

**Tunbridge Wells Borough Local Plan Examination Stage 3
Hearing Statement prepared on behalf of Hadlow Estate (hereafter referred to as “The Estate”)
Matter 3 - The Strategy for Tudeley Village**

Issue 1 – Location and Accessibility

Q1. How does the additional information produced since the Stage 2 hearings address the Inspector’s Initial Findings around the effects of the allocation on Tonbridge town centre and relevant ‘hotspots’ on the highway network? Could potential impacts be cost effectively mitigated to an acceptable degree and would the residual cumulative impacts be severe?

The additional information produced since the Stage 2 hearings around effects of the allocation on Tonbridge town centre and relevant ‘hotspots’ confirm that any such impacts can be effectively mitigated without unacceptable residual cumulative impacts, let alone severe impacts.

Document PS_023¹ describes the modelling and mitigation of all the hotspots identified in the traffic analysis; it contains further Sensitivity Tests with highly robust traffic modelling. The report identifies appropriate mitigation schemes and concludes that with this mitigation residual cumulative impacts will not be severe.

In respect of Tonbridge town centre in particular, five ‘congestion hotspots’ were identified in Document PS_023¹ with this assessment, including the development at Tudeley Village. These hotspots are listed in the Document PS_023 at Table 3-5 and are also reproduced in Figure 4.1 of the Markides Associates Technical Note responding to the Inspector’s Initial Findings².

Document PS_023 showed that, when assessing the results of the modelling **without considering any of the inevitable trip internalisation that would be expected with the developments in question**, and when comparing the ‘Reference Case’ to the ‘Mitigation Scenario’ (which assumes several physical interventions including a signal scheme at the A26 Hadlow Road East / Three Elm Lane junction in Tonbridge and an overall 10% modal shift in the Sustainable Travel Zone), three of the five ‘hotspots’ were found to operate **better** than in the ‘Reference Case’. A further junction is demonstrated to operate only marginally above the ‘Reference Case’ result, but is still operating within practical junction capacity and therefore there is no material impact, and clearly no severe impact. Only one junction (Junction 5, B2260 Quarry Hill Road / A2014 Pembury Road / A26 Quarry Hill Road), is shown to be over capacity, with a small increase on the ‘Reference Case’. However, in this context it is also clear that under the Reference Case, the junction in question is operating close to capacity and the increase with the development is very small. The evidence therefore demonstrates that even assuming no trip internalisation, the development would not create any ‘severe’ impacts on the highway network in Tonbridge town centre.

As noted above, however, assessments were completed assuming **no** trip internalisation at Tudeley and Paddock Wood. Evidence provided to the examination³ clearly demonstrates that there would be additional trip reduction as a result of trip internalisation due to the mixed-use nature of the

¹ PS_023 Local Plan – Transport Assessment Addendum 2 (September 2021), produced by SWECO

² Technical Note – Response to Inspector’s Initial Findings for Tunbridge Wells Borough Council Local Plan, Tudeley Village (April 2023), produced by Markides Associates

³ Core Document 3.66, Tunbridge Wells Local Plan: Paddock Wood and East Capel and Tudeley Village, Access and Movement Report (December 2020), produced by Stantec

proposals. As such, the results presented in Document PS_023 show an unrealistic worst-case assessment, with inevitable internalisation further reducing any impacts on capacity at these locations, further ensuring that there will be no severe cumulative impact at any of these junctions.

Given the above, it is concluded that the residual cumulative impacts at the 'hotspots' identified cannot be considered 'severe'. Moreover, development management control processes could address any residual issues.

Q2. What allowance has been made for modal shift to walking, cycling and use of public transport? Is the evidence supporting the Plan justified and does it demonstrate that the allocation could be made sound?

The primary modal shift assumption used for modelling purposes is detailed by SWECO which only assumed a 10% modal shift for locations within the Sustainable Travel Zone. This figure is evidenced by SWECO using the Department for Transport's Sustainable Travel Towns analysis.

