

Tunbridge Wells Borough Local Plan Examination

Matter 6 – Strategic Sites

Tonbridge & Malling Borough Council's Statement

Issue 1 – Tudeley Village

Q.11: How will the phasing of development be controlled and is it clear to users of the Plan what new infrastructure will come forward and when? Is it necessary for such information to be contained in the Plan?

Tonbridge & Malling Borough Council's (TMBC's) Response to Q11:

1. TMBC express serious concerns about the phasing of development and the impact this is likely to have on local communities, infrastructure and the environment in Tonbridge & Malling Borough.
2. Given the scale of this strategic site and the range of matters that need to be planned for including schools, active travel, highways etc, as well as housing, it is necessary for such information to be contained in the Plan.
3. At present, policy STR/SS 3 is lacking details, including key phasing milestones such as when highways improvements need to be in place and the schools opened and how these relate to the number of homes built. The Plan is lacking a clear trajectory for the site and how it and the supporting infrastructure will be brought forward alongside each other.
4. We understand that there is a commitment to prepare a Framework Masterplan Supplementary Planning Document (SPD) which will address a lot of the details about how the development will take place. However, this SPD does need clear policy hooks in the Local Plan to hang-off and address, including phasing. Furthermore, the SPD will not form part of the development plan (Local Plan) which means it will enjoy less weight in decision-taking. These important details on phasing cannot afford to be relegated to a document of this status.
5. It would be reasonable and proportionate for the policy and Plan to set out the high-level phasing so that surrounding communities, including those in Tonbridge & Malling can better understand how the development will be brought forward.

6. The absence of this detail concerns TMBC because it makes it very challenging to understand how, over time, our local environments, infrastructure and communities will be impacted. Given that this is a strategic site that will take many years to be developed, we, and the communities we represent, are naturally worried about how we will be impacted. An example of our concern is highlighted in our representation at the Regulation 19 stage of plan-making where we have questioned the proposed closure of Hartlake Road because of what this might mean for north and southbound traffic from the development and where it will be displaced too.
7. The lack of clarity on phasing, and the uncertainty this generates in terms of short, medium and long-term impacts is one of the reasons why TMBC considers the policy in the submitted Plan to be unsound and why we, and the communities we represent, strongly object to the strategic allocation at Tudeley.

Q14: Are the projections regarding future transport patterns reliable and are the conclusions robust? Do they justify the proposed allocation Tudeley?

TMBC's Response to Q14:

8. TMBC express serious concerns about the transport evidence and, therefore, the future transport patterns and what this means for infrastructure, local communities and the environment in Tonbridge & Malling Borough.
9. The extent of the modelling area is too narrowly drawn, particularly to the north. Given the scale of development proposed at Tudeley Village and Paddock Wood, which could potentially deliver in excess of 6,300 homes, the extent of the transport modelling needs to be wider, to understand better the impacts.
10. The northern extent should have included the settlement of Hadlow on the A26. In addition, junctions further north including the A26/A228 (Seven Mile Lane), the A26/A228 (east of Mereworth) and the junctions along the A228 up to the junction with the M20 motorway (junction 4) should have been modelled. These should have fallen within the scope of the transport modelling because the A228 is a significant north-south highway corridor providing links (directly and indirectly) to the large urban areas of Maidstone, the Medway Gap and the Medway Towns as well as the strategic highway network (M20 and the M2) linking to London and the Channel ports. The significance of this transport corridor is reflected in Figure 9-3 in the Transport Assessment [CD3.114] which highlights that 500 trips a day between Paddock Wood and Tudeley Village to Maidstone & Medway are anticipated.
11. While it is recognised that car background growth factors across the entire modelling area were derived from TEMPro, the fact that the extent of the modelling area has been too narrowly drawn means that insufficient committed development has been factored in. This includes committed development along the A26 and A228 with Tonbridge & Malling borough (see above). This means that we do not have a true understanding of the impacts, especially on junctions at and near to Tonbridge, Hadlow and further north along the A26 and A228 corridors.
12. It is appreciated that at the time the transport modelling was undertaken, TMBC did not have in place an up-to-date Local Plan. However, the Plan submitted for examination indicated TMBC's intentions for the distribution and scale of development across our borough and, unsurprisingly, sites were allocated at and around Tonbridge, our principal town at the top of the settlement hierarchy. It is naïve to assume that during the lifetime of the Tunbridge Wells Local Plan, there

will not be any planned growth, in addition to existing commitments, at and around Tonbridge. However, this is what has happened with the transport modelling.

