

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

Matter 7: Highways Infrastructure
Issue 2: Policy Requirements

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Matter 7 – Highways Infrastructure

Issue 2 – Policy Requirements

Inspector's Question 1: [re. Is the plan sufficiently clear?]

Where mitigation is required, is the Plan sufficiently clear what is required, where and when? Is the Plan effective in this regard?

TWBC response to Question 1

Introduction

1. The Development Strategy Topic Paper Addendum [[PS_054](#)] sets out the Council's response to the Initial Findings [ID_012] and which is amongst other things, a revised growth strategy for the Strategic Sites which incorporates significantly less housing growth as opposed to the Submission Plan. Equating to a reduction of some 918 dwellings from the 3,450 dwellings proposed by the Submission Plan for STR/SS 1 Paddock Wood and land at east Capel and the removal of the STR/SS 3 allocation for Tudeley Village.
2. The Masterplanning Addendum document [[PS_046](#)] (which sets out the Masterplanning approach for the reduced growth option for PWeC) also incorporated a revised infrastructure schedule within table 8 relative to the reduction in growth now proposed.

Consideration

3. The Infrastructure Schedule at table 8 of the Masterplanning Addendum document [[PS_046](#)] is a useful illustration of the highway improvement requirements and incorporates their broad positioning and delivery window (short/medium/long term) based upon the updated modelling in response to the reduced level of growth.
4. This has been factored into the infrastructure costings at an early stage and the revised viability testing which is set out within the Addendum to Local Plan Viability Assessment [[PS_061a](#)] and Appendix [[PS_061b](#)]. Table 1A, within the latter document lists all of the highway improvements (along with all other elements of infrastructure) and also includes a delivery window.

5. Whilst the Council has not updated the Infrastructure Delivery Plan (IDP) at this stage, it is envisaged to form part of the Main Modifications process and will be fully updated to reflect the revised growth strategy. The Council are also working on an updated Infrastructure Schedule document (to form an interim document) and will draw elements together from several highways technical notes and the viability testing. This is currently work in progress and the subject to final review, but the Council anticipate this being published in good time ahead of the hearing sessions.
6. The Council has also continued regular discussions with developers and stakeholders through this process of revising the Strategic Sites growth strategy and any adjustments to necessary highways infrastructure. This has been important to ensure the delivery trajectory of the developments themselves is not compromised and the annual trajectory envisaged continues to be realistic and deliverable.
7. Policy STR/SS 1 has also been modified (included at Appendix 1 of the Council's Matter 4 Issue 3 statement) to better reflect the individual parcels of land that will come forward from different developers and includes a series of Development Principles, Masterplanning requirements, and what the elements of Strategic Infrastructure are.
8. Through both the updated Infrastructure Schedule and the IDP (as part of the main modifications process) and revisions to Policy STR/SS 1, the Council consider that these alterations, together with the changes forming part of the revised growth strategy for the Strategic Sites, are sufficient to demonstrate that the Plan will be justified and effective.

Inspector's Question 2: [re. Have the costs associated with Highway infrastructure been tested and will it be viable?]

Have the costs associated with the necessary highways infrastructure been tested and will it be viable?

TWBC response to Question 2

Introduction

9. The Councils approach in responding to the Initial Findings has been set out in previous Stage 3 Hearing Statements, and has in summary resulted in a comprehensive review of the development strategy as set out in the Development Strategy Topic Paper Addendum [[PS 054](#)] (DSTPA).
10. DSTPA sets out what the proposed changes to the plan are and the key infrastructure requirements are outlined in the Strategic Sites Master Planning and Infrastructure Study Follow on Study [[PS 046](#)] (FOS) to ensure the development can come forward with the necessary infrastructure to meet the local requirements.
11. The Councils Consultants Dixon Searle Partnership have undertaken a Addendum to the Local Plan Viability Assessment Main report [[PS 061](#)].

Consideration

12. The Council's consultants Dixon Searle Partnership (DSP) has undertaken a comprehensive review of the associated infrastructure cost assumptions in the FOS relating to the revised development at Paddock Wood and land at east Capel (STR/SS 1) (PWeC) and the associated highway mitigation measures that have been identified.
13. The majority of assumptions remain as per Stage 2 financial viability assessment (VA) including the Submission Local Plan development management policies (those policies that influence viability through additional cost to development). Therefore, it has not been necessary to update the assumptions wholesale as most remain appropriate to continue with for the purpose of the strategic assessment.
14. Some adjustments have been made to reflecting the lower scale of development that is identified at PWeC as a result of the Council's position to have housing only in Flood Zone 1. Nevertheless, in the main the infrastructure costs allowances have remained in

proportion with the previous schedule of infrastructure required for the SLP. The broad cost estimate per dwelling remains very similar to the previous allowances so that the adjustment for inflation and scale of development is the main difference.

15. The Viability Assessment Addendum has also included explicit cost assumptions reflecting allowances for biodiversity net gain (BNG) and electric vehicle charging points (EVCPs) provision, being as they are national and building regulations requirements respectively. TWBC emerging policy in relation to the provision of accessible new homes i.e. to building regulations Part M4(2) and M4(3) through have also been included.
16. The Viability Assessment Addendum has included the specific junction improvements associated with the transport modelling work based on cost assumptions that have been reviewed and based on any likely cost increases since the Stage 2 hearings, and the viability assessment includes a contingency of up to 5% to cover any variances that may come forward.
17. The junctions requiring work are included in the Development Appraisals Assumptions Overview tables 1 and 1a [PS_061b]
18. The costs associated with the necessary highways infrastructure been tested and the viability Assessment Addendum demonstrates that the Plan will be viable.