

## Matter 3 – The Strategy for Tudeley Village

### Issue 2 – Five Oak Green Bypass

Q1. The Council's position (as set out in paragraph 3.39 of Examination Document PS\_054) is that "...the bypass would be necessary to accommodate the traffic generated by the new settlement, when developed alongside the major expansion of Paddock Wood." What evidence is there to demonstrate that the expansion of Paddock Wood would therefore remain acceptable without a bypass of Five Oak Green?

1.1 Based on distribution analysis conducted by the Persimmon / Redrow applicant team, Five Oak Green Road would support in the order of 15% development traffic heading to and from the west for PWeC developments (totalling up to 2,500 units) whilst the same route would support >30% Tudeley Village traffic (2,800 units) heading south and east towards Tunbridge Wells and the A21.

1.2 It is clear therefore that the inclusion of Tudeley Village within the LP would generate a significantly greater volume of new traffic along Five Oak Green Road and the potential Bypass route. In this vein the Submission Local Plan concludes "*The Five Oak Green bypass is largely required to alleviate issues caused by strategic development at Tudeley Village and the viability assessment shows that this can be delivered wholly by the Tudeley Village Garden Settlement.*"

1.3 The level of additional traffic generated along the B2017 corridor, as assessed within Examination Document PS\_049 'SWECO TW Local Plan Stage 3 Modal Shift Reporting', concludes that improvements here should take the form of 'wider traffic management measures' to direct additional traffic to the strategic road network, as opposed to a major highways scheme to accommodate traffic, such as the Five Oak Green Bypass. Such traffic management measures could take the form of speed reduction and attenuation features, supporting sustainable transport interventions and modal shift enablers, and could be delivered / funded by Paddock Wood developers through planning and Section 106 mechanisms.

Q2. Examination Document PS\_0394 considers the potential effects from the bypass and associated works on the setting of the High Weald AONB, the setting of designated heritage assets, landscape features and ecology, landscape character and historic landscape character and Public Rights of Way. How did the Council take this assessment into account in responding to the Inspector's Initial Findings and what are the reasons for now suggesting that the allocation is unsound?

No Comment

Q3. Have further options been considered for the alignment of the route? Could the same transport infrastructure be provided in another way, for example?

3.1 Conclusions of SWECO LP modelling and the approach taken within the submission LP is to deliver sustainable transport interventions and modal shift to reduce trip generation

on the B2017 corridor and then traffic management measures to alleviate any residual impact.

**Q4. In responding to the Inspector's Initial Findings, Examination Document PS\_039 states that highway safety, noise and air quality concerns around Capel Primary School are valid and would require additional work to address them. Has this additional work been carried out?**

4.1 In reviewing document PS\_039 it is evident that the concerns around highway safety in particular relate to the Five Oak Green Bypass proposal and siting of the western roundabout almost directly opposite Capel Primary School. The removal of Tudeley Village and the Five Oak Green Bypass from the LP would address the direct impact of the roundabout and the majority of additional trips to the network, whilst sustainable transport interventions and traffic management measures along the B2017 corridor would alleviate residual impact.

**Q5. Is the Five Oak Green bypass and associated works justified in the location proposed having regard to the matters identified in the questions above? If not, does this mean that the allocation is unsound?**

5.1 As per the conclusions of the Submission LP, the Five Oak Green bypass is only justified in the event that Tudeley Village comes forward. If Tudeley Village is brought forward, it is noted that further evidence would be required to demonstrate suitability of the bypass and in particular it's western roundabout junction with the B2017, in the form of road safety auditing, noise and air quality assessment.

### Issue 3 – Wider Infrastructure Provision

**Q1. If the Plan is modified to delete Tudeley Village, can the necessary infrastructure be provided elsewhere? For example, the provision of sports and education facilities.**

1.1 Put simply yes, the educational facilities required to accommodate the growth proposed at PWeC can be provided within Paddock Wood without the need to rely on land at Tudeley.

1.2 The Submission Local Plan proposed that secondary educational needs be provided through the provision of a new standalone school as part of the Tudeley Village development with a 2FE Expansion of Mascalls Academy; and that primary school provision be accommodated by way of 2 x two-form entry primary schools, one in the western parcel to the north of the railway line, and one in the eastern parcel, and a three-form entry primary school at Tudeley.

1.3 The proposed modifications look to continue to deliver 2 x two two-form entry primary schools at Paddock Wood, one in the western parcel and one in the eastern parcel. As to secondary education, section 4 of PS\_054 explains that KCC as the local education authority have confirmed that the secondary education requirements for the reduced housing number (circa 2,500 dwellings) would result in there being a demand for an additional 490 pupils to be accommodated in the secondary school education system locally; and that a yield of 490 pupils is equivalent to 3.27 FE. However, when taking onto account the potential

for some flats and 1 bedroom properties this would reduce the requirement to a full 3 FE of additional secondary school provision.

