

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 4: The Strategy for Paddock
Wood**

Issue 4: Highways Infrastructure

Document Reference: TWLP/137



Contents

Matter 4 – The Strategy for Paddock Wood	3
Issue 4 – Highways Infrastructure	3
Inspector’s Question 1: [re. Impact from deletion of the Five Oak Green Bypass upon highway network].....	3
TWBC response to Question 1	3
Inspector’s Question 2: [re. Is the Colts Hill Bypass required as a result of the growth around Paddock Wood]	5
TWBC response to Question 2.....	5
Inspector’s Question 3: [re. Effects of the Colts Hill Bypass on landscape and heritage] .	8
TWBC response to Question 3.....	8
Conclusion	11
Inspector’s Question 4: [re. Justification for removal of Five Oak Green Bypass and not Colts hill Bypass]	13
TWBC response to Question 4.....	13
Inspector’s Question 5: [re. Reliance upon modal shift when considering future highway network impacts].....	15
TWBC response to Question 5.....	15
Inspector’s Question 6: [re. What strategic highways improvements will be needed as a result of the growth around Paddock Wood, where and when?].....	18
TWBC response to Question 6.....	18
Appendix 1: Modal Shift Analysis Technical Note	21

Matter 4 – The Strategy for Paddock Wood

Issue 4 – Highways Infrastructure

Inspector's Question 1: [re. Impact from deletion of the Five Oak Green Bypass upon highway network]

What effect would the suggested deletion of the Five Oak Green Bypass have on the distribution of traffic across the highway network? Does the growth around Paddock Wood require additional highways mitigation not previously identified?

TWBC response to Question 1

Introduction

1. The Development Strategy Topic Paper Addendum [[PS_054](#)], states at paragraph 3.47 that the Five Oak Green Bypass is intended to serve the Tudeley Village allocation, and notes that development of the Paddock Wood and east Capel strategic sites would still have the potential to cause some traffic harm on the B2017 in the centre of Five Oak Green.
2. The position concerning the highway need for the Five Oak Green Bypass is set out within the Council's Hearing Statement for the Stage 2 hearings (Summer 2022) in response to the Inspector's . Page 4 of 27 Tunbridge Wells Borough Council Matter 3: The Strategy for Tudeley Village - Issue 2: Five Oak Green Bypass Date of publication – May 20204 questions concerning Deliverability of the Five Oak Green Bypass (Document Reference: [TWLP/022](#) (Matter 6, Issue 1, Question 17, para 160) which states that the Five Oak Green Bypass would not be an essential requirement for the Paddock Wood and land at east Capel Strategic Sites as other routes would exist to gain access to the A21 and Tonbridge. However, as highway impacts would still occur through Five Oak Green village as a result of the Paddock Wood and east Capel sites, these developments would be expected to contribute towards traffic control/ traffic calming in order to deal with these impacts.

Consideration

3. As has been outlined in the Council's response to Matter 4, issue 7, the revised growth strategy for the strategic sites at PWeC has resulted in significantly less housing growth now proposed as opposed to the Submission Plan. Up to 2,532 dwellings are now proposed which equates to a reduction of 918 dwellings from the 3,450 dwellings proposed by the Submission Plan.
4. As a result of this reduced level of growth, lower overall highway impacts are caused and the details of this relative to this lower level of growth has been assessed through the further highways modelling work undertaken. Details of this were set out within section 5.2 of the SWECO Strategic Transport Assessment Report (Appendix 1 of the Council's hearing statement for matter 3, Issue 2) and as also discussed in that hearing statement text.
5. With particular respect to Five Oak Green (FOG), this is largely where highways impacts differ between the full growth Submission Local Plan strategy (incorporating Tudeley Village and the FOG Bypass) and the reduced growth strategy (incorporating less growth at PWeC with deletion of both the Tudeley Village allocation and the FOG Bypass).
6. The impacts are assessed and set out at section 5.2.2 of the SWECO document. This shows modelling outputs which illustrates that congestion does rise along the B2017 through Five Oak Green. Having said this, the demand is significantly below the level to justify a major expansion in link capacity or a new link road such as the Five Oak Green bypass. The Council's highways consultant (SWECO) have recommended enhanced traffic management through the area is recommended as mitigation which would have the effect of better supporting the flow of vehicles. Enhanced infrastructure for sustainable travel modes could also assist. KCC Highways also agree with this mitigation approach following discussions on this matter.
7. Overall, the further work on the revised growth strategy for Paddock Wood and east Capel and the associated highway modelling discussed above, demonstrates that the highways impacts are less than the full growth strategy within the Submission Local plan and that the impacts can be suitably mitigated to an acceptable degree without the need for the FOG Bypass.

