

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR/SS 3 The Strategy for Tudeley Village

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
6-1	Linda Bingham				3 Review of the proposal for a new garden village at Tudeley		Pleased to see the removal of houses planned at Tudeley.	This is noted.
8-1	David Scott				3.4 Issue area A: Location and Accessibility	Consideration of the creation of new transport links using existing light weight electric minibus style, narrow vehicles. Suitable inexpensive pathways can be build across country following the routes of cycle and walking pathways. The proposals currently only consider traditional modes of transport. They do not consider new modes of transport used elsewhere in the world.	<p>A 'modern light electric pathway' should be developed along the routes of pathways, cycle routes and bridleways to neighbouring towns.</p> <p>Non-traditional modes of transport used elsewhere in the world should be considered.</p>	Further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS 047 , PS 048 , and PS 049) where the road network as a whole has been re-assessed. This includes factoring the modal shift towards more sustainable modes of transport.
8-2	David Scott				3.2 Inspector's Initial Findings		<p>The objections to Tudeley should be addressed rather than deleting the proposal.</p> <ul style="list-style-type: none"> • Further details should be provided on the inability to provide alternative locations with sufficient infrastructure. • A process should be set out for establishing contractual arrangements with developers successfully capable of developing the site. • Detailed agreement with KCC should be obtained on the provision of infrastructure costings. Agreement with the land owners should be obtained to raise these funds through the uplift in land value. • An alternative transport link for light electric vehicles should be developed along the equivalent of cycle paths to Tunbridge Wells and Tonbridge. 	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.</p> <p>The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS 054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.</p>
11-1	James Duffin				3.4 Issue area A: Location	If the Tudeley development has to go ahead, adding a new railway	Issue area A: Location and Accessibility - Paragraph 3.13 with regard to 3.1 The	The Development Strategy Topic Paper Addendum (PS 054) explains the revised

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					and Accessibility	station is the only viable alternative to car use for those that want to journey to Tonbridge, Tunbridge Wells, Paddock Wood or further afield. It would potentially keep the congestion going into Tonbridge at its present level	<p>Local Plan Allocation: Legally Non-compliant/Unsound due to:</p> <p>No anticipation that people would use car though walking/cycling routes might be provided, as seen in the increased congestion near three new housing developments.</p> <p>Proposed for a new railway station should Tudeley development goes ahead.</p>	<p>development strategy following the Inspector's initial findings. The Council's position regard location and accessibility is fully set out within paras 3.12 to 3.37.</p> <p>Whilst the initial masterplan for Tudeley included the aspiration for a new railway station, Network Rail raised some concerns with this including impacts on existing services. Therefore, there are concerns regarding its deliverability.</p>
12-1	James Duffin				3.4 Issue area A: Location and Accessibility	Adding a large settlement at Tudeley will only exacerbate the traffic problems. People will mainly chose to drive, especially on days with bad weather. Either a new road needs to be built from Tudeley straight to the A21, or a new railway station built so that people have a viable alternative to using their car	<p>Issue area A: Location and Accessibility - Paragraph 3.31 with regard to 3.1 The Local Plan Allocation: Legally Non-compliant/Unsound due to:</p> <p>Existing unacceptable congestion within Tonbridge and between itself with Paddock Wood</p> <p>Proposed for a new road connecting Tudeley to A21, or a new railway station should development goes ahead in Tudeley.</p>	<p>The Development Strategy Topic Paper Addendum (PS_054) explains the revised development strategy following the Inspector's initial findings. The Council's position regard location and accessibility is fully set out within paras 3.12 to 3.37.</p> <p>Whilst the initial masterplan for Tudeley included the aspiration for a new railway station, Network Rail raised some concerns with this including impacts on existing services. Therefore, there are concerns regarding its deliverability.</p>
13-1	James Duffin				3.5 Issue Area B: The Five Oak Green Bypass	A bypass to the village is still a viable option. It would improve air quality and safety to the village residents	<p>Issue area B: The Five Oak Green Bypass - Paragraph 3.47: Legally Compliant but Unsound due to:</p> <p>Lack of off-street parking prevalent here as properties fronting onto Five Oak Green Road, e.g. Falmouth Place, potentially hindering traffic</p> <p>Proposal for a bypass to the village is viable, benefiting air quality and safety.</p>	<p>Following the Inspectors initial comments, TWBC have carried out a RAG assessment of the FOG Bypass to understand what would be needed to address the issues raised. This work has raised some uncertainty regarding the potential of resolving the landscape impacts of the bypass as well as the need for further significant work in the form of LVIA etc This contributed to the reasoning for the deletion of the Tudeley Village allocation.</p> <p>The Five Oak Green Bypass is not required in terms of highway impact and improvement need, without the development of Tudeley Village.</p>
16-1	Mike Martin	Liberal Democrats			3 Review of the proposal for a new		Tudeley Village - strongly support its removal as lack of infrastructure and impact	This is noted.