1.4 Various options were then considered by the Council as to how this 3 FE provision could be met, either through existing Secondary Schools found locally such as Mascalls Academy (by 2 or 3FE), Skinners Academy in Tunbridge Wells (1FE)), Leigh Academy, Brook Street, Tonbridge (2-3 FE), Hugh Christie School, White Cottage Road, Tonbridge (1 FE), or a standalone new school. Section 4 of PS\_054 goes on to explain why Skinners Academy and the secondary schools in Tonbridge were effectively dismissed, leaving just the possibility of the expansion of Mascalls or the provision of land for a new standalone school on one of the proposed allocation sites.

1.5 The proposed changes to policy STR/SS 1 under Strategic Infrastructure (2(h)) thus provide for: *'The delivery of secondary school provision equivalent to 3 Forms of Entry (3FE) within the North-Western development parcel, unless it is demonstrated that through feasibility studies that the provision can be delivered through other means such as expansion of existing secondary school provision'* whilst Policy SS/STR 1(A) (vii) goes on to refer to *'Safeguarding of land for 4FE secondary school that has land available to expand to 6FE should it be required'*

1.6 As will be clarified in our reps on Matter 4, Issue 2, the strategic site promoters at PWeC have been in detailed discussions with TWBC, KCC and Leigh Academy Trust (who run Mascalls Academy) about the possibilities of expanding Mascalls Academy from an 8 to an 11FE school. To this end as set out in a separate Statement of Common Ground, a scope for a Feasibility Study to determine whether an expansion of Mascalls Academy to become an 11FE school could be achieved was agreed with KCC, and a Feasibility Study duly undertaken. This has, as set out in the SoCG set out quite clearly that there is sufficient room to facilitate a 3FE expansion to Mascalls Academy by way of a combination of demolition and rebuild and re purposing of existing buildings. The SoCG also explains the phasing and delivery of the proposed works and how these can be arranged to minimise any disruption, and how said expansion works would greatly enhance the school's academic offer.

1.7 In the context of the above, the SoCG explains how the changes to the 'soft outdoor PE' areas could provide new all-weather facilities, including new sports pitches and running track, that would add to that already available at the school, and as they would, like the existing facilities, be made available to outside organisations outside of school hours, enhance the nature of the facilities on offer in Paddock Wood; complementing that proposed as part of the PWeC proposals, and thus helping to create a bespoke sports offer in the town.

1.8 To this end we note that section 4 of PS\_054 explains that whilst the scale of growth proposed within the Submission Local Plan facilitated a new sports and leisure hub, which could incorporate an indoor 25m swimming pool and indoor and outdoor sports facilities including around 10 hectares of land within the western parcel; because of the revised approach to growth it would be reasonable to expect a proportionate reduction in sports and leisure provision. As a result, and following an assessment of existing facilities, it was concluded that an appropriate level of sport and leisure facilities could be accommodated within existing facilities, with some new pitch provision being delivered within the SW

development parcel. The proposed modifications at Policy SS/STR 1 under Strategic Infrastructure (2(5)) thus provide for: ‘Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool); whilst Policy SS/STR 1 (B) (iii) goes on to refer to: ‘*A scheme designed with a landscape led approach; 4.54 hectares of land for sport and leisure provision including outdoor pitches, changing facilities, and car parking*’. Whilst para 4.61 of PS\_054 suggests that this approach satisfies the vast majority of provision set out in the original Structure Plan, and that further intensification of use could occur, for example by the replacement of the grass football pitch with an artificial surface, which can be used for more hours each week, supporting greater levels of participation and provision; the proposed enhancement to the sports facilities at Mascalls would also help complement that now proposed.

**Q2. If Tudeley Village is deleted from the Plan, what highways infrastructure would be needed in Tudeley and along the B2017 from the remaining growth proposed around Paddock Wood? Is this deliverable and viable?**

2.1 Highway improvements along the B2017 as a whole would take the form of ‘wider traffic management measures’ to direct additional traffic to the strategic road network. Such traffic management measures could take the form of speed reduction and attenuation features, supporting sustainable transport interventions and modal shift enablers, and could be delivered / funded by Paddock Wood developers through planning and Section 106 mechanisms.

**Q3. Without the allocation of Tudeley Village, can the Plan deliver the necessary wider upgrades the highway network, such as the Colts Hill Bypass.**

3.1 Whilst also subject to Matter 4 considerations, the removal of Tudeley as a LP allocation would see the removal of the Five Oak Green Bypass as a proposed infrastructure intervention. The delivery of the Colts Hill Bypass<sup>1</sup> and other identified highway upgrades in the LP should be deliverable by the PWeC developments, subject to a better understanding of the exact scale of infrastructure works proposed and the apportionment of costs relative to impact.

**Q4. Given the location of the proposed Colts Hill Bypass, do the issues identified above in respect of landscape character, the Green Belt and the AONB also apply? If so, is this part of the strategy also justified?**

No Comment

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<sup>1</sup> Now we note referred to as the Colts Hill Improvement Scheme which may signify a different scale of works.