

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 3: The Strategy for Tudeley
Village**

Issue 3: Wider Infrastructure Provision

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Matter 3 – The Strategy for Tudeley Village

Issue 3 – Wider Infrastructure Provision

Inspector’s Question 1: [re. Sports and Education Facilities]

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.

TWBC response to Question 1

Introduction

1. In regards to sports provision, the Strategic Sites Masterplanning and Infrastructure Study 2021 [[CD 3.66a](#)], which formed part of the Council’s evidence for the Submission Plan (SLP), highlighted that the Infrastructure Delivery Plan sets out a list of indoor and outdoor sport and recreational items that are needed for the expansion at Paddock Wood and east Capel.
2. The SLP sets out in policy STR/SS 1 a new sports and leisure hub, which could incorporate an indoor 25m swimming pool and indoor and outdoor sports facilities. Around 10 hectares of land was also to be safeguarded within the western parcel, to the south of the railway line and to the east of the A228 for this purpose. This positioning also allowed these facilities to provide for much of the sporting needs of Tudeley Village (particularly with regard to indoor sports facilities).
3. In regard to education provision, both Tudeley and Paddock Wood and east Capel would have incorporated primary school provision to serve the individual growth areas. For secondary school provision, Tudeley would have accommodated a new secondary school which would have provided for the majority of the secondary needs of all of the Strategic Sites. At Paddock Wood, an expansion of Mascalls Academy secondary school was also proposed to provide an enhancement within the settlement to assist in

meeting the need. These provisions are set out within the Submission Local Plan, for Paddock Wood [[Map 28, on page 150](#)] and for Tudeley [[Map 32, on page 161](#)].

Consideration

4. With the removal of the Tudeley Village allocation, the revised strategy for the proposed strategic sites growth at Paddock Wood and east Capel, involving the need to maximise housing growth on the safest land in Flood Zone 1, resulted in a reduction of 918 dwellings, with up to 2,532 dwellings overall still being delivered. As such, by virtue of this reduction, the need for the flood zone 1 land for housing growth and the need to provide a new secondary school, there is a need for a different strategy to deliver sports and recreation infrastructure and education infrastructure. This is set out within the Strategic Sites Masterplanning Addendum [[PS 046](#)].
5. Firstly in terms of sports provision, further work has been carried out by the Council's consultants within the above report [[paras 3.15 to 3.30](#)], which aims to provide improvements to existing facilities as well as new provision of outdoor sports facilities within the growth sites. This approach balances the need for sports provision improvements, whilst still providing appropriate land for residential development that will deliver these improvements and provide financial contributions.
6. With the significant reduced level of housing growth, it is reasonable that there is some reduction in the overall level of sports provision that would be provided and the Masterplanning Addendum report outlines a high-level appraisal of how sport facilities could be provided. This comprises an upgrading of the existing indoor facilities at Putlands Sports and Leisure Centre (including the potential for a swimming pool), together with new outdoor provision provided by a mix of a new location within the south western parcel and intensification of existing sites. [[paras 3.18/3.19, Table 1](#)].
7. Concept work was carried out as to the likely space requirements at the envisaged locations for both indoor and outdoor provision including an example of how the individual pitches and other facilities could be accommodated [[pages 25/27, figures 11/12](#)].

8. The Masterplanning Addendum report demonstrates that an appropriate level of sport and leisure provision can be accommodated within Paddock Wood and east Capel which continues to provide the majority of provision set out in the Submission Local Plan with the removal of the Tudeley allocation.
9. For education provision, the Strategic Sites Masterplanning Addendum [[PS 046](#)] maintains the location for primary school provision within Paddock Wood and east Capel from the Submission Local Plan, with one facility provided to the eastern and western sides of the settlement. However, for secondary provision, new options are necessary with the loss of a new secondary school within Tudeley. The Council liaised with KCC (Kent County Council) as Local Education Authority, with regard to the level of school provision needed for the reduced level of growth for the Strategic Sites (i.e excluding Tudeley), which was confirmed at 3FE. The Masterplanning Addendum report [[PS 046](#)] sets out two options to accommodate this: -
- Firstly, an expansion of the existing secondary school (Mascalls Academy) in the south of Paddock Wood. There are some challenges involved in this with regard to the scope of any expansion, land requirements and the delivery of the expansion while the school remains operational. Additional land to the south of the school has been proposed for school expansion by a developer as part of a current housing planning application for the Strategic Site in the south eastern parcel (Planning App [23/00086/HYBRID](#)). Whilst the specific land in question may not itself accommodate school buildings, it allows flexibility within the school site to create opportunities to provide the necessary built facilities. KCC is not the Admission Authority for Mascalls Academy and has no legal interest in any of the land and property at the school. The existing school may not have been constructed with expansion in mind and any expansion will need to meet current space standards for learning space. However, the Council has been in discussion with the Leigh Academy Trust, who operate the Mascalls Academy, who support the potential expansion of Mascalls School and are open to continuing discussions regarding the potential opportunities for the modernisation of the school. A feasibility Assessment is currently being undertaken to review the potential for Mascalls Academy to be able to