13. Not only are we concerned about the extent of the transport modelling area, and how this is likely to under-estimate the projections regarding future transport patterns, but we are also concerned about the conclusion in the Transport Assessment [CD 3.114] that further mitigation beyond existing proposals in the Local Plan is still needed for 15 junctions to relieve additional congestion. This includes the junction of A26 Woodgate Way/B2017 Tudeley Road/Tudeley Lane which is an essential part of the highway network in Tonbridge given its proximity to the town, even though it technically falls within Tunbridge Wells Borough. We have noted that this is identified as critical and costed in the Infrastructure Delivery Plan [3.71]. The Transport Assessment Evidence Modelling Report [CD 3.114] highlights that this mitigation measure requires an additional £500,000 to what is costed as part of the masterplan studies. It is not clear if the outputs from CD3.114 are reflected in the Infrastructure Delivery Plan because both documents were published in March 2021. Furthermore, the policy in the submitted Plan for the strategic site at Tudeley (STR/SS 3) makes no specific reference to this expanded project. Given that this mitigation is identified as critical and should be delivered in the short-medium term, it must feature as one of the key highway improvements in the policy.
14. Our concerns about the transport evidence also extend to the air quality evidence because the two are closely related. A negative consequence of a narrowly drawn modelling area for the transport evidence is that the impacts on air quality of the development and associated traffic may be under-estimated. This brings into question the robustness of the current air quality evidence which is limited to a Topic Paper [ref: 3.106]. A Topic Paper on the important matter of air quality is considered insufficient.
15. Given our serious concerns, TMBC believes that the current transport modelling and its outputs do not justify the proposed allocation at Tudeley which is one of the reasons why we, and the communities we represent, strongly object to the strategic allocation at Tudeley.

Q15: How will connectivity with Tonbridge be provided for non-car modes of transport?

TMBC's Response to Q15:

16. TMBC have concerns over the strength of the evidence supporting a potential modal shift of 10% from the car to active travel modes, especially on routes to Tonbridge.
17. While we welcome projects such as a part segregated cycle route between Paddock Wood town – Tudeley Village – Tonbridge town, as highlighted in the Infrastructure Delivery Plan [ref: 3.71] and the Local Cycling and Walking Infrastructure Plan: Phase 2 [ref: 3.115b(i)], the Local Plan lacks details on how this could be realistically achieved and by when and how this would relate to the phasing of development. It is unreasonable to expect all this detail to feature in the SPD, there needs to be clarity and certainty within the relevant policies in the Local Plan. We are mindful that large stretches of this project would be on routes in our borough and that we are at the early stages of consulting on proposed cycle routes as part of our emerging Active Travel Strategy. It is too early to say what will be carried forward in Tonbridge & Malling Borough which means there is uncertainty over the deliverability of this particular project, especially the stretch to Tonbridge station which is the primary destination.
18. We support the proposed project of an improved bus service between Paddock Wood – Tudeley – Tonbridge, as highlighted in the Infrastructure Delivery Plan, although this is not clearly captured in Policy STR/SS 3 which brings into doubt the deliverability of this specific project as part of the strategic site development.
19. We are disappointed by the response from Network Rail that the scale of development planned for in Tunbridge Wells, particularly in the vicinity of Tonbridge and Malling Borough, does not require specific rail capacity interventions. With this response in mind, we question the validity of the statement in para. 5.221 of the submitted Local Plan that the “development provides an opportunity for a new railway station to be delivered on the site to provide rail linkages to London on the Ashford/Dover line (linking to Tonbridge and Paddock Wood”. Given that the body responsible for the provision of railway infrastructure has stated that there is no justification for additional capacity, this is, unfortunately, an unrealistic statement, with no chance of delivery during the Plan period.
20. Not only are we disappointed about the lack of planned improvements to the railway infrastructure but we are concerned about what this will mean for the

highways and, as a consequence, the environment in Tonbridge. In the absence of a new railway station/halt at Tudeley, Tonbridge station will be one of the principal destinations for daily commuters. The concern is the impact of the volume of commuters choosing to drive to Tonbridge station from the Tudeley Village development and what this will mean for the functioning of the highway network in and around the town and the consequential harmful impacts on air quality for people living and working in Tonbridge. We have noted the proposals for active travel solutions between the development and Tonbridge and new and improved bus services but the success and viability of these is dependent upon a willingness of regular commuters to leave their cars at homes. This is based on good will and a firm commitment which cannot be relied upon, especially during inclement weather.

21. Our doubts over the effective achievement of connectivity between the development at Tudeley and Tonbridge for non-car modes of transport is one of the reasons why TMBC considers the policy to be unsound and why we, and the communities we represent, strongly object to the strategic allocation at Tudeley.

Q19: Is the evidence supporting the Plan reliable and robust? Does it take into account the indicative location of the proposed secondary school?