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		(Tunbridge Wells)			garden village at Tudeley		on existing infrastructure, especially Tonbridge a concern.	
22-1	Petrina Lambert				3.4 Issue area A: Location and Accessibility		<p>Transport/Tudeley Cycle routes (para 3.13) - the routes are most likely to be used by school children and commuters. More evidence is needed for safe routes across Tonbridge to schools to make it a viable option. More collaboration with TMBC is needed. Space is limited in the town and there is heavy traffic at school times.</p> <p>Congestion in Tonbridge - para 3.31 states the junction of B2017/A26 is a 'little over capacity', which appears to be different from the Sweco 2021 report, which states at para 9.14 'road is overloaded due to significant increase in demand from L.P in Tudeley'.</p> <p>Five Oak Green Bypass (para 3.38) - without the bypass, there will be a significant impact on traffic in Five Oak Green from development in East Capel. No evidence on how this will be mitigated.</p>	<p>The Development Strategy Topic Paper Addendum (PS_054) explains the revised development strategy following the Inspector's initial findings. The Council's position regard location and accessibility is fully set out within paras 3.12 to 3.37.</p> <p>As part of the revised strategy for the Strategic Sites, the Council has reviewed the sustainable connections in light of the proposed removal of the Tudeley Village allocation. This work is set out within the Provisions for Sustainable Active Travel paper (PS_053). It is also important to highlight that the LDS includes the production of a Local Cycling and Walking Infrastructure, and Low Traffic Neighbourhoods SPD which would formally update the LCWIP measures.</p>
22-3	Petrina Lambert				3.5 Issue Area B: The Five Oak Green Bypass		Five Oak Green Bypass - without the bypass, there will be a significant impact on traffic in Five Oak Green from development in East Capel. No evidence on how this will be mitigated.	The Five Oak Green Bypass is not required in terms of highway impact and improvement need, without the development of Tudeley Village. The further highway modelling carried out, sets out that other highway measures can be introduced within the surrounding highway network to mitigate impacts from development at East Capel and pw.
24-2	Jose Hyatt-Twynam				3.2 Inspector's Initial Findings		<p>Seconded the option to remove the Tudeley Village housing allocation to make the Local Plan both Legally Compliant and Sound on the grounds of:</p> <p>Impacts on the highway network Concerns about the deliverability of Five Oak Green bypass Irreversible burden on the traffic with Tonbridge</p>	<p>This is noted.</p> <p>The Five Oak Green Bypass is not required in terms of highway impact and improvement need, without the development of Tudeley Village. The further highway modelling carried out, sets out that other highway measures can be introduced</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR/SS 3 The Strategy for Tudeley Village