The potential for modal shift to walking, cycling and use of public transport is outlined in several documents submitted to the examination. For example, within evidence presented by Stantec³ a modal shift from 70.9% car driver to 42.6% was considered feasible, reflecting a 40% reduction in external car driver trips. This was considered achievable through the facilitation of home working patterns at the site and material improvements to public transport facilities to offer high quality linkages as well as walking and cycling infrastructure improvements.

Within the Markides Associates response to the Inspector's Initial Findings on Tudeley², a comparison of various data sources was provided outlining the evidence with respect to buses and walking/cycling and it concluded that meaningful modal shift reductions were readily achievable, facilitating greater modal shift/trip reduction than had been used in the SWECO modelling.

The allowances used in the SWECO modelling referred to above are therefore entirely realistic and reasonable to use on a precautionary basis, but where the potential opportunity for further modal shift to be achieved by taking into account the internalisation and sustainable travel package relevant to Tudeley is highly achievable. We note that this is also supported by consideration of the location of Tudeley – it is only some 2.5 miles by bicycle from Tonbridge train station, which is highly comparable to parts of the existing settlement of Tonbridge itself, such as Higham Wood (2.3 miles). Public transport access as proposed will also be of comparable quality and accessibility to locations for growth.

In conclusion, the allowance made for modal shift to walking, cycling and use of public transport is reasonable, justified and supported by evidence and greater modal shift is in fact achievable, but the assessments do not depend upon achieving those shifts. This evidence demonstrates that the allocation relating to Tudeley would be sound on this matter.

The evidence supporting the allocation is therefore sound. In addition, the soundness of the allocation is assured by the identified requirements that will be delivered as part of the allocation. Specifically, the inclusion of the following additional item within clause 12 of draft Policy STR/SS3 – see below:

12. Secure developer contributions towards the strategic growth of this area and Land at Paddock Wood and east Capel, either in kind (normally land) and/or financial, as set out in the

Strategic Sites Masterplanning and Infrastructure Study (February 2021) Strategic Infrastructure Framework November 2020 (or a version of this document as amended), to include:

- a. highway improvements and mitigation measures, including:
 - i. on- and off-line works to the A228;*
 - ii. new highway to bypass around Five Oak Green;**
- b. provision, improvements, and enhancement to cycle routes and cycle corridors;*
- c. provision, improvement and enhancement of bus routes between Paddock Wood and Tonbridge;*
- ~~*d. primary and secondary education provision;*~~
- ~~*e. health and medical provision;*~~
- e. f. improvements and enhancement to sports and recreation provision, including children's and youth play space;*
- ~~*f. g. utility provision and upgrades;*~~
- ~~*g. h. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.*~~

The development will be delivered through the production of a Framework Masterplan Supplementary Planning Document (SPD) to guide development in respect of the garden settlement principles and creation of a new community at Tudeley Village.

The SPD will set out broad principles to show how the above policy requirements, together with other policies within this Local Plan, should be delivered on the site and will set out the phasing for delivery of the key elements and associated infrastructure. The SPD will need to ensure all elements of the proposals are considered comprehensively, following a masterplan approach. Proposals for the piecemeal development of individual sites/elements within the settlement without the comprehensive masterplan approach will not be supported.

Planning applications for development within this area should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application. Applicants will be expected to liaise with Kent County Council, adjacent local planning authorities (Tonbridge & Malling and Maidstone Borough Councils) and other consultees in the provision of infrastructure associated with the new settlement.

The Council will, if necessary, use its Compulsory Purchase Order powers to ensure the delivery of the appropriate masterplanned approach, including the delivery of infrastructure.

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?

There is not sufficient evidence to demonstrate that the expansion of Paddock Wood without Tudeley Village would remain acceptable without a bypass of Five Oak Green.