TMBC's Response to Q19:

22. As highlighted by TMBC's responses to questions 11, 14 and 15 (see above), we have serious concerns about the robustness of the evidence. The most significant concerns relate to the transport modelling, which does not fully understand the wider impacts on communities, junctions and the environment in Tonbridge & Malling. Related to this is the evidence on air quality which, as a consequence of the limited coverage of the transport modelling, may be under-estimating the impacts. We are concerned that the Local Plan is not supported by substantial air quality evidence, with this matter only being addressed by a Topic Paper [ref: 3.106].
23. In addition, TMBC express concerns about the evidence on landscape impact and flooding.
24. The submitted Local Plan, at para. 5.208, recognises that the northern boundary of the High Weald Area of Outstanding Natural Beauty (AONB) abuts the southern and south-eastern boundary of the proposed strategic site at Tudeley. Given the scale of the development proposed (circa. 2,800 units) and the fact that the National Planning Policy Framework (July 2021) requires development within the setting of AONBs to be sensitively located and designed to avoid or minimise adverse impacts on the designated areas, it is reasonable to expect robust evidence to assess potential landscape impacts of the development on the AONB. However, that is not the case. The Tunbridge Wells Landscape and Visual Impact Assessment [ref: 3.96a – 3.96i] is only focussed on the proposed allocation sites within the High Weald AONB. This does not sufficiently respond to national planning policy. It is inadequate and therefore not robust.
25. We are mindful that areas to the north of the proposed strategic site have been subject to significant flood events, as identified in the Strategic Flood Risk Assessment (SFRA) (Level 1 and 2 combined, 2019) [ref: 3.105a-b]. The submitted Local Plan recognises at para. 5.210 that a small parcel of land to the north of the site is located in Flood Zone 2. The SFRA also identifies that susceptibility of groundwater flooding is greatest in areas including Tudeley Hale, north of the strategic site. The evidence base is lacking data and other information on if and how the strategic site might impact on the risk of flooding in the areas and communities to the north. Most of the flood risk analysis is focussed on Paddock Wood.

26. We have noted the requirements of criterion 10 in Policy STR/SS 3 for a drainage strategy demonstrating that the development will not exacerbate flooding elsewhere in the vicinity. This indicates that this must be an issue. However, we are unable to find sufficient evidence to size-up the issue and the potential impact of the development of Tudeley Village on flood risk, particularly surface water flood risk, for those areas and communities to the north of the strategic site.
27. The evidence base is lacking details on the secondary school provision. The Infrastructure Delivery Plan (ref: 3.71) identifies the need for a six form-entry secondary school but it does not identify when this should be delivered, in terms of dates and the number of units completed at Tudeley Village and at and around Paddock and east of Capel. The Strategic Sites Masterplanning and Infrastructure Main Report [ref: 3.66] indicates that shared off-site infrastructure, such as the secondary school will be phased in the long-term, beyond 2032.
28. While we welcome the relocation of the secondary school site from the west to the south-east of the masterplan area for Tudeley Village, the lack of detail about phasing of the development of the school alongside the developments at Tudeley and Paddock Wood, which it will also serve, concerns TMBC. We are mindful that Tonbridge town centre includes several secondary schools which will be impacted, especially if the new secondary school is not phased for completion until later in the development of Tudeley Village. We are concerned about the potential traffic impacts in the short to medium term of children travelling to and from the schools in Tonbridge from the new developments, and what this will mean for air quality and pedestrian safety. We are also concerned about the impacts on families with school-aged children living in and near to Tonbridge who may have limited options, in the short to medium term before the new secondary school is provided, for sending their children to schools local to them.
29. The Local Plan needs to provide a clear, more detailed trajectory for the development of Tudeley Village, including the supporting infrastructure. It is not reasonable for this detail to be relegated to the SPD. The SPD will not form part of the development plan (Local Plan) which means it will carry less weight in decision-taking.
30. Our concerns about the robustness and reliability of the evidence base is one of the reasons why TMBC considers the policy in the submitted Plan to be unsound and why we, and the communities we represent, strongly object to the strategic allocation at Tudeley.

Q.20: Is it clear to decision-makers, developers and local communities what infrastructure will be delivered, by whom and when?

TMBC's Response to Q20:

31. TMBC considers that the Local Plan, in particular policy STR/SS 3, is unclear about the phasing of the development. Our detailed concerns are spelt out in our responses to matter 6, issue 1, questions 11 and 19 (see above), which focus on the phasing of supporting infrastructure such as new education provision alongside the development.
32. It is reasonable to expect the Local Plan to include a trajectory for the development of Tudeley Village, highlighting how it will be brought forward, year by year, with milestones for the delivery of supporting infrastructure such as schools, highways improvements and local centres. This detail is lacking in the submitted Plan. It is also lacking in the Infrastructure Delivery Plan, which is vague, especially in respect of how the delivery of new education provision will come forward alongside the number of homes built at the strategic sites at Tudeley and Paddock Wood east of Capel.
33. We understand that the masterplanning work has identified broad phasing (short, medium and long-term) but this document does not form part of the development plan (Local Plan). It is unreasonable to relegate such important planning information for the delivery of the strategic site to supporting documents and the SPD. These do not form part of the development plan (Local Plan) and will, therefore, carry less weight in decision-taking.
34. Having a clear understanding of the phasing of development and how and when supporting infrastructure is expected to come on-line is not only vital for good place-making but essential for neighbouring communities, such as those living in Tonbridge & Malling Borough, to understand better if, when and how long they are likely to be impacted. This uncertainty and the lack of detail in the Local Plan and evidence base means that the policy for this strategic site is unsound and why we, and the communities we represent, strongly object to the allocation at Tudeley.