

Tunbridge Wells Borough Local Plan Examination Matters, Issues and Questions (MIQs)

Matter 4: Paddock Wood National Highways' Statement

Issue 4: Highways Infrastructure

Q.6: 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?

1. National Highways (NH) has worked constructively with Tunbridge Wells Borough Council (TWBC) and their appointed transport consultants (SWECO and Stantec) to agree the scope and content of the technical assessments which have been undertaken to support the Local Plan process. This work is documented in several reports within the examination library and additionally in further recent reports (an updated Strategic Transport Assessment (STA) prepared by SWECO, and the Mitigation Modelling Technical Note (MMTN) prepared by Stantec) which have been prepared and shared with NH (and Kent County Council Highways) but are not part of the examination library at the time of preparing this statement. Further details of how NH has appraised these reports are set out in NH's response to corresponding questions under Matter 7.
2. The assessments have sought to identify and address the cumulative impacts of

the Local Plan, rather than being focused on the impact associated with individual sites. However, the location and scale of the Paddock Wood proposed allocation means that it is expected to contribute a significant portion of the anticipated Local Plan traffic at the A21 Kippings Cross junction and A21 / A228 Pembury Road “dumbbell” junctions. The majority of the remaining impacts are understood to be associated with the proposed allocations in and around Royal Tunbridge Wells.

3. NH’s assessment of the technical evidence in the STAA and MMTN has determined that both of these junctions are identified as “hotspots” in the 2038 reference case models. This indicates that without the proposed Local Plan development these junctions are expected to be near to or at capacity by the end of the Local Plan period.
4. The Strategic Transport Assessment includes an appraisal of the expected growth in traffic associated with the year-by-year trajectory for build-out of the Local Plan schemes. It is understood that this is consistent with the corresponding information which is included as part of the main Local Plan document. Whilst this does not distinguish between Paddock Wood and the other sites, it nevertheless indicates the points at which individual junction mitigation schemes are expected to be required. This is based on a defined capacity threshold for each junction being reached on one or more arms. The results of the appraisal are set out at Table 25 of the updated Strategic Transport Assessment.
5. The table indicates that part of the A21 Kippings Cross junction is expected to reach capacity imminently (i.e. in the modelled year of 2024). This reflects current observed congestion issues at the junction. As is described in the updated Strategic Transport Assessment, the mitigation for A21 Kippings Cross is

achieved through the implementation of the proposals for the five junctions on the A21 Pembury Road corridor. The further appraisal within the updated Strategic Transport Assessment indicates that the Maidstone Road approach to Kippings Cross is expected to exceed capacity in 2029, with the A21 southbound slip at the A21 / A228 dumbbell junctions expected to exceed capacity in 2030.

6. It is therefore NH's expectation, based on the supplied technical assessments and the corresponding development trajectory information, that implementation of the proposed improvements on the A21 Pembury Corridor (to include those which are proposed at KCC-managed junctions on the local road network) will need to be in place by no later than 2029 if build-out of the Local Plan and reference case developments proceeds as currently predicted. Should this trajectory change, a faster delivery of development (either at Paddock Wood or elsewhere) may trigger an earlier need for the A21 Pembury corridor improvements. The updated Strategic Transport Assessment notes that the delivery of the Colts Hill bypass could also accelerate growth on this corridor. The proposed Monitor and Manage arrangements are intended to provide a mechanism for the performance of SRN junctions to be understood throughout delivery of the Local Plan, in parallel with the planning application process which will require re-appraisal of the timing of specific mitigations in accordance with the updated phasing of each development as it is brought forward. It is also understood that a more detailed version of the development trajectory is being developed which includes projections for yearly build-out on a site-by-site basis and for windfall along with the phasing of essential infrastructure. This will need to feed back into the IDP preparation (see Issue 5, question 1 response below).

7. Based on the information shared with NH at the time of preparing this statement, NH considers that it is 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. NH is satisfied that the requirements

specifically applicable to Paddock Wood are understood in the context of the current trajectory assumed for the purposes of the Local Plan, with a monitor and manage mechanism proposed to enable these to be confirmed or adjusted as necessary as the site moves further through the planning process.

8. NH is content that the modifications in respect of Paddock Wood have been appropriately represented in the updated technical assessments (Updated STA and MMTN). It is NH's view that these assessments are sufficient to demonstrate that the proposed mitigation measures are justified and effective. There would not be any unacceptable impacts on highway safety, nor would the residual cumulative impacts on the Strategic Road Network (SRN) be severe as a result of the Local Plan.

Issue 5: Viability and Infrastructure Provision

Q.1: Has the Infrastructure Delivery Plan ('IDP') been updated to reflect the suggested changes to the Plan?

9. NH has been consulted on a number of proposed updates to the IDP which address points relating to the role of NH, the application of Circular 01/2022, and the representation of the proposed mitigation schemes on the SRN including those parts of the IDP which relate to Paddock Wood. The draft updates that have been shared include a detailed year-by-year development trajectory (individual and cumulative totals) highlighting when essential infrastructure needs to be implemented alongside the Local Plan development strategy. It is understood that an updated version of the IDP incorporating these changes is to be submitted to the Examination in parallel with TWBC's hearing statement on the relevant matters. At the time of preparing this statement, NH is happy with the progress being made on the update to the IDP.

10. It is important to note that NH is not identified as a delivery partner in relation to any proposed works to the SRN. This role will be fulfilled either by one or more developers, or by TWBC. This reflects the expectations of the Department for Transport (DfT) Circular 01/2022 (para.29). The priorities for the SRN are set in the Road Investment Strategy (RIS). There cannot be any presumption that the infrastructure necessary to mitigate the impacts of the Local Plan development on the SRN will be funded through a future RIS. For clarity, NH will participate fully in relation to the further development and detailed approval of mitigation schemes (including safety checks) prior to their implementation. However, all responsibility for the funding, contracting and delivery of necessary works will remain with the developer(s) or TWBC with governance managed through a s.278 agreement with NH where it relates to the SRN.

11. With reference to the appraisal of scheme implementation timings presented in the updated Strategic Transport Assessment, the timeframes for delivery of the specific identified mitigation measures on the SRN (including those on KCC's network which contribute to the wider mitigation effects on traffic distribution) have not (at the time of preparing this statement) been updated in the IDP text. This will need to be undertaken and it is understood that this will take place prior to the preparation of and consultation on the main modifications.