The anticipated trip impact for movements from Paddock Wood has been reviewed as part of the revised modelling process. Within the modelling review, SWECO note the following:

“Looking at where there are increases in flows on highway links around Paddock Wood when comparing the Local Plan High Modal Shift scenario with the Reference Case scenario, notable increases are forecast at the following locations:

1. Foxhole Lane (Pembury)
2. Benchley Road
3. Railway crossings east of Paddock Wood
4. **B2017 Five Oak Green**
5. Links to Horsmonden” (Page 12, PS_049 TW Local Plan Stage 3 Modal Shift Impact Reporting (September 2023 emphasis added)

Based on the modelling assessment presented, the trip distribution for Paddock Wood travelling towards Tonbridge and Capel has been outlined during the AM and PM peak periods. This indicates the following trip impact:

Origin-Destination Analysis – Paddock Wood

Time Period	Arrivals	Departures
Tonbridge		
AM Peak	289	505
PM Peak	524	305
Capel		
AM Peak	33	19
PM Peak	38	50

PS_048 TW Local Plan Stage 2 Reporting (August 2023)

The modelling document does not explain whether the above relates solely to vehicle trips or whether these trips are multi-modal. Further clarification is, therefore, required in this regard to establish the scale of impact that is being outlined.

Nonetheless, the modelling report produced indicates a strong and unsurprising demand between Tonbridge and Paddock Wood (as well as with Royal Tunbridge Wells and Paddock Wood itself). This demonstrates that the demand generated by Paddock Wood will impact Tonbridge and as a result, the associated B2017 corridor.

In respect of the capacity of the B2017, SWECO has undertaken a link capacity assessment of the road⁴, which is shown in the table below. The link capacity assessment has been conducted on the basis of the road being a UAP3 classification of 6.1m wide, which allows for one-way, hourly flows of 900 vehicles to be accommodated.

B2017 Badsell Road (Five Oak Green)

Scenario	AM				PM			
	eastbound		westbound		eastbound		westbound	
	Demand	V/C	Demand	V/C	Demand	V/C	Demand	V/C
2018 Base	282	31	416	46	512	57	331	37
2038 Ref Case	455	51	615	68	644	72	405	45
2038 Local Plan Modal Shift (LPMS)	509	57	898	100	832	92	481	53

Source: SWECO

This indicates that with the revised development strategy in place the link capacity of the B2017 may be below 100% in the eastbound (AM) and westbound (PM) direction, but for the westbound (AM) and eastbound (PM) flows, link capacity is reached or neared.

Accordingly, it is clear that the evidence demonstrates that the expansion of Paddock Wood would have an unacceptable highway impact upon the B2017 and Five Oak Green.

All of this strongly supports reversion to the Plan as previously proposed with the amendments that the Estate identified in respect of the opportunities that come with Tudeley Village’s allocation and, in any event, contributions to be made to any Five Oak Green bypass, if and to the extent that is required when Tudeley Village is delivered, from others.

⁴ PS_059 TW Local Plan Sage 3 Part 2 Outcomes (November 2023), produced by SWECO

Q2. Examination Document PS_039 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?

The findings of these studies all robustly confirm the soundness in principle of the allocation at Tudeley Village and there is no good reason for removing it.

The Council have merely asserted that there remains an unresolved risk (rather than an objection in principle) concerning the potential landscape impact of the proposed Five Oak Green (FOG) Bypass, particularly with regard to the impact upon the AONB, but no objection in principle as to its delivery has been identified, and this is obviously a matter that is capable of control through an appropriately worded policy and detailed design in principle.

The Council's position appears to be that further evidence is required to assess this issue. They rightly are not suggesting that any issues cannot be resolved through discussion. The Council's approach of removing the allocation for Tudeley Village is unsound and inappropriate.