accommodate the 3FE expansion necessary to meet the needs of the housing growth from the Strategic Sites.

- The second option comprises a new school within the north western parcel. Following discussions with KCC, it is understood that a new facility would need to comprise land sufficient for a 6FE secondary school and its associated land for recreation etc (to ensure that some level of future proofing is embedded/capability to expand). KCC have confirmed that a 4 FE Secondary School can be delivered and be operational at that size which is the minimum, and then expanded at a later date from further growth anticipated beyond the 10 year period into a 6 FE (the minimum size secondary school that KCC would ultimately deliver). In this scenario, the 3 FE growth needed from growth at PWeC would be met by developer contributions and the remaining funding gap up to 4 FE would be met by the Education Authority to central government funding. It is also possible that further developer contributions for secondary provision are received by KCC Education from developments outside of TWBC Borough, but within the education area which could meet the 1FE gap.

10. The Strategic Sites Addendum report' [\[PS_046\]](#) (paras 3.2 – 3.14) has reviewed how a new secondary school could be delivered within the north western parcel whilst having regard to and respecting the flooding extents from the updated flood assessments. Sufficient land is shown within the Structure Plan in the report for how a new secondary school could be delivered together with its associated land (figure 4, page 16). The Structure Plan also includes land to accommodate an expansion of Mascalls Academy and shows both sites to be safeguarded for such purposes which is also reflected within the revised policy wording for the Strategic Sites policy STR/SS1. It is expected that an updated position regarding the Mascalls Academy feasibility assessment could be provided within later Hearing Statements relative to Matter 4, The Strategy for Paddock Wood, Issue 2.

11. With regard to other elements of infrastructure necessary for the Strategic Sites, significant additional work has been undertaken to review the infrastructure requirements of the revised growth strategy for Paddock Wood and east Capel. This includes highways infrastructure, sustainable modes and public transport to ensure

that the appropriate measures are incorporated relative to the revised growth and it is also deliverable.

12. For health, the Council has continued discussions with the NHS Integrated Care Board concerning the revised level of growth and how this could be served by health infrastructure locally, as well as any necessary wider enhancements. It is anticipated that enhancements to GP services would be needed within the growth area and this will be the subject of further discussions in terms of specific space requirements etc. Pharmacy services are also likely and both could be sited within the local centres, of which there are three (south western parcel, north western parcel and south eastern parcel), which will be well placed to accommodate local infrastructure, embedded within the communities which they serve.

Conclusion

13. Overall, the Council consider that the necessary infrastructure will be provided for the revised growth strategy for Paddock Wood and east Capel with the deletion of the allocation for Tudeley Village. Infrastructure delivery will be discussed in more detail within later Hearing Statements relative to The Strategy for Paddock Wood, in particular Matter 4, Issue 2, Issue 3, Issue 4, Issue 5 and Matter 7, Issue 1.

Inspector's Question 2: [re. Highway infrastructure for B2017]

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?

TWBC response to Question 2

Introduction

14. The Development Strategy Topic Paper Addendum [\[PS 054\]](#) sets out that further transport modelling has been carried out as part of the work on the revised strategy for the Strategic Sites.

15. This comprises the Tunbridge Wells Stage 1 Technical Note [\[PS 047\]](#) and includes:
 - Review of robustness of the Baseline 2019 model in the wake of the Covid-19 pandemic and how flows within the model relate to observed data in 2022.
 - Assessment of NTEM/TEMPro 7.2 housing and growth factors against NTEM/TEMPro 8, and update of Local Plan reference case model as required.
 - Review of Paddock Wood zone loading to confirm accuracy in key junctions where traffic flows will be loading onto the network.
 - Review of the wider road network surrounding the wider Paddock Wood area. These reviews primarily focus on the congestion, demand and routing around Paddock Wood and Kippings Cross, and identified existing committed transport schemes (both pre-existing and those that have come forward since the original model), based on planning permissions as of August 2023.

