



Growth, Environment & Transport

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BY EMAIL ONLY

28 June 2024

Dear Charlotte,

Re: Written Statement to the Tunbridge Wells Local Plan Examination – Stage 3 Matters, Issues and Questions

Thank you for inviting Kent County Council (the County Council) to submit a Written Statement to the Examination of the Tunbridge Wells Local Plan. The County Council, as Local Highway Authority and Local Education Authority, provides the following response in respect of the Matters, Issues and Questions (MIQs).

Matter 4 – The Strategy for Paddock Wood

Issue 2 – Education provision

Q2. How will the needs for secondary school education be met? Will this be through the expansion of Mascalls Academy and/or provision of a new school? What evidence has been produced which considers the merits of each option?

Local Education Authority:

The County Council notes the Local Plan Development Strategy Topic Paper – Addendum (Examination Library reference PS_054) sets out the Borough Council's proposed approach to Education provision within the Plan. This has been developed in consultation with the County Council, as Local Education Authority.

The Local Plan Development Strategy Topic Paper – Addendum (Examination Library reference PS_054) outlines that under the proposed reduced housing level with the removal of Tudeley Village (Policy STR/SS3) the previously proposed site for the establishment of a

secondary school is no longer within the plan and at the same time, there will be a reduction in the number of secondary school places required in response to the reduced housing level.

The Borough Council has set out a strategy whereby an alternative site for the establishment of a new secondary school is made within Paddock Wood and this site will be safeguarded until it is determined whether an additional 3 Form Entry (FE) of provision can be made through expansions of schools within the relevant area. It is important that an eventual net increase of 450 places can be provided in response to growth within Paddock Wood. Where it is demonstrated that an additional 3FE at Mascalls can be achieved and is deliverable (which would represent a net gain in provision within the area) then this is likely to form the proposed route to providing the necessary additional places.

The County Council has identified the operational and educational challenges of expanding a school to such a size, however, the Academy Trust responsible for the running of the school would be required to mitigate these appropriately. The County Council, as Local Education Authority, supports the strategy set out in paragraph 4.52 of the Local Plan Development Strategy Topic Paper – Addendum (Examination Library reference PS_054) that the allocated parcel for a new secondary school be safeguarded until such time that a net additional increase of 3FE at Mascalls, or at Mascalls in conjunction with another school, is confirmed as feasible. The County Council, as Local Education Authority, would request that necessary education provision is secured through appropriate policy wording within the Local Plan – whether this be located at Mascalls or an alternative location.

Issue 4 – Highways Infrastructure

Q1. 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?

Local Highway Authority:

A strategic transport model has been developed by Sweco. This assesses the impact of the Revised Local Plan Development Strategy on the highway network without the Five Oak Green bypass. Highway mitigation is proposed at those locations identified as a 'major hotspot' where there are capacity issues as a result of the Local Plan growth. The mitigation must be included in the Infrastructure Delivery Plan.

Results of the modelling of the Revised Local Plan Development Strategy without the Five Oak Green bypass are reported in the Local Junction Capacity Sensitivity Testing Technical Note (Appendix A) (Examination Library reference PS_059) and the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).

With regard to the impacts on the B2017 and Five Oak Green, the reports conclude:

Although the 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. However, it is recommended that

consideration be given to the implementation of enhanced traffic management through the area to better support the flow of vehicles whilst also integrating this with enhanced infrastructure for people walking, wheeling, and cycling in the area to enable them to safely travel along and across the link. More broadly the sustainable transport measures should be designed to maximise accessibility to Paddock Wood rail services to reduce the need for car travel on this link. The design and implementation of such measures would be expected to be linked to Travel Plans and Monitor and Manage agreements for all major Local Plan developments in the wider Paddock Wood area.

It is noted that the B2017 is not identified as a collision hotspot in the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123) and the removal of the Tudeley Village allocation from the development strategy reduces the stress on the B2017. However, the County Council, as Local Highway Authority, remains concerned that link capacity along the B2017 is predicted to be at full capacity in the Local Plan Modal shift (LPMS) scenario during the AM peak. It is recommended that the route should be included in the Monitor and Manage Strategy to review capacity and safety with traffic management measures brought forward, if necessary, as outlined in the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).

Q2. Is the Colts Hill Bypass required as a result of the growth proposed around Paddock Wood? How will it be funded and delivered?