Any requirement for further work of this type cannot be a proper basis for removal of the allocation that is so critical to meeting the Borough's housing needs. Amongst other things:

- The proposed FOG bypass is not within the AONB. There are no exceptional circumstances required in support of such a scheme. Rather, national policy will simply require that its development within the setting of the AONB should be sensitively located and designed to avoid or minimise adverse impacts. These requirements are capable of being protected by an appropriately worded policy and control in the development management process.
- Similarly, NPPF paragraph 155 confirms that "local transport infrastructure which can demonstrate a requirement for a Green Belt location" is not inappropriate development in the Green Belt.
- Finally, even if to the extent that further work is required, it is appropriate to expect this work would be undertaken at the development management stage, and it should not therefore be a reason for proposing deletion of Tudeley Village.

In summary, removal of the Tudeley Village allocation on the basis of an unresolved risk of landscape impact of the FOG bypass is unsound and inappropriate. And there is no other work that is required to be done for such allocation to occur.

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

Our understanding is that no alternative alignment routes have been considered.

If there is any residual issue regarding the alignment of the route, the matter could be addressed by the promotion of a sustainable travel strategy which reduces private vehicular movements along the B2017 corridor.

The allocation of Tudeley Village specifically allowed for the realisation of such a solution. There are several alternative mitigation strategies for the B2017 corridor which Tudeley Village could enable delivery of which could reasonably negate the need for the bypass altogether and which have not been addressed by TWBC. These include:

- The reconfiguration of the Tudeley access strategy, to focus trips towards the strategic road network via the A26.
- Development of traffic calming measures within Five Oak Green to reduce the desirability of the route and to reinforce the routing of vehicles towards the strategic road network; and
- Consideration of bus gate or priority working measures on the B2017 corridor to further emphasise and encourage bus usage.

It is entirely reasonable that such solutions can and would be addressed through the development management process and without frustrating the allocation of Tudeley Village at the Local Plan stage.

This approach would be particularly appropriate within the context of recent transport policy which seeks to further promote sustainable and active transport above the private vehicle.

None of this has been addressed by the Council in its proposed approach of postponing Tudeley Village.

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?

Examination Document PS_039 did not identify any significant issues associated with noise, safety and air quality issues in respect of the Five Oak Green Bypass.

In light of the advice set out in PS_039, the Council go on to explain in the Development Strategy Addendum Document (PS_054) that none of these issues is likely to result in significant adverse impacts.

In respect of any further detailed work, it is considered that these matters would necessarily most appropriately be addressed at the planning application stage and do not require further assessment or resolution through the local plan process.

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?

It is considered that without the Tudeley Village allocation, the Council's approach is unsound. The FOG Bypass and associated works have not been justified in the location proposed at this stage without Tudeley Village. Notably, and as stated above, alternative sustainable travel solutions for the B2017 corridor derived from the opportunity of Tudeley Village do not apply without Tudeley Village and require proper examination. Such solutions would be addressed through the development management process if Tudeley Village were to be allocated and without the need to detract from the principle of the Tudeley Village allocation.

If in due course, through this process, that alternative mitigation measures for the B2017 corridor are not sufficient with Tudeley Village, and as such that there was a need for the FOG bypass, this would provide sufficient justification to demonstrate the bypass was appropriate development within the Green Belt and this would also be relevant to considering any residual harm to the setting of the AONB as a matter of principle.

The mitigation strategy for the B2017 corridor has already been considered in sufficient detail to support and justify the allocation for Tudeley Village. The detail of that mitigation is a matter that can reasonably be addressed through the development management process and is not an issue which undermines the deliverability of Tudeley Village at this local plan stage. By contrast, the same is not true if Tudeley Village is not allocated.

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.

The answer to this question is no.

The removal of Tudeley Village prevents the delivery of necessary secondary school infrastructure, and fundamentally undermines the opportunity to deliver a sustainable active travel strategy for the surrounding area.

Secondary School Infrastructure

The Council concedes that a strategy for the provision of additional secondary school capacity without Tudeley Village has not been finalised as part of the revised development strategy, but rather options are merely presented at this point. This is unsound in principle for the Plan. This situation has only arisen as a result of the removal of the Tudeley Village allocation.

