

Tunbridge Wells Borough Local Plan Examination Matters, Issues and Questions (MIQs)

Matter 7: Highways Infrastructure National Highways' Statement

Issue 1: Strategic and Local Networks

Q.2: 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 Analysis remain relevant?

1. National Highways (NH) has previously engaged in detailed discussions with TWBC and their appointed consultants in relation to the appraisal of the impacts at Kippings Cross. As has been set out in our response to the Inspector's Initial Findings Consultation, the suggested changes to the Plan would reduce the overall transport impact of the Plan due to the removal of Tudeley Village and other small sites, and modifications to the proposals at Paddock Wood. However, in terms of the main issues observed at Kippings Cross itself (which are described in the Strategic Transport Assessment) these have not altered materially as a result of the suggested changes.
2. NH stated in its response to the Initial Findings Consultation that further technical work would be required prior to any Main Modifications consultation (and ideally prior to the Stage 3 hearings) to resolve a number of outstanding matters, which include the approach to be taken with regard to Kippings Cross. Significant

additional technical work has subsequently been undertaken, both by SWECO in terms of updating the Strategic Transport Assessment and carrying out additional strategic modelling exercises, and by Stantec via a study of the A21 Pembury Corridor (it has been identified in the currently submitted Strategic Transport Assessment that the performance of this corridor has a direct impact on the routing of vehicles within the borough and specifically to and from Kippings Cross). Whilst the documents which correspond to this work (the updated Strategic Transport Assessment and the Mitigation Modelling Technical Note respectively) have not been formally submitted to the examination at the time of preparing this statement, it is understood that TWBC intends to do so in parallel with submission of their own Hearing Statement. These documents effectively supersede the previous Local Plan Mitigation Option Analysis document referred to in the question.

3. It is intended that a summary of how the updated proposed approach to mitigation for Kippings Cross (and other locations on the SRN) has been developed will be included in a Statement of Common Ground (SoCG) between TWBC and NH. At the time of preparing this statement NH had not received an updated SoCG from TWBC. However, for the purposes of informing the hearing sessions, the key elements of the updated approach are set out under our response to Question 4 below.

Q.3: 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 network be severe as a result of the Local Plan?

4. The proposed changes to the Plan are expected to result in an overall reduction in vehicle trips associated with Local Plan development, as set out in the Council’s response to the Inspector’s Initial Findings Consultation. From the

perspective of NH, the “hotspots” other than Kippings Cross (discussed above) include the A21 / A228 “dumbbell” junctions at Pembury, and the A21 Flimwell Crossroads. The specific changes to the vehicle trip generation and distribution associated with the proposed changes to the Plan have not materially altered the appraisal of these locations. As has been described with reference to question 2, further work has been undertaken in consultation with NH to address outstanding issues at these locations.

5. With regard to the A21 / A228 dumbbell junctions, the further work has concluded that mitigation measures at these junctions and neighbouring junctions under the management of KCC Highways on the A21 corridor would be necessary to address the Local Plan impacts, but that with these measures in place there would not be any unacceptable impacts to highway safety, nor would the residual cumulative impacts on the Strategic Road Network (SRN) be severe as a result of the Local Plan. We have reached this conclusion on the basis of the capacity assessments of the junctions in question, and examination of changes to delays and queue lengths (which are associated with changes in highway safety risks).
6. The requested additional analysis of the traffic flows at the A21 Flimwell Crossroads (which is set out in technical note appended to the NH response to the Inspector’s Initial Findings Consultation) has been completed and it has been concluded that there would not be any unacceptable impacts to highway safety, nor would the residual cumulative impacts on the SRN at this location be severe as a result of the Local Plan.
7. The supporting technical evidence relating to paragraphs 5 and 6 is understood to be included in the updated Strategic Transport Assessment and Mitigation Modelling Technical Note.

Q.4: 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?