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							<p>Recommended to have windfall sites in Five Oak Green, Tudeley and Capel as set out in the NDP paving way for S106 funds serving community.</p> <p>Supported the prudent early review to meet housing need.</p>	<p>within the surrounding highway network to mitigate impacts from development at East Capel and pw.</p> <p>This is noted. Windfall sites are sites that are not allocated in the Local Plan. Any windfall sites that come forward over the plan-period will be accessed against Development Plan policies, which will include the Capel Neighbourhood Development Plan once it is 'made'.</p> <p>Support for the early review of the Local Plan is noted.</p>
24-3	Jose Hyatt-Twynam				3.5 Issue Area B: The Five Oak Green Bypass		<p>Local Plan is Legally Compliant and Sound when considering the deletion of Tudeley Village and the associated Five Oak Green bypass.</p> <p>The bypass poses unrecoverable detriments to the visual impacts, local landscape, historic character, High Weald AONB, while disrupting the roads during its construction.</p>	<p>This is noted.</p> <p>Following the Inspectors initial comments, TWBC have carried out a RAG assessment of the FOG Bypass to understand what would be needed to address the issues raised. This work has raised some uncertainty regarding the potential of resolving the landscape impacts of the bypass as well as the need for further significant work in the form of LVIA etc This contributed to the reasoning for the deletion of the Tudeley Village allocation.</p>
28-4	CPRE Kent on behalf of CPRE Kent	CPRE Kent	CPRE Kent		3.6 Issue Area C: Deliverability		<p>The amended plan is considered to be legally compliant but not sound in regard to Issue C: Deliverability.</p>	<p>The Development Strategy Topic Paper Addendum (PS 054) explains the revised development strategy following the Inspector's initial findings. The Council's position regard deliverability is fully set out within paras 3.52 to 3.78.</p>
54-3	Christine Spicer				3.5 Issue Area B: The Five Oak Green Bypass		<p>Bypass not needed if Tudeley village is not included.</p>	<p>The Development Strategy Topic Paper Addendum (PS 054) explains the revised development strategy following the Inspector's initial findings. The Council's position regard deliverability the point mentioned specifically, is fully set out within paras 3.47 and 3.48.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR/SS 3 The Strategy for Tudeley Village

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54-6	Christine Spicer				3.2 Inspector's Initial Findings		Seconded Option 3 (delete Tudeley Village), given inadequate transport links, land overuse and impact on Tonbridge's services.	This is noted.
54-10	Christine Spicer				Appendix E: Proposed changes to policy STR/SS 3: The Strategy for Tudeley Village		Agrees with change.	This is noted.
59-1	Christopher Hyatt-twynam				3 Review of the proposal for a new garden village at Tudeley		Plan is legally compliant and sound due to the removal of Tudeley Garden Village from the Local Plan.	This is noted.
59-2	Christopher Hyatt-twynam				3.4 Issue area A: Location and Accessibility		The changes proposed to the Local Plan are supported in regard to the removal of Tudeley Garden Village which acts as a green break between Tonbridge and Paddock Wood. Also the transport report seems dubious in regard to traffic congestion.	This is noted. The Five Oak Green Bypass is not required in terms of highway impact and improvement need, without the development of Tudeley Village. The further highway modelling carried out, sets out that other highway measures can be introduced within the surrounding highway network to mitigate impacts from development at East Capel and pw.
67-3	Andrew Stanley				3 Review of the proposal for a new garden village at Tudeley		Review of proposal for new garden village at Tudeley: Unsound: <ul style="list-style-type: none"> Inspector identified 3 options for Tudeley – vast amount of taxpayers' money spent trying to address these. (PS_054) Paras - 3.12/3.17 what TWBC terms potential merits of a new town in rural Tudeley, most people (TMBC/interested parties) see as negatives. 	The DSTPA (PS 054) sets out how the Council has sought to resolve matters raised by the Inspectors Initial Findings, and as a result make revisions to the SLP to accommodate changes. Highways Modelling has been undertaken to review the impact from growth associated with a revised STR/SS1 and removal of STR/SS 3 from the plan. The modelling work (PS 047 , PS 048 , and PS 049) has been published as part of the stage of the examination, and includes a modal

