and technical review to add confidence to the feasibility and deliverability of the scheme.

PRoW: The County Council draws attention to the need for an off road route for walking and cycling to be prioritised to connect the two sites.

### **PS 061a Addendum to Local Plan Viability Assessment Main Report**

Development Investment: The County Council notes within paragraph 2.1.18 that Dixon Searle Partnership (DSP) references a benchmark land value for Local Plan land as £250k/Ha. This would appear to be an agricultural land value. This is acceptable as long as the County Council is provided land for educational expansion requirements at nil cost. The County Council would also request consideration of ensuring that neighbouring landowners / developers are equalising on land so that the County Council is provided land appropriately and efficiently.

**PS 61b Appendix I – Development Appraisal Assumptions Overview – Tables 1 and 1a - Addendum to Local Plan Viability Assessment Appendix 1: Paddock Wood & East Capel Assumptions - DixonSearle Partnership - December 2023**

Highways and Transportation: The County Council, as Local Highway Authority, notes that the infrastructure listed in Table 1A does not include improvements to the junctions of the A21/B2160 at Kippings Cross, A21/A228 and A21/A264 dumbbell roundabouts or A26/B2017 Woodgate Way Roundabout. Clarity is requested as to whether the Compulsory Purchase Order costs are included.

**PS 063 Summary of Proposed Modifications to the Development Strategy, following Inspector’s Initial Findings in November 2022**

*SLP Mod 9 - STR/SS 1: The Strategy for Paddock Wood, including land at east Capel*

Development Investment: The County Council welcomes the reference to community and educational facilities within part b.

The County Council also welcomes the reference to development proposals being required to be supported by planning obligations to enable infrastructure such as highways mitigation works, education facilities and other necessary infrastructure within paragraph e.

Education: In respect of paragraph h, the County Council reiterates that its preference, aside from the eventual findings of the feasibility study, is for the development of a 4 FE secondary school to accommodate the 3FE uplift in school places, but with opportunity to expand from 4FE to 6 FE.

Public Rights of Way (PRoW): The County Council that the reference to “existing bridleway network” is replaced with ‘**existing Public Rights of Way Network**’ which therefore encompasses all PROW not just Bridleways.

Furthermore, with reference to strategic infrastructure, reference should be made to the PRoW network when considering part d, regarding transport and highways.

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, accepts the modifications, including SLP Mod 9. This support is provided given policies EN24, EN25 and EN26 provide additional protection and security with regards to the design of SUDS drainage systems and the requirement for betterment in relation to where development is proposed in areas with known existing flood issues.

*Policy SS/STR 1(A) – North Western Parcel Requirements*

Education: The County Council is supportive of the following statements:

*“iv. A two-form entry primary school, safeguarded to enable expansion to three form entry”;*

*“vii. Safeguarding of land for 4FE secondary school that has land available to expand to 6FE should it be required”;*

*Policy SS/STR 1(D) – North Eastern Parcel Requirements*

Education: The County Council is supportive of the following statement:

*“iii. Land for a two-form entry primary school”*

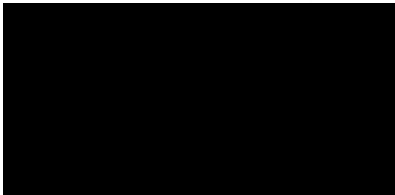
*SLP Mod 12 (Page 82) - Policy AL/HA 5: Land to the north of Birchfield Grove*

Development Investment: The County Council welcomes the following inclusion:  
*“Contributions are to be provided to mitigate the impact of the development, in accordance with Policy STR/HA 1.”*

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The 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,



**Simon Jones**  
Corporate Director – Growth, Environment and Transport

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Appendix A: PS 059 Tunbridge Wells Local Plan Stage 3 Part 2 Outcomes – Local Capacity Sensitivity Testing Technical Note – Sweco 28.11.23 – commentary provided by the Local Highway Authority on 14 December 2023.