Inspector's Question 2: [re. Is the Colts Hill Bypass required as a result of the growth around Paddock Wood]

Is the Colts Hill Bypass required as a result of the growth proposed around Paddock Wood? How will it be funded and delivered?

TWBC response to Question 2

Introduction

8. The Development Strategy Topic Paper Addendum [[PS_054](#)], outlines at section 6.0, the infrastructure elements necessary to support the revised growth strategy for Paddock Wood and east Capel (PWeC). This includes the Colts Hill Bypass as a main junction strategic transport improvement.
9. 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 of that document which incorporates the Colts Hill Bypass.

Consideration

10. In terms of updated highway modelling, further detailed modelling work has been undertaken to assess the impacts from the reduced growth strategy at PWeC, the changes in highway impacts caused (from the full growth strategy option) and the measures necessary to mitigate the impacts. This is set out within the section 5.9 of the SWECO Strategic Transport Assessment Report ([Appendix 1 of the Council's hearing statement for matter 3, Issue 2](#)) which outlines the model scenarios where the Colts Hill Bypass is delivered as a mitigation measure which is effective. As such, the Colts Hill Bypass is necessary as part of the proposed strategic sites at PWeC.
11. In terms of funding, the Council's position is that the strategic sites themselves would fund this element of infrastructure. This has been factored into the infrastructure costings at an early stage (including at the Submission Local Plan stage). As a result of the revised growth strategy and further Masterplanning, it was necessary to re-visit this for two reasons. Firstly, as to whether this could still be funded with a significant reduction in the level of growth and secondly, any alterations in costs from the revised Colts Hill Bypass scheme design. Both matters were factored in to the subsequent

revised viability testing which is set out within the Addendum to Local Plan Viability Assessment [[PS_061a](#)] and Appendix [[PS_061b](#)]. This confirms that the revised level of growth for PWeC is able to fully fund the Colts Hill Bypass as well as all the other necessary elements of infrastructure which are required and are also detailed within this updated assessment. The funding would be equalised across the Strategic Sites and applied on a per dwelling basis to ensure the bypass is able to come forward when needed.

12. In order to ensure the robustness of this viability testing the Council are in the process of refining the Colts Hill Bypass costs with the Council's consultants, which the Council anticipates will be published shortly. However, the viability testing incorporates a level of flexibility which has been built in to take account of variance in actual costs. The Council therefore does not consider this will alter the viability position regarding the Colts Hill Bypass.
13. In terms of delivery, the Council has liaised with KCC Highways regarding this matter, and it is anticipated that this would be a KCC managed project given its nature forming part of the local road network. Having said that, the Council (TWBC) would play a role in this and to assist in the process, particularly with regard to necessary CPO. The Council also aims to create a Development Delivery Board to support the delivery of the Strategic Sites, and the related infrastructure measures. This would provide a forum to bring stakeholders together, ensure deadlines/triggers are met and that the developments are brought forward in a timely manner consistent with the aims of the local plan.
14. In terms of timescale for delivery, the SWECO Strategic Transport Assessment Report reports that the Badsell Road roundabout would experience capacity issues from 2029 (but this would not reach 'hotspot' criteria. Given that this is closely linked to the Colts Hill roundabout (in that the upgrade scheme is committed, but not currently deliverable by KCC and the Colts Hill Bypass scheme would provide an alternative design to come forward), the Bypass could come forward around this point also. Consistent with a monitor and manage approach, the two schemes (Badsell Road roundabout and Colts Hill Bypass) could be delivered separately if evidence suggests at that time, although would likely to subject to the same CPO process for completeness and again to aid a timely delivery.