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							<ul style="list-style-type: none"> • Many references in STR/SS3 and STR/SS1 to increase walking and cycling when in reality there will be thousands of additional cars (Tonbridge already overloaded with cars). Not good for climate change. • (PS_054) Para 3.38 FOG Bypass – concerns about roundabout adjacent to a school, road through Green Belt and attractive countryside dissecting Capel/FOG (north/south), and affecting adjacent AONB. • (PS_054) Para 3.78 (review of alternative Green Belt sites, confidence in SHELAA methodology) – this paragraph and TWBC’s SHELAA site assessment/methodology are flawed. Once TWBC had been offered 2 large sites in Capel, they looked for reasons to find positives for Capel and discount other sites. • Examples of other sites that could have been considered are: <ul style="list-style-type: none"> ○ Horsmonden - Site ref: 144 (approx. 125 acres which could provide 1,000 houses plus – no loss of Green Belt, extension of village, transport links), yet 2800 homes proposed for Tudeley, destroying 420 acres of Green Belt, and affecting ancient woodland and historic sites. ○ Former Blantyre Prison/surrounding land - brownfield site, owned by central government, should be a priority for development, 195 acres of brownfield and non AONB/Green Belt. SHELAA did not assess full area, but a 26 acre area containing buildings. Rejected as possible garden village because it was too small - full site should have been considered. 	<p>shift strategy including a Bus Feasibility Study (PS_058).</p> <p>The Five Oak Green Bypass will not be necessary now that the Council’s proposed changes have resulted in the removal of TGV (STR/SS 3) from the plan.</p> <p>A Green Belt Study 3 Addendum report (PS_035) of reasonable alternatives has indicated no other sites are available and SHELAA work (CD_3.77 and PS_036) has indicated that all available sites have been utilised in the plan. Brownfield land has been fully explored through the Brownfield and Urban land Topic Paper Ref: CD 3.83</p> <p>All sites considered through the SHELAA process have been robustly assessed. Site selection has been dealt with at a previous hearing session - Matter 5, Issue 1 Site Selection Methodology held on 27 May 2022 and dealt with in the Council’s Hearing Statement TWLP/021.</p> <p>Site 144: Land adjacent to Yew Tree Green Road, Maidstone Road and Furnace Lane, Horsmonden as been assessed through the SHELAA process and was found unsuitable as a potential allocation.</p> <p>Blantyre Prison has been assessed through the SHELAA process, as site reference DPC 3 and was found unsuitable for allocation at this time.</p> <p>The Council has not used selective material to justify the proposed development strategy, which has been evidence-led throughout the plan-making process.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR/SS 3 The Strategy for Tudeley Village

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							<ul style="list-style-type: none"> TWBC has used selective material to justify not finding alternatives to Capel and Tudeley. 	
68-1	Louise Goldsmith	Capel Parish Council			Appendix E: Proposed changes to policy STR/SS 3: The Strategy for Tudeley Village		<p>STR/SS3- removal of Tudeley Village:</p> <p>Proposal would have inflicted an unfair burden on neighbouring Tonbridge & Malling, particularly roads/traffic in Tonbridge town centre.</p> <p>Proposed Five Oak Green bypass did not demonstrate exceptional circumstances for removal from MGB, impact on AONB not assessed and costs/timing uncertain</p> <p>Landowner unsure all houses could be built, so exceptional circumstances for Green Belt removal untenable</p> <p>Unconvinced on transportation studies and modal shift towards public transport/cycling</p>	<p>The DSTPA (PS_054) sets out how the Council has sought to resolve matters raised by the Inspectors Initial Findings, and as a result make revisions to the SLP to accommodate changes.</p> <p>Highways Modelling has been undertaken to review the impact from growth associated with a revised STR/SS1 and removal of STR/SS 3 from the plan. The modelling work (PS_047, PS_048, and PS_049) has been published as part of the stage of the examination, and includes a modal shift strategy including a Bus Feasibility Study (PS_058).</p> <p>The Five Oak Green Bypass will not be necessary now that the Council's proposed changes have resulted in the removal of TGV (STR/SS 3) from the plan.</p>
86-1	Charles Rosenmeyer				Appendix E: Proposed changes to policy STR/SS 3: The Strategy for Tudeley Village		Support the removal of Tudeley Garden Village from the Plan.	This is noted.
92-1	Greg Clark MP				Appendix E: Proposed changes to policy STR/SS 3: The Strategy for Tudeley Village		Due to the time taken since the receipt of the Inspectors letter, would have expected the Council to have considered where the additional housing should go as a result of the deletion of Tudeley Garden Village. Failure to do so results in further uncertainty for the borough and the need for an immediate review.	The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.

