

Tunbridge Wells Borough Local Plan Examination

Hearing Statement prepared on behalf of Hadlow Estate

Matter 7 – Highways Infrastructure

Issue 1 – Strategic and Local Road Networks

Q1. Without the proposed bypass, what effect will the suggested changes to the Plan have on the B2017 through Five Oak Green? What mitigation measures will be necessary in this location and how will they be achieved?

Please refer to the response provided with respect to Matter 4, Issue 4, Q1 which addresses this question.

Q2. What effect will the suggested changes to the Plan have at Kippings Cross (A21/B2160)? Do the conclusions and recommendations in the Kippings Cross Junction – Local Plan Mitigation Option Analysis⁹ remain relevant?

Some further information has been provided concerning the effect of the changes to the Plan on the Kippings Cross roundabout in the Council’s Matter 3 hearing statement, Appendix 1¹.

This highlights two potential mitigation options:

- A modified roundabout arrangement to achieve a left turn bypass from the A21 to the B2160 and associated entry widenings on several of the remaining arms; and
- Full roundabout signalisation.

However, both options would incur significant costs and require substantial land take. Therefore, it is understood that an alternative mitigation option is being considered which focuses improvements on the A228 corridor, from the A28 Pembury Road / Tonbridge Road signals to the A264 Pembury Road / Sandhurst Lane junction. The aim of these measures would be to route vehicles away from Kippings Cross, alleviating pressure at this junction. However, no designs are yet available for this alternative capacity improvement and it is unclear what improvements can be feasibly achieved.

Based on the evidence presented, it appears that the original findings in the Kippings Cross mitigation option analysis² are no longer relevant.

However, the new evidence to support a revised approach is at an early stage and further work is required to address the capacity concerns at Kippings Cross. This is required to ensure an effective and deliverable scheme can be provided, which can address the planned growth; at present, the necessary evidence base does not exist and what has been provided is not sufficiently robust or justified.

It is unclear whether further evidence will be forthcoming in advance of the Matter 7 hearings concerning this issue. The Hadlow Estate reserve the right to comment further at the hearings should further information be presented and in response to any further evidence the Council may produce at that time.

Without prejudice to the points above, given that it would be necessary to provide further information on this proposal, it is clear and obvious (if consistency of approach is to be applied) that to the extent that any further information is considered to be necessary for the proposals for Tudeley Garden Village (TGV), these can and should be provided in the same timescales.

¹ TWLP_123 Appendix 1 SWECO Strategic Transport Assessment (April 2024)

² PS_033 Kippings Cross Junction – Local Plan Mitigation Option Analysis (June 2022)

Q3. What effect will the proposed changes to the Plan and distribution of growth have on the remaining “hotspots” identified in the evidence base? Will there be any unacceptable impacts on highway safety or will the residual cumulative impacts on the road network be severe as a result of the Plan?

Within Appendix 1 of the Council’s Matter 3 hearing statement³, the revised modelling indicates that hotspots remain within the vicinity of Paddock Wood and on the B2017 corridor as a result of the main modifications. The junctions identified as ‘Major’ hotspots are:

- **Junction 8** – A26 / B2017 Tudeley Road roundabout (Somerhill Roundabout)
- **Junction 12** – A228 / B2160 Maidstone Road (Hop Farm Roundabout)
- **Junction 13** – A228 / B2017 (Badsell Roundabout)
- **Junction 14** – A228 / Alders Road / Crittenden Road staggered junction
- **Junction 88** – B2017 / Hartlake Road priority junction

Additional hotspots are identified but these are further afield from the area around Paddock Wood and as such those listed above are considered the most relevant.

It should be noted that the junctions identified above have also been identified previously as part of the evidence base.

Even after applying the Modal Shift assumptions, all of the junctions continue to be defined as ‘Major’ hotspots, warranting further review and physical mitigation / intervention.

It is noted that no further consideration has been given to Junctions 14 or 88 as part of assessment methodology. For the former, it is said that the Colts Hill bypass would result in a reconfiguration of this junction and the mitigation for this location would be provided as part of this scheme. For the latter, it was noted that Hartlake Road is a rural road with limited trips, with the capacity issues arising as a result of the mainline flows. Given the nature of the junction, it was not considered that mitigation was warranted and that it could be assessed using Monitor and Manage.