Local Highway Authority:

A link capacity analysis of the A228 Maidstone Road, Colts Hill was reported in the Local Junction Capacity Sensitivity Testing Technical Note (Appendix A) (Examination Library reference PS_059) and the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).

The Technical Note states:

A228

The data analysis shows that there is a significant capacity issue on the A228 link through Colts Hill, south of the Badsell Roundabout junction with the B2017. As a result, the model was updated with a higher capacity link that replicates building a new road to modern standards with wider lanes and pavements provided. The analysis in the table for 'New Road' shows that this new link will alleviate the V/C issues along this link. Stantec have designed up the Colts Hill Bypass link for the area that links into a potentially expanded Badsell Roundabout. The trigger point is estimated to be approximately 2,000 dwellings.

The data shows that the link to the north of the Badsell Roundabout is projected to remain within capacity over the Local Plan period.

The capacity analysis indicates that the Colts Hill bypass is required as a result of the proposed growth around Paddock Wood and the costs would be equalised across the Strategic Site developments and included as part of the S106 process for each application. Delivery of the scheme will be managed by the Borough Council and the County Council.

Q4. What is the justification for suggesting the removal of the Five Oak Green Bypass from the Plan, but not the Colts Hill Bypass?

Local Highway Authority:

Sweco has developed a transport model which identifies the impacts of the local plan growth on the surrounding road network. The impact of the Revised Development Strategy without the Five Oak Green bypass is reported in the following documents:

- Local Junction Capacity Sensitivity Testing Technical Note (Appendix A) (Examination Library reference PS_059)
- Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).

With regard to the impacts on the B2017 and Five Oak Green, the reports conclude:

Although the 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. However, it is recommended that consideration be given to the implementation of enhanced traffic management through the area to better support the flow of vehicles whilst also integrating this with enhanced infrastructure for people walking, wheeling, and cycling in the area to enable them to safely travel along and across the link. More broadly the sustainable transport measures should be designed to maximise accessibility to Paddock Wood rail services to reduce the need for car travel on this link. The design and implementation of such measures would be expected to be linked to Travel Plans and Monitor and Manage agreements for all major Local Plan developments in the wider Paddock Wood area.

It is noted that the B2017 is not identified as a collision hotspot in the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123) and the removal of the Tudeley Village allocation from the development strategy reduces the stress on the B2017, however the County Council, as Local Highways Authority remain concerned that link capacity along the B2017 is predicted to be at full capacity in the Local Plan Modal shift (LPMS) scenario during the AM peak. It is recommended that the route should be included in the Monitor and Manage Strategy to review capacity and safety with traffic management measures brought forward if necessary, as outlined in the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).

In respect of the requirement for the Colts Hill Bypass, the reports conclude:

A228 The data analysis shows that there is a significant capacity issue on the A228 link through Colts Hill, south of the Badsell Roundabout junction with the B2017. As part of the Local Plan Highways Mitigation scenario the model was updated with a higher capacity link that replicates building a new road to modern standards with wider lanes and pavements provided. The analysis in the table for 'New Road' shows that this new link will alleviate the V/C issues along this link. Stantec have designed

up the Colts Hill Bypass link for the area that links into an expanded Badsell Roundabout. The trigger point is estimated to be approximately 2,000 dwellings. The data shows that the link to the north of the Badsell Roundabout is projected to remain within capacity over the Local Plan period.

The capacity analysis provides evidence that the Colts Hill Bypass is required to mitigate the impacts of the Local Plan growth.

Q5. 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?

Local Highway Authority:

The Borough Council has adopted a Vision and Validate approach to highway mitigation and this accords with Department for Transport Circular 01/2022.

The vision is to achieve a high modal shift by delivering a suite of sustainable transport initiatives to provide attractive alternatives to private car journeys.

A sensitivity test has been completed for the revised Local Plan Strategy, using the strategic model and assuming low modal shift. Mitigation is proposed for all junctions identified as 'major hotspots' in the low modal shift scenario to be brought forward if necessary, through the Monitor and Manage Strategy.

Further detail on the modal shift assessment can be found in Tunbridge Wells Local Plan Stage 3 Modal Shift Impact Reporting (Examination Library reference PS_049).

Q6. 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?

Local Highway Authority:

The strategic highway improvements and the year they are required is included in the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).

It is understood that the Borough Council is updating the Infrastructure Delivery Plan which will list the highway improvement schemes and the sustainable transport initiatives together with expected delivery dates, costings, and viability assessment.