16. Two further stages of modelling were carried out, Stage 2 [\[PS 048\]](#), assessed hotspots junctions within the network based on the proposed growth scenarios (without mitigation or any reduction to accommodate reduced traffic flows based on the use of sustainable modes of transport) and Stage 3 [\[PS 049\]](#), regarding model shift impact reporting (assessed the respective reduction in traffic flows based on sustainable transport assumptions).

Consideration

17. The outcomes from the Stage 3 modelling shows the following junctions of the B2017 as a 'major hotspot' where location specific mitigations would be needed to assist in easy congestion issues here and improving traffic flow.

- A26 / B2017 Tudeley Road (Somershill Roundabout)
- A228 / B2017 (Badsell Roundabout)

18. Since the publication of the Stage 1, 2 and 3 Highways Modelling Technical Notes referenced above, further more detailed modelling has been carried out as outlined within the SWECO - Strategic Transport Assessment – Modelling Appraisal (18/04/2024) (**Appendix 1**). The report provides the conclusions regarding the strategic modelling appraisal of the revised Local Plan growth scenario, setting out the key outcomes of each stage of the modelling within a single document. It also details the outcomes of the Stage 3 Part 2 modelling, together with the final conclusions of the strategic transport modelling appraisal.

19. For the B2017 at Five Oak Green, the report concludes at section 5.2.2 (page 23), that: -

“whilst data analysis shows that congestion rises along the B2017 through Five Oak Green link in the Local Plan scenario, the demand is not seen as being of a 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”.

20. The report goes on to outline the implementation of enhanced traffic management through the area to better support the flow of vehicles could be provided. In support of this, enhanced infrastructure for people walking, wheeling and cycling should be incorporated to support more sustainable travel along this link.

21. Mitigation schemes, in the form of junction upgrades, are outlined within the report for both the A26 / B2017 Tudeley Road (Somershill Roundabout) and A228 / B2017 (Badsell Roundabout) at sections 5.4 and 5.6 respectively.

22. Given that the above junctions were highlighted as 'hotspots' within previous modelling outputs (and as part of the modelling informing the Submission Local Plan), the Council were able to incorporate potential mitigation schemes here and associated high-level costings at an early stage. This has been incorporated within the wider summary of necessary highways infrastructure and was included within the updated viability work undertaken by the Council's consultant [[PS 061a](#)]. This work assessed the revised growth strategy with the necessary infrastructure etc and concluded no overall change in the viability assessment findings.

Conclusion

23. The Council is, therefore, confident that the necessary highway infrastructure along the B2017 is deliverable and viable. Further discussion on this matter will be provided within later Hearing Statements relative to Matter 4, The Strategy for Paddock Wood, Issue 4, and Matter 7, Highways Infrastructure, Issue 1.

Inspector's Question 3: [re. Wider upgrades including the Colts Hill Bypass]

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

TWBC response to Question 3

Introduction

24. The Development Strategy Topic Paper Addendum [\[PS_054\]](#) sets out that further transport modelling has been carried out as part of the work on the revised strategy for the Strategic Sites as discussed in the response to Question 2 above. This is in the form of Stage 1, 2 and 3 Highways Modelling Technical Notes and as such, the Council has reviewed the highways impacts relative to the updated growth position.

25. Further more detailed modelling has been carried out as outlined within the SWECO - Strategic Transport Assessment – Modelling Appraisal (18/04/2024) (**Appendix 1**). The report provides the conclusions regarding the strategic modelling appraisal of the revised Local Plan growth.

Consideration

26. Through the conclusions of the updated transport modelling, the Council has been able to assess and compare the level of required mitigations to the Submission Local Plan. The main hotspot areas are broadly similar due to the characteristics of the highway network, and as such many of the highway mitigation schemes also apply to the revised growth strategy. As such, a wider summary of necessary highways infrastructure (including a revised scheme for the Colts Hill Bypass which is discussed later in this statement), was created and included within the updated viability work undertaken by the Councils consultant [\[PS_061a\]](#). As discussed above, this work assessed the revised growth strategy with the necessary infrastructure etc and concluded no overall change in the viability assessment findings.