With the revised scale of growth proposed, there is still a requirement to provide three additional forms of entry (optimistically rounded down by the Council rather than up). As a result of the postponement of consideration of Tudeley Village to an early plan review, it is said that the options identified to provide this additional capacity are limited to:

- An extension of Mascalls Academy to 12FE; or
- Provision of a new 4FE secondary school to the north-west of Paddock Wood

For the first option, it is noted that the Local Education Authority (LEA) has only agreed to explore the feasibility of extending Mascalls Academy. The LEA has not confirmed support for this option. There is no likelihood let alone certainty that this is an effective strategy. Moreover, it is noted that 12FE would be a very large school, and the operational and sustainability implications of that have not yet been explored in any detail. It is also noted that the town planning feasibility of this extension has not been explored, specifically with regard to traffic and travel, but also in respect of landscape and visual impact given its proximity to the AONB. This is therefore an inherently rudimentary and speculative option which is incapable of providing a proper basis for a sound abbreviated Local Plan and again is only a product of the unsound removal of Tudeley Village.

With regard to the second option, it is noted that such a school would need to be 4FE with scope to expand to 6FE beyond the plan period. Document PS_040 confirms at paragraph 4.50 that:

“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...(and)...central government funding”.

However, no evidence is provided of the LEA or central government having any funding streams available to meet this shortfall. To have any of the requisite confidence over the delivery of this option, this funding would need to be confirmed to be available, which it is not.

Moreover, and quite apart from that, it is also noted that whilst a 4FE secondary school has a reduced pupil capacity, being 33% smaller than a 6FE school, it would not be 33% cheaper to deliver than a 6FE school. The core secondary school facilities would still be required within a 4FE school, with the only

saving being a reduction in the number of classrooms required. As such the shortfall between the developer contribution and the full cost of the secondary school could therefore be significant.

In addition, a further issue with the 4FE secondary at NW Paddock Wood is that an extension of that site would not provide a sustainable and financially viable long-term solution in any event. There is therefore fundamental uncertainty around the deliverability of the secondary school strategy now proposed, and no proper identification of sustainability, which renders this part of the plan unsound.

Limiting the options in this way to two proposals, both of which are misconceived and not properly assessed in any event, has only occurred as a result of the unjustified removal of Tudeley Village at this stage.

The proposed adoption of the Plan should reinstate Tudeley Village to avoid these problems. Without prejudice to that position, if it were to be adopted without Tudeley Village allocated, it would be essential for there to be an early plan review where the obvious and otherwise missed opportunities to deliver these facilities within Tudeley Village will have to be quickly revisited. This should be coupled with a policy that provides for Tudeley Village as a focus for growth.

Sustainable and Active Travel Strategy

With the removal of Tudeley Village from the development strategy, the sustainable and active travel infrastructure and services which were proposed to run along the Paddock Wood-Tonbridge corridor have also been removed altogether. This too is unsound. This means that the Council's revised development strategy has now had to attempt to create a revised sustainable and active travel strategy which it has clearly been unable to do.

The current proposed travel strategy for trips between Paddock Wood and Tonbridge (which accounts for a significant proportion of trip distribution – see document PS-060, figure 4.4) will now be dependent upon the existing train service, with access to the train station depending on either walking and cycling, or a new Paddock Wood circular bus service.

The circular bus route that is being contemplated would be proposed to run as a 'figure of eight' that starts and finishes at Paddock Wood Station. The service is proposed to run every 20 minutes. It is noted that the total circular journey time is 25 minutes (Document PS_041, page 8).

However, it is clear that the options for the bespoke bus service are not financially viable in terms of cost to revenue. Indeed, only Option 1a (which proposes a 20-minute frequency for the bus with a 10% bus mode share) actually shows a self-funding service by the end of the plan period. The 10% mode share for this location is indicated as being the highest of the possible mode shares with lesser figures of 3% and 5% also assessed, but it is important to emphasise that the service is not viable at these lower levels of mode share.