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								The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS_054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.
113-1	Alan Chilvers	Residents of Golden Green Association & KeepKent.Green			12 Conclusions on preferred development strategy option		Welcomes the removal of Tudeley Garden Village from the Local Plan.	This is noted.
126-1	Margaret Borland				3.4 Issue area A: Location and Accessibility		<p>Support the removal of Tudeley Garden Village and concern with regard to the RAG ratings in the RAG Assessment. Also;</p> <p>Agree that walking to Tonbridge from Tudeley Garden Village would be impractical.</p> <p>Concern over cycle routes not being on dedicated cycleways.</p> <p>Query whether realistic for cyclists to cycle to Tonbridge and then commute onwards by train.</p> <p>No cycle access proposed to the Key Employment Areas or retail/leisure destinations.</p> <p>The lack of a railway station proposed for Tudeley raises questions over sustainability.</p>	<p>Support for removal of TGV from the plan is noted.</p> <p>The DSTPA (PS_054) sets out how the Council has sought to resolve matters raised by the Inspectors Initial Findings, and as a result make revisions to the SLP to accommodate changes.</p> <p>Highways Modelling has been undertaken to review the impact from growth associated with a revised STR/SS1 and removal of STR/SS 3 from the plan. The modelling work (PS_047, PS_048, and PS_049) has been published as part of the stage of the examination, and includes a modal shift strategy including a Bus Feasibility Study (PS_058).</p> <p>Access to the Key Employment Area in Paddock Wood has been assessed as part of the options for sustainable transport. The site will be connected to the rest of the town by the existing network of paths, and via new cycle and</p>

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							<p>Unclear information about the costings of the 205 bus service.</p> <p>No proposals for direct bus services from Tudeley to Tunbridge Wells or to the general hospital.</p> <p>All of the above raise into question the sustainability and expected modal shift for Tudeley Garden Village.</p>	<p>footways designed into development areas as they come forward. The TW Local Plan Stage 3 Modal Shift Impact Reporting (PS_049) indicates a modal shift toward sustainable modes (walking, cycling, and bus use) of between 4% to 9%.</p>
134-2		National Highways (formerly Highways England)			3 Review of the proposal for a new garden village at Tudeley		<p>National Highways consider that the amended Plan is sound in regard to the review of the proposal for a new garden village at Tudeley. It is understood that the removal of Tudeley Garden Village has been reflected in the scoping work for the revised transport modelling and the subsequent Stage 2 modelling exercises. The analysis and conclusions drawn from this work in relation to the wider Local Plan are therefore considered to meet the requirements of the 'justified' test and the 'effective' test.</p>	<p>This is noted.</p>
152-5	Save Capel				3 Review of the proposal for a new garden village at Tudeley		<p>Save Capel consider that the proposed changes to the development strategy is unsound in regard to the further consideration of TGV, and make the following comments;</p> <ul style="list-style-type: none"> • SC reiterates its support for the removal of TGV, though remains concerned by comments by TWBC that suggest that TGV still has merit and may therefore be an option to be re-introduced at a later date. • SC therefore wish to re-enforce the point that TGV will never be a sustainable or desirable element of the TWBC Local Plan. 	<p>As part of the Councils response to the Inspectors Initial Findings a review of TGV has been undertaken which is outlined in the DSTPA (PS_054) where at 3.75 the council states 'An important point to note in considering the way forward is that the Inspector does not say that he has considered all the matters and finds the proposal for a new settlement at Tudeley Village unacceptable in planning terms. Rather, he identifies a number of Page 23 of 87 Tunbridge Wells Borough Council Local Plan Development Strategy Topic Paper – Addendum Date of publication – January 2024 Revision: 4 areas where he is not satisfied that the evidence provided is sufficient to justify the proposal in the context of the needs for “exceptional circumstances” for development in the Green</p>

