

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Hearing Statement

Matter 3: The Strategy for Tudeley Village Issue 1: Location and Accessibility

Document Reference: TWLP/123



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Matter 3 – The Strategy for Tudeley Village

Issue 1 – Location and Accessibility

Inspector’s Question 1: [re. Tonbridge Town Centre and highway network ‘hotspots’]

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?

TWBC response to Question 1

Introduction

1. This question is raised within paras 21 to 23 of the Initial Findings letter [[ID-012](#)], which states the following: -

“In summary therefore, at present there is insufficient evidence to suggest that the scheme will achieve the levels of internalisation and changes in modal shift necessary to adequately mitigate against the likely increase in car travel. Given the existing constraints and congestion in Tonbridge town centre, the cumulative impacts of the scale and location of development would be severe. It has not been adequately demonstrated that the impacts can be cost effectively mitigated to an acceptable degree”.

2. The potential highways impacts relative to the allocation of Tudeley Village, were set out within the Council’s evidence comprising The Highways Sensitivity Test Addendum Report [PS_023] where this matter is discussed at paras 3.4.1 and 3.4.2. The matter of highways projections was discussed within the Council’s Hearing Statement for the Stage 2 hearings (Summer 2022) in response to the Inspector’s questions concerning transport projections (Document Reference: [TWLP/022](#) (Matter 6, Issue 1, Question 14, paras 115 to 122, discussed at the hearing session on 14/06/2022) where the robustness of the

projections modelling is set out which assumes a worst case position without incorporating the potential of internalisation of trips at Tudeley and modal shift.

3. The Inspector considers that further evidence concerning the necessary levels of internalisation at Tudeley and modal shift envisaged is necessary in order to support the proposed allocation at Tudeley.
4. The Development Strategy Topic Paper Addendum [\[CD_054 paragraphs 3.14 – 3.37\]](#) sets out the Council's position with regards to the Location and Accessibility of the Tudeley Village site in regard to specific matters that have been raised in the Initial Findings:
 - Potential for walking and cycling links: While there is scope for further work in respect of route design/lighting/safety/land ownership, these are more detailed matters, that may be readily provided if necessary to address the Inspector's concerns on Tudeley Village
 - Rail and bus infrastructure: Whilst land is proposed to be safeguarded for the provision of a railway station, Network Rail consider that the proposed growth in Tunbridge Wells borough does not require specific rail capacity interventions. In regard to bus use this is further clarified below
 - Congestion in Tonbridge Town Centre: The Council position is that the impacts on Tonbridge would not be severe, although it was accepted that without further evidence it would be difficult to satisfy Tonbridge and Malling Borough Council
 - Modal shift: A 10% Modal Shift was identified as part of the strategic site delivery.
5. Hotspots are covered in section 5 of the Development Strategy Topic Paper Addendum in so far as it relates to the proposed changes in response to the Initial Findings.

Consideration

6. The view of the Council's Highways consultants, as set out at the hearing sessions, is that Tonbridge town centre would not unduly suffer from congestion with the allocation of Tudeley Village, which is discussed at para 3.31 of the Development Strategy Topic Paper Addendum [\[PS_054\]](#). A further factor here since the Stage 2 hearings is that the Tudeley proposals incorporated a modal shift away from private car use which would be in accordance with the recent [DfT Circular 01/22 'Strategic road network and the delivery of sustainable development'](#) (gov.uk). As set out at paragraph 12 of this document, this

circular requires consideration of sustainable transport options to move away from private car travel for some trips.

7. The Council's evidence accepts that there are congestion issues in Tonbridge Town Centre with limited opportunities to increase capacity (The Highways Sensitivity Test Addendum Report [PS_023] paragraph 3.4.1). Although, this should be considered in the context of whether the residual highways impacts would be 'severe' as set out within para 115 of the NPPF. The Council's position is that the evidence suggests that this would not be the case, and modal shift would support this.
8. Since the publication of the Inspector's Initial Findings Letter [[ID-012](#)], the Council has undertaken a significant amount of work in response to the matters raised by the Inspector including a review of all of the transport modelling.
9. Insofar as it relates to the Submission Local Plan, an overall strategy for bus service improvements was still in development during the Stage 2 hearings. The progress of the borough wide Bus Study (now in final form) has been submitted as part of the additional post-Initial Findings evidence base [[Tunbridge Wells Bus Feasibility Technical Note PS_058](#)]. It sought to examine the current local bus network operating across the TWBC area and understand how the current local bus network and any subsequent changes to routes, supporting infrastructure, and service levels may support the planned population expansion brought about by the adoption of the Tunbridge Wells Borough Local Plan (2020-2038),
10. The evidence within Bus Feasibility Review indicates the contribution that an enhanced bus service could make in meeting the needs for residents at Tudeley Village and ultimately such improvements would help in the meeting of the 10% modal shift target.
11. The Transport Assessment [CD 3.114] identifies bus improvements included in the Bus Feasibility Technical Note contributing to meet the 10% modal shift aspirations for the Submission Local Plan. and therefore, lessening the impact on identified hotspots and Tonbridge High Street.
12. Since the Initial Findings were received a further set of transport modelling has been undertaken as part of the exploration of the option for the removal of the Tudeley Village allocation (STR/SS 3). Further work which the Council has undertaken at this time, following the Initial Findings letter, does not assess this matter further in respect of the highways impacts from development at Tudeley Village. This is due to the change to the