15. The Council is confident that the Colts Hill Bypass is able to be fully funded by the Strategic Sites and delivered when needed to ensure the impacts caused by the proposed growth are suitably mitigated and enhancements to the highway network are provided.

Inspector's Question 3: [re. Effects of the Colts Hill Bypass on landscape and heritage]

What effect will the proposed Colts Hill Bypass have on the setting of the High Weald AONB, landscape character and heritage assets? How have these factors been considered as part of the preparation of the Plan?

TWBC response to Question 3

Introduction

16. There is some crossover between this question and the Council's answer to Matter 3 : The Strategy for Tudeley Village - Issue 3 : Wider Infrastructure Provision Q4 [\[TWLP/125\]](#) which also asked about landscape and AONB matters in relation to the Colts Hill Bypass and which was further discussed on day 2 of the Stage 3 hearings. The Council's answer to that question should then be considered alongside this answer.
17. It should be noted that in comparison with the Five Oak Green Bypass, the Colts Hill Bypass is much shorter,.
18. The length of the Colts Hill Bypass necessary for this Local Plan is a very short part of a much longer bypass safeguarded under Policy TP6 of the Submission Local Plan and avoids crossing a major water course in Flood Zone 3 and is sited well beyond buffers to ancient woodland .The safeguarded route for the A228 has been in the 2006 Local Plan, the 2010 Core Strategy and the Site Allocations DPD 2016 and as explained in the supporting text for TP6 (para 6.580) is included within the KCC Highways Transport Plan 4: Delivering Growth Without Grid Lock 2016-2031 as a cross district priority with wider economic and transport benefits.
19. A further significant factor relevant to the Colts Hill Bypass is the relationship with the northern roundabout which is at the intersection between the B2017 and the A228. As explained in hearing statement for Tudeley (Matter 3: The Strategy for Tudeley Village Issue 3: Wider Infrastructure Provision page 12 paragraph 29 [\[TWLP/125\]](#)) KCC Highways have a committed scheme to improve this junction which has stalled but which the proposals for the Colts Hill Bypass in the Local Plan can help unlock.

Consideration

20. The web site for the Local Plan examinations lists three more recent documents specifically referencing the Colts Hill Bypass:
- [PS_050](#) RAG Assessment - Access and Movement - Colts Hill Bypass
 - [PS_051](#) Colts Hill Bypass Green Belt Assessment
 - [PS_052](#) Zone of Theoretical Visibility Colts Hill Bypass
21. PS_052 Zone of Theoretical Visibility Colts Hill Bypass effectively superseded PS_050 RAG Assessment - Access and Movement - Colts Hill Bypass as it combined the original RAG assessment with the additional Zone of Theoretical Visibility material. In error the original PS_05 document has been overwritten during the uploading of documents, so they are now the same. Hence all references in this statement to the RAG Assessment refer to document PS_052 Zone of Theoretical Visibility Colts Hill Bypass which contains an assessment of the bypass on:
- The setting of the High Weald AONB
 - Listed Buildings
 - Landscape features and ecology
 - Landscape Character and Historic landscape Character
 - Public Rights of way
 - Peoples views from Roads, dwellings and edge of settlement.
22. The assessments are based on a sketch scheme in the RAG Assessment prepared by highway engineers (Figure A page 1) which includes the committed works to the roundabout on the A228/B2017 junction. In addition, the RAG Assessment includes an indicative scheme of mitigation (Figure B) to assist with the visual assessment.
23. The Zone of Theoretical Visibility (ZTV) is based on a sound methodology and a high level of detail using Lidar data and specialist software (section 1.4 page 1). As the RAG assessment explains the visual effects are likely to be “*less that indicated on the*

preliminary ZTV plans” due to additional vegetation not picked up in the model (paragraph 1.4.7 bullet point 3).

