

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 12: Transport
Infrastructure (Policies STR6,
TP1, TP2, TP3, TP4, TP5 and
TP6)**
**Issue 4: Safeguarded
Infrastructure**

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Matter 12 – Transport Infrastructure (Policies STR6, TP1, TP2, TP3, TP4, TP5 and TP6)

Issue 4 – Safeguarded Infrastructure

Inspector’s Question 1: [re. reasons for safeguarding the ‘off-line’ A228 scheme]

The supporting text at paragraph 6.579 of the Plan states that an entirely ‘off-line’ route for the A228 at Colts Hill is not necessary to mitigate the impacts of proposed growth at Tudeley Village and around Paddock Wood. What are the reasons, therefore, for safeguarding the route of the ‘off-line’ scheme in the Plan?

TWBC response to Question 1

Introduction

1. Policy TP6 (Safeguarding Roads) of the Submission Local Plan [[CD 3.128](#)] proposes a part off-line new section of highway running to the north of a collection of houses along the A228, together with other on-line improvements to the A228 to the south-west, and a new highway link bypassing Five Oak Green, as set out in Policies STR/SS1 and STR/SS3. The reasoning, therefore, for safeguarding the route of the entirely off-line scheme is outlined within the response below.

Consideration

2. Despite the full off-line A228 route not being required to facilitate the growth through this Local Plan, paragraph 6.580 states that, “*nevertheless, the Kent County Council [Transport Plan 4: Delivery Growth without Gridlock 2016-2031](#) identifies the A228 Colts Hill relief scheme as a cross-district priority; it forms part of the major road network, and the provision of an entirely off-line route is expected to deliver wider economic and transport benefits than the part-offline and part on-line route*”. Paragraph 6.581 subsequently states that “*it is therefore considered appropriate to continue to safeguard*

the route of the entirely off-line scheme throughout this plan period". This will enable the full off-line route to come forward if required during the plan period should Kent County Council (KCC) obtain funding for this to meet its other aspirations unrelated to the growth proposed within Tunbridge Wells borough, and/or if required through further Local Plan periods beyond 2038 moving forward. Furthermore, as clarified within paragraph 6.582, the part-off-line route proposed to mitigate the impact of Paddock Wood and Tudeley would not prejudice the potential delivery of the entirely off-line route, as they could be linked should the full off-line route come forward in the future. The Council have also had discussions with KCC Highways on a number of occasions to investigate and develop potential bids for the section of the safeguarded A228 Colts Hill bypass from Pembury to the Alders' Road junction (see Statement of Common Ground between Tunbridge Wells Borough Council and KCC [\[PS 025\]](#)).

3. As noted within paragraph 6.578 of Policy TP6, the entirely off-line route has been a longstanding plan/long-term option for the county as a whole which has been subject to considerable historic assessment and consideration, and has been safeguarded in previous Development Plans, including the Local Plan (2006), Core Strategy (2010), and Site Allocations Local Plan (2016). The proposed scheme was initially put forward in 1991 and subsequently approved by KCC as Highway Authority following a public consultation (see [Chapter 11 of 2006 Local Plan](#)). It is part of the KCC's current [Local Transport Plan 4](#) (please see pages 25 and 31), listed as priority "*which will improve travel in Kent*".

Conclusion

4. Consequently, given the above, the Council considers that it remains appropriate and prudent for the full offline A228 route to be safeguarded as a long-term option in the event of further needs arising in a future plan period. It remains a long-term cross-district transport priority in KCC's Transport Plan and as such should be safeguarded accordingly.

Inspector's Question 2: [re. is the safeguarded full 'off-line' A228 scheme justified and deliverable]

Does the safeguarded route remain justified and is it deliverable?

TWBC response to Question 2

Consideration

5. Regarding whether the safeguarded full offline A228 scheme is justified within the Plan, it is considered that this is already addressed within the Council's response to Question 1. That is, despite not being necessary for the delivery of the proposed strategic sites in the Plan, the route remains a long-term cross-district transport priority in KCCs Transport Plan and as such should be safeguarded accordingly. In addition, the Council considers it is also important to safeguard the entire offline route for the longer-term in the event that the proposed Lower Thames Crossing and further future development, including development consequent to that, could generate a need: the A228 is part of the major road network from west Kent to north Kent and the Thames estuary. National Highways' Lower Thames Crossing proposal is currently subject to a Local Refinement Consultation (closing on 20 June 2022), with plans to submit an application for a Development Consent Order to the Planning Inspectorate later in 2022. Subject to consent being granted, National Highway intend to start construction in 2024.
6. Safeguarding the entire offline route would therefore be in accordance with paragraph 106 of the National Planning Policy Framework which states that planning policies should "*identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development*".
7. In terms of deliverability, the Council notes that funding sources for the full offline route is not included within this Local Plan and, at the time of writing this Hearing Statement, have not been identified. Deliverability over the plan period is therefore uncertain. However, as per paragraph 2.3 of the Statement of Common Ground between Tunbridge Wells Borough Council and KCC [[PS 025](#)], the Council has met to discuss with KCC on a number of occasions to investigate and develop potential bids for infrastructure funding (including but not limited to the section of the safeguarded A228 Colts Hill bypass from Pembury to the Alders' Road junction – i.e., the section of

safeguarded road beyond that to be delivered to mitigate the impact from the strategic sites, which will be funded from the development of the strategic sites). As such, despite not being considered necessary to mitigate the impact of proposed development within the plan period, the Council has, and will continue to have, discussions with KCC to explore potential funding bids to deliver the scheme.