development strategy as set out by the Council within Local Plan Development Strategy Topic Paper Addendum [[PS_054](#)] paras 12.1 to 12.7, to remove Tudeley Village as an allocation from the submitted plan.

13. The Council considered the most appropriate course of action at this current time, was to undertake highways impact modelling appraisals regarding the revised development strategy for reduced growth at Paddock Wood and east Capel. This work does assess the impact on the highway network as a result of the reduced growth option at Paddock Wood and east Capel (see **Appendix 1**) which does include Tonbridge Town Centre and other 'hotspots' within the highway network. This will be discussed further in later Hearing Statements in relation to The Strategy for Paddock Wood, including Matter 4 – The Strategy for Paddock Wood, Issue 4 – Highways Infrastructure and Matter 7 – Highways Infrastructure, Issue 1 – Strategic and Local Road Networks.
14. The Councils Statement of Common Ground with Kent County as Highways Authority [[PS_025](#)] states ' KCC and TWBC agree that the sensitivity testing, using TRICS combined with ARCADY and LinSig modelling of individual junctions, has confirmed that the original strategic modelling undertaken and the mitigations identified in the Local Plan Evidence Base: Transport Assessment Report Update for the Pre-Submission Local Plan (Transport Modelling report) can effectively mitigate any significant impacts from the development on the transport network in terms of capacity and congestion, or on highway safety, to an acceptable degree. These mitigations are reflected in the Infrastructure Delivery Plan.' (paragraph 3.20)
15. Turning to the second part of the Inspector's question, could potential highway impacts from development at Tudeley Village be cost effectively mitigated to an acceptable degree, the Council considers this is possible and could develop from the significant level of assessment already undertaken for the Submission Local Plan. Further detailed modelling work could be undertaken regarding Tonbridge Town Centre impacts in partnership with Tonbridge and Malling Borough Council (TMBC) and Kent County Council (KCC) as Highway Authority. This work could also encompass further assessments on sustainable transport infrastructure options to provide greater confidence on realistic modal shift targets. In particular, more detailed cycle routing/design to strengthen envisaged connections and evaluation of bus improvements explored through a Bus Study [[PS_058](#)], (which concluded following the Stage 2 hearings and is discussed in more detail in response to the Inspector's Question 2 below). More detailed work could

also be undertaken in relation to internalisation of trips within the development (with the knock-on effect of lower external trips) and how this could realistically be delivered and sustained.

Conclusion

16. The Council considered at the Stage 2 hearings that congestion in Tonbridge town centre would not unduly suffer from the allocation of Tudeley Village and that these impacts would not be severe.
17. Further evidence in the form of the Tunbridge Wells Bus Feasibility Technical Note [[PS_058](#)] supports the delivery of a 10% modal shift target which would support the transport modelling position of the Submission Local Plan.
18. The Council is of the view that the infrastructure requirements for the Submission Local Plan and its delivery would mean that the impacts on the highway could be cost effectively mitigated so that the residual impacts are not severe.

Inspector's Question 2: [re. Allowance for modal shift]

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?

TWBC response to Question 2

Introduction

19. The Inspector's Findings [\[ID-012\]](#) in respect of this issue are summarised at Paragraph 13 which states:

“Pedestrian and cycle links would be provided as part of the scheme and there is a commitment to include a new dedicated route into Tonbridge. Although this could be secured by policies in the Plan, the distances involved to the centre of Tonbridge and back would not be conducive to walking. Likewise, it would be unrealistic to expect a significant number of people to cycle into Tonbridge, especially during the darker, winter months or during periods of inclement weather”.

20. The Local Cycling and Walking Infrastructure Plan (LCWIP), [\[CD 3.115b\]](#), forms part of the Council's evidence for the Stage 2 hearings which outlines a strategic approach to identifying cycling and walking improvements required to support the growth proposed.