Moreover, the proposed bespoke figure of eight service purporting to address Tonbridge will in fact be operating within a walkable / cyclable distance of the Town Centre, so directly competing with those transport modes with reduced cost when compared with the bus service and so undermining the viability of providing such a bus service. On that basis, the service is very unlikely to achieve the required 10% mode share to offer financial viability in the long term.

It is also not clear whether the viability analysis has assumed that all of the 10% bus mode share assumed for the town will use the bespoke shuttle service; in reality a proportion of the patronage

will use other buses. Therefore, the overall level of patronage on the shuttle service is likely to sit significantly below the level required to be viable.

In the context of the proposed bespoke bus service, it should also be noted that public transport trips to the main centre at Tonbridge are much less likely to take place where a direct service is not available as there are inherent cost and journey time penalties associated with using a combination of both bus and rail to complete the journey. This is in direct contrast to the proposals at Tudeley Village, where a direct, frequent bus service with a journey of less than 4.0km (travel time of under 15 minutes) at a lower cost is proposed.

In summary, the revised active travel strategy now proposed is not viable, effective or sound. The associated level of patronage is not sufficient to support a viable circular bus service. Any shortfall in revenue made up through developer contributions will not be sustained over the long term to bridge the viability gap, with the consequences being a change to or loss of the service. The proposed adoption of the Plan can only therefore be contingent on restoring Tudeley Village. Without prejudice to that, there would have to be an early plan review where the opportunities to deliver these facilities alongside an allocation for Tudeley Village are revisited and this early plan review will have to be secured.

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?

If Tudeley Village is deleted from the Plan, no consideration has been given by the Council yet as to what highways infrastructure would be needed in Tudeley and along the B2017 from the remaining growth proposed around Paddock Wood. This renders the plan and the deletion of Tudeley Village inherently unsound and there is no solution to this other than restoration of Tudeley Village. Without prejudice to that, it would underline the critical importance of the early plan review being secured.

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

It is noted that the cost of the Colt Hill Bypass suggested by the Council has now been arbitrarily reduced from £20,000,000 to £7,250,000. There is no proper evidence to explain how this reduction in cost has been realised. The Stantec Access and Movement Report notes the following:

*“The revised bypass partly follows the route of the bypass scheme proposed by Kent County Council but will have a comparatively smaller corridor width. The section of the A228 to the south of the Alders Road / Crittenden Road junction is considered suitable to accommodate the proposed local plan development traffic without any further upgrade being required.”
(Document PS_060, paragraph 5.3.3)*

The absence of explanation for this reduction is unsound. It appears to be fundamentally the same scheme as previously proposed but where costs would be expected to have increased not decreased. The implications of this would be significant for the viability assessment and the deliverability of the infrastructure strategy overall.

Without the allocation of Tudeley Village, the work required on how the Plan can deliver the necessary upgrades to the wider highway network, such as the Colts Hill Bypass, has not been robustly undertaken and this work will therefore be a necessary part of the Early Plan Review.

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?

Given the location of the proposed Colts Hill Bypass, the issues identified above in respect of landscape character, the Green Belt and the AONB do apply.

If it were demonstrated through this process that alternative mitigation measures are not sufficient to mitigate the impact of the local plan growth, such that there was a demonstrable need for the Colts Hill bypass, this would provide sufficient justification to demonstrate the bypass was appropriate development in the Green Belt and this would outweigh the harm to the setting of the AONB as a matter of principle.

Accordingly, the detail of that mitigation is a matter than can reasonably be addressed through the development management process.

Issue 4 – Meeting Future Housing Needs

Q1. The Council's suggested changes to the Plan include a commitment to an early review. Should the suggested early review of the Plan also include reference to Tudeley Village, either as a future development option or broad locations for growth?

The answer to this question is yes – there must be reference to Tudeley Village as part of the early plan review (if it is not allocated) and it must be identified properly as a future development option and location for growth given all the work and evidence produced to date.