8. It has been determined via the completion of the further technical exercises set out in the technical note appended to the NH response to the Inspector's Initial Findings consultation that the significant impacts of the proposed Local Plan on the SRN can be acceptably mitigated via a series of improvements to junctions on the A21 Pembury Corridor.
9. The technical work carried out to develop these mitigation proposals has identified that by improving the operation of these junctions, there will be a re-distribution effect on traffic in the wider area which will divert traffic away from the A21 Kippings Cross junction and reduce the residual impacts at this location to a degree where it is considered that mitigation works are not required in relation to Local Plan impacts.
10. The mitigation proposals also address the potential impacts at the A21 dumbbell roundabouts which were previously identified and described in the technical note appended to the NH response to the Inspector's Initial Findings consultation.
11. For clarity, the mitigation proposals for the A21 Pembury Corridor include improvements at the A21 / A228 Dumbbell roundabouts and at three further junctions on the corridor which are the responsibility of KCC Highways. All of the identified schemes are required to be implemented to achieve the required mitigation of the Local Plan impacts.
12. Costs, potential sources of funding, and who will promote and deliver the mitigation are matters for the Council to address as the organisation responsible for preparing the Local Plan which has given rise to the need for the highway

mitigation. NH are concerned about the safety, reliability, and operational efficiency of the SRN. Our focus is on ensuring that the necessary mitigation to support the development strategy in the Local Plan is identified. NH will not promote or deliver these schemes, with the priorities for the SRN being set out in the Road Investment Strategy (RIS). The Department for Transport (DfT) Circular 01/2022 (December 2022) is clear at para. 29 that there cannot be any presumption that necessary supporting infrastructure will be funded through a future RIS. However, NH will be involved in the process of checking the safety of the schemes as the designs are developed and will oversee the governance of third-party projects via s.278 agreements. The evidence supporting the Local Plan shows that the identified mitigation schemes for the SRN are necessary to safely accommodate the traffic on the SRN that is likely to arise from the development included within the Plan.

Issue 2: Policy Requirements

Q.1: Where mitigation is required, is the Plan sufficiently clear what is required, where and when? Is the Plan effective in this regard?

13. The requirements for mitigation of impacts to the SRN are considered to be addressed in the Plan via the Infrastructure Delivery Plan (IDP) and the policies relating to specific large allocations (Paddock Wood) as well as more general policies relating to development and infrastructure.
14. NH has been consulted on a number of proposed updates to the IDP which address points relating to the role of NH, the application of Circular 01/2022 and the representation of the specific schemes which are proposed to mitigate the expected Local Plan impacts on the SRN. It is understood that an updated version of the IDP incorporating these changes is to be submitted to the

Examination in parallel with TWBC's hearing statement on the relevant matters. At the time of preparing this statement, NH is happy with the progress being made on the update to the IDP.

15. It is important to note that NH is not identified as a delivery partner in relation to any proposed works to the SRN. This role will be fulfilled either by one or more developers, or by TWBC. This reflects the expectations of DfT Circular 01/2022, as highlighted above. For clarity, NH will participate fully in relation to the further development and detailed approval of mitigation schemes (including safety checks) prior to their implementation. However, all responsibility for the funding, contracting, and delivery of necessary works will remain with the developer(s) or TWBC with governance managed through a s.278 agreement with NH where it relates to the SRN.

16. A number of further changes to the main Local Plan text and policies are also understood to be proposed, in response to previous NH (and KCC Highways) comments. These changes relate primarily to the integration of the "Vision and Validate" and "Monitor and Manage" concepts into relevant policies and relate to the following:

Section 4 (The Development Strategy and Strategic Policies)

STR2 – Place Shaping and Design

STR4 – Ensuring Comprehensive Development

STR5 – Infrastructure and Connectivity

STR6 – Transport and Parking

Section 5 (Place Shaping)

STR/SS1 – The Strategy for Paddock Wood, including land at East

Capel

Section 6 (Development Management Policies)

EN1 – Sustainable Design

TP1 – Transport Assessments / Statements, Travel Plans, and
Mitigation

TP2 – Transport Design and Accessibility

TP3 – Parking Standards

17. We have provided some minor comments and suggested amendments to the proposed text revisions, and consider that these proposed changes clarify how the requirements of the “Vision and Validate” approach defined in Circular 01/2022 will be met through the application of the relevant policies and are thus suitable to make the Plan effective and consistent with national policy . In the interest of future-proofing the Local Plan, NH recommend that the following additional text is included after references to Circular 01/2022: “...or whatever represents national policy for the Strategic Road Network (SRN) at the time the decision is taken..”. We note that KCC has also been consulted on these changes and has proposed some minor amendments, which we are in agreement with.

18. The timeframes for delivery of the specific identified mitigation measures on the SRN (including those on KCC’s network which contribute to the wider mitigation effects on traffic distribution) have not as yet been updated in the IDP text; this will need to be undertaken and it is understood that this will take place to inform the preparation of the main modifications for consultation.