21. The Phase 2 LCWIP document was published in March 2021 [\[CD 3.115b\]](#) and further developed measures to support sustainable transport modes.

Consideration

22. The Transport Assessment [\[CD_3.114\]](#) executive summary sets out what work has then been undertaken to understand what mitigation measures could be applied to help reduce congestion. Mitigations have been identified with multimodal, highway, public transport, and cycling/walking schemes. These mitigations were then benchmarked against the implementation of similar schemes in the UK to identify the potential for modal shift for the sustainable transport schemes, in conjunction with reviewing the outputs for the Tunbridge Wells region from the Propensity to Cycle Tool (PCT) modal shift analysis.

23. The Transport Assessment work identifies a potential 10% modal shift in projected new Local Plan trips from highway to sustainable transport, and identified mitigation measures which would enable such a modal shift target to be met. These mitigation measures are identified in the Infrastructure Delivery Plan [\[CD_3.142\]](#).

24. The focus of walking routes would primarily concern connections within the Tudeley Village settlement due to the distance of 4km to Tonbridge Town Centre. Together with the level of internal services within the settlement, suitable and easily accessible walking routes would be a fundamental contributor to delivering internalisation at Tudeley Village. This would provide good accessibility to key services and neighbourhoods and to cycle routes linking through the settlement from its centre to Tonbridge Town Centre. Given the fairly level terrain, the distance of 4km is well suited to cycle connectivity, and a main cycle route was a key element of the proposal by Hadlow Estate. This would provide a route to Tonbridge Town Centre within 15 minutes cycle ride and with the developers in control of land to enable such a route to connect to the existing highway network.
25. The Inspector has made particular reference to usage of a cycle route during winter months and periods of bad weather. Having considered this point, the Council considers such issues would apply to all cycle routes across the country and that design solutions, including suitable surfacing and lighting, could support usage of the cycle route in less comfortable conditions as well as the use of appropriate clothing.
26. It should also be noted that the walking and cycling connections which could be delivered at Tudeley Village, could link to a network of other connections to Paddock Wood and Five Oak Green as part of the wider enhancements to connectivity set out within the LCWIP documents [[CD 3.115b](#)], supporting the wider sustainability and the modal shift aspirations overall.
27. For public transport options, Tudeley Village is positioned between Paddock Wood and Tonbridge rail stations and through the connections discussed above, journeys using sustainable modes would be possible to access rail links to London and the Medway Towns. The developer's intention for Tudeley, is to safeguard this for a new rail station for the future needs, This informed the proposed Policy for Tudeley within the Submission Local Plan [[Map 32, on page 161](#)], which outlines a location for a potential train station. Discussions have been undertaken with Network Rail as to whether a new station could form part of any strategic development, however, it is understood that this would not be deliverable within the plan period and the proposed growth in Tunbridge Wells borough does not require specific rail capacity interventions. Such infrastructure would also need to be assessed against the wider development viability and whether any external funding would be available to support delivery if required in the future.

28. In terms of bus transport options, proposed service enhancements were set out within one of the Council's hearing statements to the Stage 2 hearings in Summer 2022 Document Reference: [TWLP/022](#) (Matter 6, Issue 1, Question 15, paras 141 to 149). However, significant progress has been made on this issue since the stage 2 hearings with the completion of a further bus study [[PS_058](#)], exploring options for upgrading the bus network on the Paddock Wood to Tonbridge corridor, the Paddock Wood to Tunbridge Wells corridor and the Tonbridge to Tunbridge Wells corridor. This would provide a significant enhancement to the network and could improve services in accordance with 'Bus Rapid Transit' characteristics with other options also implementable. This is also referenced within The Provisions for Sustainable and Active Travel document [[PS_053](#)], which also sets out a new bus service which could be delivered at Paddock Wood. The Council considers that this demonstrates there are credible and viable options for bus transport enhancements available to make bus travel a more attractive option at Tudeley Village.

Conclusion

29. The above response to Question 2, outlines that evidence has been prepared to provide assurance that there is significant potential for modal shift to walking, cycling and public transport. The supporting evidence outlined above justifies the measures which have been proposed and whilst further evidence could be provided in terms of the sustainable connections, the progress concerning bus enhancements is significant and demonstrates that the allocation could be made sound in the Council's view.

Appendices

Appendix 1: SWECO - Strategic Transport Assessment – Modelling Appraisal (18/04/2024)

Please see document TWLP_123_Appendix 1 - SWECO Strategic Transport Assessment