24. The ZTV plans (Figure 001 to 004) show the likely extent to which the scheme may be visible by people on the ground (1.7m) and the difference the presence of high sided vehicles would make (scheme plus 4.5m). It can be seen from the plans where mitigation has been added that effects would be greatly reduced and that for most viewers and most vehicles the scheme would be almost imperceptible (figure 003).
25. The conclusion within the RAG Assessment is for Peoples Views and Public Rights of Way is that subject to mitigation effects are likely to reduce to no significant. A summary of the assessment under other headings is given below.

The setting of the High Weald AONB

26. The ZTV illustrate that the scheme is essentially in the setting of but outside the designated AONB. The RAG assessment under this heading does however acknowledge the high visual sensitivity and the need for mitigation and then concludes that *“appropriate mitigation would reduce the residual magnitude of adverse effects, such that significant adverse effects upon the setting of the HWAONB and upon people’s views from within a very limited area of the HWAONB would reduce to not significant after mitigation”*.

Listed Buildings

27. The RAG assessments notes the Listed buildings within close proximity to the route and the need for mitigation and concludes that “in the long term”, significant effects are likely “to reduce to not significant after mitigation”.

Landscape features and ecology

28. The RAG Assessment records the presence of sensitive landscape features but notes that the route avoids effects on the ancient woodland and the scope for mitigation to reduce any adverse effects. Whilst noting the potential for landscape and visual effects to reduce to not significant after mitigation it goes on to say that there is scope *“for both Biodiversity Net Gain and environmental net gain”*.

Landscape Character and Historic landscape Character

29. Mitigation measures are identified within the RAG assessment such that through detail design those measures could be in keeping with Landscape Character such that “*there is potential for significant landscape and visual effects to reduce to being not significant*”.
30. Overall the Council is in agreement with these assessments and believe that they are sufficient at this stage of plan making to have confidence that matters have been properly considered and adverse effects can be reduced to an acceptable level.
31. Further confidence in the acceptability of the scheme may be derived from the Colts Hill Bypass Green Belt Assessment [[PS 051](#)] which concluded (paragraph 4.4) that “*the overall impact of the introduction of the proposed bypass on the adjacent Green Belt will be Negligible*”.
32. The scheme delivery will of course need to have regard for the policies within an adopted Local Plan which include all the matters set out within the RAG Assessment including the setting of the AONB, landscape character and built heritage.

Conclusion

33. Given the history and existing need for the longer bypass, including the larger roundabout at the A228/B2017 junction, it is then possible that with or without growth at Paddock Wood envisaged by the plan that the bypass will come forward within the life of the plan and including the smaller section that is proposed within the Local plan can only assist in bringing the longer scheme forward.
34. The RAG assessment and in particular the ZTV demonstrate the limited environmental effects likely to arise as a result of the construction of the bypass and the degree to which the scheme may be successfully mitigated to avoid significant adverse effects.
35. Whilst not a landscape qualitative matter further comfort may be taken from the Green Belt assessment as to the limited effects the bypass will have.
36. The Council are of the view that the evidence referred to above is sufficient at this stage of plan making and note that any scheme that comes forward will be subject to detail design that will have to have regard to environmental legislation and guidance in force

at that time including any adopted Local plan which does contain policies in relation to the designated area of AONB, Landscape Character and built heritage.

Inspector's Question 4: [re. Justification for removal of Five Oak Green Bypass and not Colts hill Bypass]

What is the justification for suggesting the removal of the Five Oak Green Bypass from the Plan, but not the Colts Hill Bypass?