27. Whilst a significant portion of the growth previously proposed within the Submission Local Plan is now proposed to be removed as part of the revised strategy pending an early review, there is a sufficient level of growth to ensure that the wider necessary upgrades to the highway network can be delivered when needed.
28. In respect of the Colts Hill Bypass (CHB), further work has been carried out to review this element of infrastructure in the context of the revised growth strategy for the Strategic Site at Paddock Wood and land at east Capel (STR/SS 1). This comprises revised road trajectory and revised onward connections to Alders Road/Crittenden Road. In addition, amended design of the scheme was also possible by virtue of the removal of the Five Oak Green Bypass from the revised growth strategy which has allowed amendments to the positioning of a proposed roundabout linking Colts Hill with Alders Road. This is shown at Figure A, Page 1 of STANTEC - RAG Assessment, Access and Movement Report [[PS_050](#)].
29. Revised envisaged cost estimates have been undertaken which also show a significant reduction in delivery costs for the CHB, as a result of the alterations made to the proposed scheme. In addition to this, and through discussions with Kent County Council as Highways Authority, the delivery of the committed upgrade scheme to the A228/Badsell Road junction (which has experienced difficulties in delivery), can now be unlocked through the delivery of the CHB (which necessarily links to it and provides a further enhanced upgrade solution).

Conclusion

30. In conclusion, the Council considers that the revised growth strategy is able to deliver the necessary wider upgrades of the highway network, including the Colts Hill Bypass. Further discussion on this matter will be provided within later Hearing Statements relative to Matter 4, The Strategy for Paddock Wood, Issue 4, and Matter 7, Highways Infrastructure, Issue 1.

Inspector’s Question 4: [re. Landscape character, ANOB, and Green Belt considerations for Colts Hill Bypass]

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?

TWBC response to Question 4

Introduction

31. The Inspector, at para 27 of his Initial Findings letter, made comments regarding the potential visual impact of the of the Five Oak Green Bypass upon the Green Belt and AONB.
32. In response to the Inspector’s Initial Findings, and particularly given the close spatial relationship between the Five Oak Green and Colts Hill Bypass roads, the Council commissioned a Colts Hill Bypass Green Belt (GB) Assessment [[PS_051](#)], in order to provide a further level of assessment of the potential Green Belt harm associated with the introduction of the proposed Colts Hill Bypass.
33. A separate study relating to the AONB, Landscape and Visual impact relative to the Colts Hill Bypass was also undertaken comprising the (RAG) Assessment, Access and Movement – Colts Hill Bypass [[PS_050](#)], and a Zone of Theoretical Visibility (ZTV) Colts Hill Bypass study [[PS_052](#)].

Consideration

34. The GB report [[PS_051](#)] assesses the potential for harm and whether the proposed bypass would have the potential to reduce openness and conflict with purposes of the Green Belt. This follows a clear methodology and including the review of five interrelated elements. At Chapter 3, the report considers the contribution of the site to GB purposes. It is found that :-
- “The introduction of the proposed bypass would not weaken the contribution of any adjacent land to the Green Belt Purposes. Whilst the land to the east of the site would become contained between the proposed bypass and the existing

A228 corridor, this would not weaken the land's distinction from the urban areas or affect its relevance to any Green Belt Purposes. There would be a loss of openness along the road corridor itself, including through the introduction of traffic, although this would not be considered to reduce openness of adjacent land. A road, whilst not appropriate development, is not the same as an urban area. There are numerous examples of main roads within Green Belts that run through land with a strong distinction from urban areas, and therefore make a Strong contribution to Purpose 3. 3.15 As it rises up Colts Hill the A228 follows a ridge which, along with the associated tree cover, creates a strong Green Belt boundary, so the creation of a new road within the Green Belt to the west will not significantly weaken this existing boundary. Adjacent to the northern end of the proposed bypass route the existing Green Belt boundary is currently weak, as it doesn't follow any defined physical features, so the introduction of the new road would not have any material adverse impact on this. 3.16 The overall level of impact on adjacent Green Belt resulting from the introduction of the proposed bypass will be Negligible".

35. In concluding on the harm caused, the report outlines at para 3.17 that the site (as defined in paragraph 3.6) makes a strong contribution to safeguarding the countryside from encroachment. The impact of the bypass itself would be negligible, and so bearing both conclusions in mind, the overall harm for Green Belt purposes would be moderate. Mitigation can also be delivered here to lessen the effects on the impact on the openness of the adjacent Green Belt which is capable of including woodland belts, sympathetic land form and planting appropriate to local landscape character. As such, the Council consider this element of the revised growth strategy is justified in respect of the GB.

36. With regard to AONB, Landscape and Visual impact relative to the Colts Hill Bypass, this is assessed through the RAG Assessment [[PS 050](#)] which uses a red, amber, green methodology to assess the landscape and visual impact matters.