8. It is also acknowledged that it will be necessary to acquire additional land to provide the full off-line bypass (as well as the part off-line bypass and the Five Oak Green by-pass). As such, as per paragraph 3.18 of the Council's Statement of Common Ground with KCC [[PS 025](#)], both the Borough and County Council agree to the principle of working cooperatively on Compulsory Purchase Orders, if considered necessary.
9. Therefore, even if the scheme is not deliverable over this plan period, for reasons set out above, it is considered prudent to safeguard land to facilitate the full bypass route to come forward over future plan periods if required, particularly given Phase 1 will be delivered through the growth around the Strategic Sites potentially unlocking funding in due course.

Inspector's Question 3: [re. justification for safeguarding A21]

What is the justification for safeguarding the remaining section of the A21 from the Kippings Cross roundabout to the Lamberhurst roundabout? How and when is this expected to be delivered?

TWBC response to Question 3

Introduction

10. The supporting text (paragraph 6.584) of Policy TP6 notes that the dualling of the A21 from Tonbridge to Kippings Cross has been completed (between 2015 and 2017), with the remaining section from the Kippings Cross roundabout to the dualled section at the Lamberhurst roundabout proposed to be safeguarded along National Highways' preferred route. The reasoning, therefore, for safeguarding the route of the A21 scheme is outlined within the response below.

Consideration

11. Further to the above, the supporting text of Policy TP6 makes it clear that "*the delivery of this infrastructure is not required to deliver growth proposed in the Local Plan, although it remains a long-term cross-district transport priority in the Kent County Council Transport Plan 2016-2031 and is accordingly safeguarded on that basis*". The Council's approach therefore to the safeguarded A21 route is similar to that of the safeguarded full offline A228 scheme, i.e., while it is not required to mitigate the impacts of proposed growth within the plan period, it remains prudent to safeguard the route.
12. In addition, similarly to the safeguarded A228 scheme, the proposed safeguarding of the A21 scheme is a long-standing scheme which has been safeguarded in previous Development Plans, including the Local Plan (2006), Core Strategy (2010), and Site Allocations Local Plan (2016). The proposed route was initially identified by the Highways Agency in May 2004 (see [Chapter 11 of 2006 Local Plan](#)). It is also part of the KCC's current [Local Transport Plan 4](#) (please see pages 25 and 31), listed as priority "*which will improve travel in Kent*".
13. It is acknowledged that National Highways initially considered (within their representation during the Regulation 19 consultation on the Pre-Submission Local Plan) that it no longer required the land to be safeguarded in the Local Plan, given there are

no current proposals for this part of the A21. However, within the Statement of Common Ground between Tunbridge Wells Borough Council and National Highways (29 October 2021; [[CD 3.132cv](#)]), National Highways stated the following:

“In the representation NH has requested that Policy TP6 is amended to delete the reference to safeguarded land for future dualling of the A21 from Kippings Cross to Lamberhurst Roundabout. NH has since clarified that it has no objection to the safeguarding but is clear that NH has not requested or required the safeguarding of this land. Whilst not required to mitigate growth proposed in the Local Plan, the Council is safeguarding the A21 Kippings Cross to Lamberhurst route as it remains a long-term, cross-district transport priority in the TWBC Transport Strategy and the KCC Local Transport Plan 4”.

14. It is added that the A21 Reference Group, which consists of Members of Parliament whose constituencies lie along the A21, local authority representatives, and Transport for the South East, are continuing their efforts in pushing the government to upgrade the A21 between Kippings Cross and Lamberhurst and consider the dualling a key strategic transport priority in the south-east (see [here](#)). Both Tunbridge Wells Borough Council and the MP for Tunbridge Wells (Greg Clark) are members of this A21 Reference Group. In addition, the A21 is described by Transport for the South East as *“the least developed Strategic Road Network road”* in the South East area, which *“undermines the potential for this corridor to support regeneration and economic development”*. Continuing to safeguard this route would therefore support this group’s objectives and ensure that proposals brought forward which may compromise the implementation of a potential dualled scheme from Kippings Cross to Lamberhurst are not permitted. It is anticipated that further information will be provided in an updated Statement of Common Ground with National Highways in week commencing 13th June 2022.

Conclusion

15. Consequently, while it is considered unlikely that the A21 scheme would come forward within the plan period, with the funding mechanism for its delivery yet to be determined, and that the safeguarded route is not required to mitigate growth proposed in the Local Plan, the Council considers that it remains prudent to continue safeguarding the route given that it is a longstanding long-term cross-district transport priority in the Kent

County Council Transport Plan 2016-2031. It is added that East Sussex County Council in the Statement of Common Ground with Tunbridge Wells Borough Council [[CD 3.132cii](#)] are also supportive of the safeguarded route for the dualling of the A21 between Kippings Cross and Lamberhurst Roundabouts.