TWBC response to Question 4

Introduction

37. The Development Strategy Topic Paper Addendum [[PS_054](#)], within para 3.39, refers to the interlink that would occur between Tudeley Village and the growth at PWeC (if both were to be delivered as per the full growth strategy) as a result of the siting of the larger secondary school provision at Tudeley and the larger sports facilities in the form of the Sports Hub, being placed at Paddock Wood and east Capel. The Council's evidence supports this which concludes the Five Oak Green bypass is required to alleviate issues caused by strategic development at Tudeley Village. This point is also set out within the Council's hearing statement for Matter 3, Issue 2 (Five Oak Green Bypass). As such, the Five Oak Green Bypass is not required to support strategic development at PWeC.
38. The position concerning the highway need for the Five Oak Green Bypass is set out within the Council's Hearing Statement for the Stage 2 hearings (Summer 2022) (Document Reference: [TWLP/022](#) (Matter 6, Issue 1, Question 17, para 160) which states that the Five Oak Green Bypass would not be an essential requirement for the Paddock Wood and land at east Capel Strategic Sites as other routes would exist to gain access to the A21 and Tonbridge.

Consideration

39. The Strategic Site Masterplanning and Infrastructure Report [[CD_3.66](#)] sets out the Infrastructure Framework necessary for the different scenarios for the strategic growth. In regard to a Paddock Wood and land at east Capel only scenario it identifies a potential Colts Hill Bypass and other main road infrastructure requirements (Table 13) but it does not include reference to a Five Oak Green bypass.
40. The revised growth strategy for the Strategic Sites 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.

41. 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 of that document which incorporates the Colts Hill Bypass but not the Five Oak Green Bypass.
42. This level of reduction in the growth proposed, has resulted in lower overall highway impacts. Highway impacts would still occur through Five Oak Green village as a result of the Paddock Wood and east Capel developments, and they would be expected to contribute towards traffic control/ traffic calming in order to deal with these impacts. KCC Highways also agree with this mitigation approach following discussions on this matter. The demand is not of a significant level to justify a major expansion in link capacity or a new link road such as the Five Oak Green bypass that was previously considered in the Submission Local Plan.
43. Overall, the further work on the revised growth strategy for Paddock Wood and east Capel and the associated highway modelling discussed above, demonstrates that this level of growth is capable of being delivered without the need for a bypass of Five Oak Green but will require the Colts Hill Bypass to be implemented. Highway mitigation measures would be delivered within the existing route through Five Oak Green, funded by the strategic sites, which would be sufficient to mitigate the congestion caused.

Inspector's Question 5: [re. Reliance upon modal shift when considering future highway network impacts]

In what ways does the evidence base rely on modal shift when considering likely future impacts on the highway network? Is the Plan justified by appropriate supporting evidence?

TWBC response to Question 5

Introduction

44. The Development Strategy Topic Paper Addendum [[PS_054](#)], within section 5.0 discusses the transport matters relative to the proposed growth strategy. This sets out a paragraphs 5.1 to 5.3: -

The Pre-Submission Local Plan was supported by a Transport Assessment, March 2021 (CD 3.114). This was later supplemented and updated, by Local Plan – Transport Assessment Addendum 2, October 2021 [PS-023], which included sensitivity testing sought by Kent County Council (as the local transport authority) and National Highways.

Both Transport Assessments used 'Trip End Model Presentation Programme' or TEMPro Version 7.2, (being that generally used for strategic transport modelling for local plans) for estimating background traffic growth. For the strategic sites, a 10% reduction in baseline (TRICS) trip rates was applied, in recognition of the scope for internalised and sustainable trips for such developments with ready access to facilities, such as primary school, local centre etc., as well as good provision of walking and cycling routes within them.

In addition, with the agreement of the national and county highways bodies, a 10% reduction on car (driver) trips with origins and destinations within an area regarded as a "Sustainable Transport Zone" (STZ) was also applied. This is the roughly triangular area from Tonbridge - Paddock Wood - Royal Tunbridge Wells (although the 10% reduction was not applied to trips contained within Tonbridge).

45. The justification for this was the strong focus on additional sustainable transport measures proposed as part of the strategic development sites at Tudeley Village and Paddock Wood, as well as those contained in a new 'Local Cycling and Walking

Infrastructure Plan' (LCWIP). In addition, the Tunbridge Wells Bus Service Feasibility Study and other improvements that will be introduced through the Kent-wide Bus Service Improvement Plan (BSIP) were considered.