Matter 7 – Highways Infrastructure

Issue 1 – Strategic and Local Road Network

Q1. Without the proposed bypass, what effect will the suggested changes to the Plan have on the B0217 through Five Oak Green? What mitigation measures will be necessary in this location and how will they be achieved?

Local Highway Authority:

A strategic transport model has been developed by Sweco. This assesses the impact of the Revised Local Plan Development Strategy on the highway network without the Five Oak Green bypass. Highway mitigation is proposed at those locations identified as a 'major hotspot' where there are capacity issues as a result of the Local Plan growth. The mitigation is to be included in the Infrastructure Delivery Plan.

Results of the modelling of the Revised Local Plan Development Strategy without the Five Oak Green bypass are reported in the following documents which are attached.

- Local Junction Capacity Sensitivity Testing Technical Note (Appendix A) (Examination Library reference PS_059)
- Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).

With regard to the impacts on the B2017 and Five Oak Green the reports conclude:

Although the 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. However, it is recommended that consideration be given to the implementation of enhanced traffic management through the area to better support the flow of vehicles whilst also integrating this with enhanced infrastructure for people walking, wheeling, and cycling in the area to enable them to safely travel along and across the link. More broadly the sustainable transport measures should be designed to maximise accessibility to Paddock Wood rail services to reduce the need for car travel on this link. The design and implementation of such measures would be expected to be linked to Travel Plans and Monitor and Manage agreements for all major Local Plan developments in the wider Paddock Wood area.

It is noted that the B2017 is not identified as a collision hotspot in the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).

and the removal of the Tudeley Village allocation from the development strategy reduces the stress on the B2017, however the Local Highway Authority remains concerned that link capacity along the B2017 is predicted to be at full capacity in the Local Plan Modal shift (LPMS) scenario during the AM peak. It is recommended that the route should be included in the Monitor and Manage Strategy to review capacity and safety with traffic management measures brought forward if necessary, as outlined in the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).

Q2. What effect will the suggested changes to the Plan have at Kippings Cross (A21/B2160)? Do the conclusions and recommendations in the Kippings Cross Junction – Local Plan Mitigation Option Analysis remain relevant?

Local Highway Authority:

The junction of the A21/B2160 Kippings Cross, has been identified as ‘major hotspot’, requiring mitigation, in the strategic modelling work completed by Sweco for the Revised Local Plan Development Strategy. The Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123) describes the mitigations considered to date and explanations are provided as to why previously considered options have been discounted. This includes the options previously identified in the Kippings Cross Junction – Local Plan Mitigation Option Analysis (Examination Library reference PS_033).

The Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123) identifies two options which have potential to be taken forward as part of the Local Plan mitigation strategy and these comprise of:

- Option 1 Improvements to capacity at Kippings Cross; and
- Option 2 Improvements to capacity along the A228/A264 Pembury Road corridor including Colts Hill bypass, to provide an attractive alternative route to reach the A21.

It is understood that further work is being completed by Sweco and by Stantec to model the impacts of Option 2 to inform the mitigation option to take forward and include in the Local Plan Monitor and Manage Strategy.

Q3. What effect will the proposed changes to the Plan and distribution of growth have on the remaining “hotspots” identified in the evidence base? Will there be any unacceptable impacts on highway safety or will the residual cumulative impacts on the road network be severe as a result of the Plan?

Local Highway Authority:

The Revised Local Plan is found to be acceptable in terms of highway safety and the residual cumulative impacts on the road network are not considered to be severe subject to the following:

- Delivery of the sustainable transport interventions and highway infrastructure mitigation as identified in the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123).
- The inclusion of all ‘major hotspots’ as identified in the Strategic Transport Assessment – Modelling Appraisal (Examination Library reference TWLP_123) in the Monitor and Manage Strategy; and
- Additional supportive evidence being prepared by Tunbridge Wells Borough Council (TWBC) via its consultants Sweco and Stantec to provide further evidence of mitigation options, Infrastructure Delivery Plan, costings, and viability assessment.

Q4. Where mitigation is required, can any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?

Local Highway Authority:

The mitigation solutions are considered acceptable and appropriate in principle, subject to the work which is currently being finalised by TWBC and which includes the Infrastructure Delivery Plan, costings and viability assessment which are yet to be received.

If you require any further information or clarification on any matter raised in this letter, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simon Jones', enclosed in a thin black rectangular border.

Simon Jones

Corporate Director of Growth, Environment and Transport