However, with respect to Junction 88, it should be noted that as part of the TGV proposals this junction was to be repurposed, closing Hartlake Road to traffic and redirecting movements via purpose built new junctions to support the development⁴. As a result of the removal of TGV, these measures will no longer be implemented. It is clear that capacity issues will remain with no solution presented at the current time, so rendering the Plan unsound.

Further mitigation measures are said to be proposed for the remaining junctions which are summarised as:

- **Junction 8** – A26 / B2017 Tudeley Road roundabout (Somerhill Roundabout) – entry lane widening on B2017 Tudeley Road (this mitigation is broadly in-keeping with that proposed previously, with Tudeley Village included⁵);

³ TWLP_123 Appendix 1 SWECO Strategic Transport Assessment (April 2024)

⁴ CD 3.112 Local Plan Transport Evidence Base: Transport Assessment Report Update for the Pre-Submission Local Plan (March 2021), Page 10

⁵ PS_024 (CD 3.167) Tunbridge Wells Local Plan – Local Junction Capacity Sensitivity Testing Technical Note (March 2022)

- **Junction 12** – A228 / B2160 Maidstone Road (Hop Farm Roundabout) – increased flare lengths on A228 (S) and B2160 arms of the junction (this mitigation is broadly in-keeping with that proposed previously, with Tudeley Village included⁶); and
- **Junction 13** – A228 / B2017 (Badsell Roundabout) – larger roundabout proposed, connecting to Colts Hill bypass.

Two separate scenarios have then been run as part of Appendix 1, with mitigation measures in place. The mitigation measures implemented are summarised for ease below:

Table 21: Local Plan Highway Mitigation Model Scenarios

Mitigation	LPHM1	LPHM2
Sustainable Transport Interventions (see Chapter 4)	✓	✓
Colts Hill Bypass	✓	✓
Badsell Roundabout Improvements	✓	✓
Somerhill Roundabout Improvements	✓	✓
Hop Farm Roundabout Improvements	✓	✓
Kipping's Cross Roundabout Improvements	✓	
Pembury Road Capacity Improvements		✓

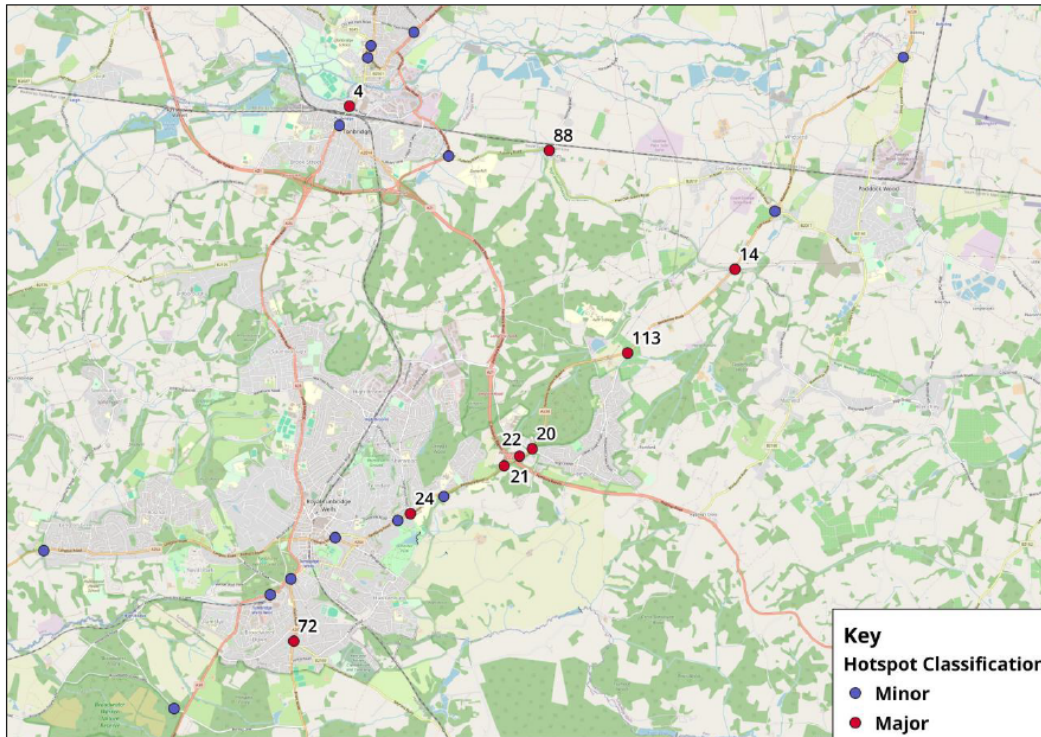
The ‘Pembury Road Capacity Improvements’ relate to the alternative strategy for Kippings Cross, which is said to offer capacity betterment on the A228 corridor. As noted, this strategy is at a very early stage and lacks detail. A nominal assumption has instead been applied to allow for *potential* capacity improvements (assumed to be a 10% capacity improvement at each of the junctions on the A228 corridor). Little reliance can be placed on this approach, without further detail as to actual (and feasible) capacity solutions for this corridor, which are capable of being modelled.