Consideration

46. The revised growth strategy for PWeC has also incorporated further work on the transport modelling evidence in order to ensure consistency as well as a robust approach. Fundamentally, the approach to the further modelling remains the same as previously and has been reviewed and updated, as set out in the recent Tunbridge Wells Stage 1 Technical Note [[PS_047](#)] produced by consultants Sweco on behalf of the Council.
47. In regard to modal shift specifically, the Council has been in discussion with both KCC Highways and National Highways regarding the topic and in response, the Council's consultant, SWECO, has created a modal shift analysis report for completeness.
48. This report is attached to this hearing statement at Appendix 1 (Modal Shift Analysis Technical Note April 2024), and combines evidence from three core sources: -
 - Tunbridge Wells Local Plan - Background Note for Revised Strategy: Provisions for sustainable and active travel, especially for major development sites, and the implications for transport modelling. Issued October 23rd 2023 and written by Tunbridge Wells Borough Council.
 - TW LP Stage 3 Technical Note: National Highways Response. Issued October 23rd 2023 and written by Sweco.
 - Stage 3 Part 1 TN Modal Shift Proposal Final 11.09.2023 Final. Issued 12th September 2023.
49. For the revised strategic proposals for PWeC, the impact of such measures was previously estimated to equate to a 10% reduction in car trips. While the revised strategic growth at PWeC is being reduced in scale, the range of internal trips are expected to be at least the same if not more, as the focus on local services and facilities is retained and secondary school needs are now being met within the town. The earlier commitment for a strong network of footpath and cycle routes both within the new developments and connecting them to key destinations is also retained.

50. In addition, further work has been done to develop a bus strategy for PWeC with a new focus on significantly increasing bus use for trips to/from the strategic development areas. The proposal for a “town bus” can play a key role in promoting modal shift for existing built-up areas as well as the strategic sites, particularly in relation to facilitating rail trips from Paddock Wood.
51. Through this further analysis on modal shift and the points highlighted above, the Council are confident that a reasonable modal shift can be achieved. Section 8 of the Modal Shift Analysis Technical Note, discusses the modal shift impact upon the highways modelling and records a 5% reduction in car trips travelling within and between Paddock Wood, Pembury, Royal Tunbridge Wells, and Tonbridge.
52. The overall impact of applying the modal shift on the total car trip generation for the area sees a reduction for Paddock Wood of 9% in the High scenario. The Low and Medium scenarios result in 4% and 6% level of reduction respectively. The High reduction is in line with the previous 10% modal shift assumption for the Strategic Sites as part of the Submission Local Plan.
53. The Council consider this is reasonable and achievable for the Strategic Sites at PWeC. This is consistent with the guidance within the Department for Transport (DfT) Circular 1/22 and shows a proactive approach to delivering a more sustainable community.

Inspector's Question 6: [re. What strategic highways improvements will be needed as a result of the growth around Paddock Wood, where and when?]

Is it sufficiently clear to users of the Plan what strategic highways improvements will be needed as a result of the growth proposed around Paddock Wood, where and when? Is the Plan (as suggested to be modified) justified and effective in this regard?

TWBC response to Question 6

Introduction

54. The Strategic Site Masterplanning and Infrastructure Report [[CD 3.66](#)] sets out the Infrastructure Framework necessary for the different scenarios for the strategic growth. In regard to a Paddock Wood and land at east Capel only scenario it identifies a potential Colts Hill Bypass and other main road infrastructure requirements (Table 13) but it does not include reference to a Five Oak Green bypass.
55. The revised growth strategy for the Strategic Sites 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.
56. 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

57. 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.
58. 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.

59. 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.
60. 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.
61. Through both the updated Infrastructure Schedule and the IDP (as part of the main modifications process), 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.

Appendices

Appendix 1: Modal Shift Analysis Technical Note

See separate document TWLP_137_Appendix 1 - Modal Shift Analysis Technical Note