The Council's suggested changes to the Plan include a commitment to an early review. That needs to be secured. The Estate has identified how a policy ought to secure this by creating a presumption in favour of Tudeley Village unless the early review of the Plan identifies otherwise (see Matter 1). The early review of the Plan should include specific reference to Tudeley Village as a future development option **and** as a broad location for growth. This would reflect all of the work that has been done to demonstrate the need for it and the absence of alternative options.

Tudeley Village provides a sustainable location for the delivery of a high quality, sustainable new community. The evidence base demonstrates that there are no planning barriers to the delivery of Tudeley Village. The evidence base also demonstrates that there are no alternative sites to meet the shortfall in housing arising from the removal of Tudeley Village. It is therefore logical and essential that the early review of the Plan should include specific reference to Tudeley Village as a future development option and as a broad location for growth.

Furthermore, including specific reference to Tudeley Village as a future development option and as a broad location for growth will ensure that a holistic approach to the question of secondary education and transport infrastructure in the proper interests of planning for growth in this part of the Borough is taken as part of that early Local Plan review.

Issue 5 – Exceptional Circumstances

Q1. Do the exceptional circumstances exist to alter the Green Belt boundary in this location, having regard to paragraphs 140 – 143 of the Framework?

The Council's exceptional circumstances justification set out in the Development Strategy, October 2021 (Core Document 3.126) at paragraphs 6.174 to 6.188 remains entirely extant and are now reinforced by all the further work that has been done.

The Council have provided yet further evidence to demonstrate exceptional circumstances in support of the removal of Tudeley Village from the Green Belt.

- In respect of NPPF paragraph 141, it is demonstrated by the Council's evidence, most notably the Sustainability Appraisal Addendum (PS_037) and Stage 3 Green Belt Assessment Addendum (PS_035), that there are no other reasonable alternative strategic site options for meeting the identified housing needs.

- In respect of NPPF paragraph 142 and 143, the allocation of Tudeley Village will facilitate a sustainable pattern of the development, consistent with the Council's development strategy. Specifically, the provision of necessary strategic infrastructure - most notably a new secondary school and sustainable active travel opportunities - can only be realised if the allocation of Tudeley Village is brought forward alongside the proposals for growth at Paddock Wood.

- In respect of NPPF paragraph 140 and 143, it is evident that the allocation of Tudeley Village will assist in ensuring Green Belt boundaries can endure beyond the plan period, realising a strategic location for growth which will provide for housing needs into the next plan period.

Q2. Are the Council's suggested Main Modifications necessary to make the submitted Plan sound?

The answer to this question is emphatically no. Rather than making the submitted Plan sound, the Council's suggested Main Modifications make the Plan unsound.

Without prejudice to the other problems identified, as a matter of principle, the Main Modifications would only provide a plan to meet the objectively assessed needs of Tunbridge Wells Borough for a 10-year period only, and with what will be an ineffective infrastructure strategy. This falls short of the requirements of NPPF paragraph 22. The Main Modifications are thereby not effective, not positively prepared and not sound.

As a consequence of the suggested Main Modification removing Tudeley Village, the Plan is now reliant upon strategic allocations at Paddock Wood. The evidence demonstrates that the infrastructure strategy for Paddock Wood is ineffective in at least two critical ways: secondary school provision and sustainable active travel provision.

The inclusion of Tudeley Village can resolve both of these infrastructure issues and ensure a deliverable and effective infrastructure strategy for the Plan period. The allocation of Tudeley Village should therefore comprise an important and necessary part of the development strategy for the Tunbridge Wells Borough.

The evidence base demonstrates that there are no planning barriers to the delivery of Tudeley Village. It also demonstrates that there are no alternative sites to meet the shortfall in housing arising from the removal of Tudeley Village. It is therefore illogical to remove Tudeley Village and represents a failure in the delivery of an effective and sound Local Plan to address the Borough's needs.