Taking the LPHM1 scenario, whilst Junctions 8, 12 and 13 above fall outside the ‘Major’ hotspot classification as a result of the interventions outlined, Junction 14 remains a “major” hotspot, despite the inclusion of the Colts Hill bypass. It is unclear to what extent the bypass mitigation has been reflected in the modelling.

Moreover, a new ‘Major’ hotspot and several new ‘Minor’ hotspots are identified in Tonbridge town centre, as shown below.

⁶ PS_024 (CD 3.167) Tunbridge Wells Local Plan – Local Junction Capacity Sensitivity Testing Technical Note (March 2022)

Figure 20: Hotspot Junction Locations – Local Plan Highway Mitigation Option 1



Junction 4 (B2260 High Street / Railway Approach / Vale Road / Barden Road) is now identified as a hotspot in this scenario but there is no reference to these new hotspots in the text of Appendix 1. It is unclear how far these new scenarios have been interrogated as part of the evidence base.

Moreover, although it was indicated at the Matter 3 hearing that hotspots in Tonbridge town centre no longer arose with the removal of Tudeley, in the above scenario this does not appear to be the case.

With Tudeley in place, the impacts within Tonbridge would not be severe (as explained in Markides Associates' response to the Inspector's Initial Findings⁷ and the Council's hearing statement⁸). However, no further analysis of the impacts on Tonbridge town centre has been carried out as part of the updated evidence base, despite the information shown above in Figure 20.

There is also a 'Major' hotspot at the A228 / Maidstone Road priority (Junction 113) and yet (as with the Tonbridge hotspots), no further analysis appears to have been undertaken.

The evidence presented therefore appears to be inconsistent and unsound, with new hotspots noted in the implementation of wider mitigation measures but with no further analysis undertaken. The uncertainty surrounding Kippings Cross clearly has repercussions for other junctions, which has not been sufficiently considered. There is plainly insufficient evidence to demonstrate that the implications of the revised strategy will not result in highway safety or residual cumulative impacts.

⁷ Technical Note – Response to Inspector's Initial Findings for Tunbridge Wells Borough Council Local Plan, Tudeley Village (April 2023), produced by Markides Associates

⁸ TWLP_123 Matter 3 Issue 1 Location and Accessibility (Issue 1, Question 1)

Q4. Where mitigation is required, can any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?

As explained above in response to Q3, there are significant question marks over the strategy for the Kippings Cross improvement works, which appears to have repercussions for the wider highway network.

In the absence of this evidence, there is no evidence that cost effective mitigation can in fact be provided where required to support the main modifications revised strategy. As a result of the proposed deletion of TGV, the revised strategy is not robustly evidenced or justified and the plan is unsound.

The unsoundness of the revised Plan can be remedied by reinstating TGV as a strategic allocation. Alternatively, and without prejudice to the above, the Inspector is asked (i) to pause the plan process to allow any remaining shortcomings in the evidence base to support the TGV allocation to be addressed by the Council, in order to reinstate TGV and render the plan sound; or (ii) failing that, to require the Council to undertake an immediate review, focused upon growth at TGV, to ensure that future infrastructure requirements for the whole area are identified and planned for at the outset.