37. In respect to the AONB, the report outlines (section 2.1) [[PS 050](#)] that visual receptors have a high visual sensitivity and that mitigation would be required. An appropriate

scheme is capable of including sympathetic land forming, additional landscape planting and topography tie in to lessen any impacts.

38. In respect to Listed Buildings, there are two within the proximity of the proposed bypass and their settings have a high sensitivity. However, mitigation in the form of tree retention (which would screen key views) along with the introduction of additional landscaping would reduce the magnitude of effects (section 2.1) [\[PS_050\]](#).
39. In regard to landscape features ecology, high to medium sensitivity is concluded. The current high level design shown at Figure A, Page 1 of STANTEC - RAG Assessment, Access and Movement Report [\[PS_050\]](#) including the Preliminary Zone of Theoretical Visibility (ZTV) which shows the alignment of the bypass avoiding direct effects upon nearby Ancient Woodland and its associated buffer. Other features, including a field drain/watercourse, trees and hedgerows will be affected and so mitigation would be required. Refinement of the road alignment and geometry at the detailed stage will further reduce likely adverse effects and minimise the loss of any notable features.
40. The report considers (section 2.1) [\[PS_050\]](#) that in the long term such significant effects could reduce to being not significant through appropriate mitigation, which could include a wider land take to provide scope for both Biodiversity Net Gain and environmental net gain. This would be deliverable if needed within the land ownership extents in this area. TWBC and KCC agree to the principle of working cooperatively on Compulsory Purchase Orders, if considered necessary. The Council has factored in the timescales for CPO into the delivery of the link road.
41. There is potential for significant adverse local landscape character effects with regard to landscape character, including historic landscape character. But as above, through introduction of mitigation features outlined above, such effects could reduce to being not significant through appropriate mitigation in the long term (ZTV section 2.1) [\[PS_050\]](#).
42. In respect of public rights of way PROW, the report sets out that those routes that would be directly affected by the bypass, would have medium to high landscape

sensitivity, views from PROWs would be of high or medium visual sensitivity dependent on the visual context and visual relationship to the road itself. Mitigation measures include flexibility to any conflict with PROW so that diversion could be actioned rather than crossings of the bypass. Mitigation measures highlighted above would assist in reducing the magnitude of effects which could reduce to not significant over time (section 2.1) [[PS_050](#)].

43. Finally, in respect of views from local roads, dwellings, edge of settlements, given the land topography, spread of landscape features including trees and planting and the pattern of existing dwellings within the area, sensitivity of views would range from low to high. Again however, the mitigation measures highlighted above would assist in reducing the magnitude of effects which could reduce to not significant over time (section 2.1) [[PS_050](#)].

44. The Preliminary Zone of Theoretical Visibility (ZTV) [[PS_052](#)] mapping indicates that with mitigation the proposed bypass would have limited visibility in the sounding locality, particularly from the north in views of the High Weald National Landscape beyond the bypass location to the south. The ZTV assumes worst case scenario and indicates standard 1.7m view point and the use of the bypass with 4.5m high sided vehicles (shown at Figure B, Page 2 of STANTEC - RAG Assessment, Access and Movement Report [[PS_050](#)]).

45. Overall, the report outlines an Amber conclusion relative to the landscape and visual impact of the bypass. Given the high-level nature of the current bypass scheme and in order to address some of the effects discussed, the report recommends that a Preliminary Landscape and Visual Impact Assessment (LVIA), and a Concept Environmental Mitigation Design are carried out as well as further discussions with Kent County Council (KCC) in respect of PROW, to inform more detailed design of the bypass alignment etc. (section 2.1) [[PS_050](#)]. This is an iterative process and the further assessments recommended in the assessment would take place prior to any formal planning application to inform the final designed proposals.

46. Through this further work, there is potential that the effects discussed could be integrated in to the design and a more responsive solution could be achieved relative to the context as assessed. Further work as recommended would be implemented in discussion with stakeholders (including KCC as Highways Authority), to progress the scheme with cross party support to ensure ultimate deliverability.

Conclusion

47. Overall, the further work carried out has assessed the relevant issues in respect of landscape character, visual impact, Green Belt and AONB harm relative to the Colts Hill Bypass. The Council consider that this demonstrates that the level of harm could be effectively mitigated and that opportunities exist to refine and respond to individual effects through the next stages of assessment and scheme design. The Council therefore consider that this element of the revised growth strategy is justified.

Appendices

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

Please see Appendix 1 of the Council's response to Matter 3 Issue 1 for this document.