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							<ul style="list-style-type: none"> • Save Capel have set out detailed reasons as to why this is the case, which are set out in detail in their response and are included in other consultation points but in summary include the following issues; <ul style="list-style-type: none"> ○ any such proposal would result in the loss of up to 170 Ha of GB which includes significant productive arable farmland, much of which is G2. Parts of the site are directly adjacent to flood plains as well as AONB whose setting and views would be harmed. ○ There is no viable plan for rail access and no new evidence that it would be viable has been demonstrated. TGV would be a community split by a railway line. ○ The site has topographical issues ○ There is no community infrastructure near the proposed site. 	<p>Belt, especially given that the development is assessed as resulting in 'High' harm to it.'</p> <p>The support for the removal of TGV noted.</p>
152-6	Save Capel				3.4 Issue area A: Location and Accessibility		<p>Save Capel consider that the proposed changes to the Local Plan are not sound in regard to Issue Area A: Location and accessibility and raise the following;</p> <ul style="list-style-type: none"> • Save Capel support the view of the Inspector that it would be unrealistic to expect a significant number of people to cycle from TGV to Tonbridge, especially in the darker, winter months or during bad weather. • Concerns in relation to the Stantec work - Dispute the assertion that Tonbridge is within the reasonable 2 mile cycling distance from TGV. This is just a measurement to the edge of Tonbridge rather than a meaningful location like the train station which is nearly double that distance. Also dispute the 	<p>The Inspectors Initial Findings letter raises a number of issues specifically that required consideration. The Council has undertaken this work as set out in the consultation documents that have been published.</p> <p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128) as well as the revised position within the Development Strategy Topic Paper Addendum (PS 054). The Council has also undertaken a Stage 3 Green Belt study following the Inspectors Initial findings for all reasonable alternatives within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p>

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							<p>assertion that the route is flat - it does in fact have a gradient. Also a theoretical route rather than an actual route has been considered and there are questions over this in terms of consent of use of the route and flood risk concerns. Also dispute that inclement weather is not a deterrent to people cycling.</p> <ul style="list-style-type: none"> • It is also raised that if TGV was ever to be re-considered as a proposal, TWBC and the Hadlow Estate would need to address other critical location and accessibility shortcomings identified by the Inspector and SC, including bus routes, the absence of a new railway station for TGV, the need to create retail and commercial facilities from scratch and the existing road congestion in Tonbridge and PW would worsen if TGV were ever built. • Re-iterate the concern that TWBC may reconsider bringing forward TGV at a later date but SC consider that this is not appropriate or justified. 	<p>Undertaking further Call for Sites, and their review will be undertaken as part of the Council's commitment to an early review of the plan.</p>
152-7	Save Capel				3.5 Issue Area B: The Five Oak Green Bypass		<p>Save Capel consider that proposed changes to the Local Plan to be unsound in regard to the Five Oak Green Bypass and have the following points to make;</p> <ul style="list-style-type: none"> • The Five Oak Green Bypass is not viable until the Inspectors four key concerns have been addressed which include - Proximity to Capel Primary School, Visual Impact, Funding, phasing and deliverability and legal difficulties associated with multiple land ownership. • Even if the Five Oak Green Bypass was made viable, the primary route in and out of TGV would remain the B2017 towards the A26 and all the traffic 	<p>The DSTPA (PS_054) sets out how the Council has sought to resolve matters raised by the Inspectors Initial Findings, and as a result make revisions to the SLP to accommodate changes.</p> <p>Highways Modelling has been undertaken to review the impact from growth associated with a revised STR/SS1 and removal of STR/SS 3 from the plan. The modelling work (PS_047, PS_048, and PS_049) has been published as part of the stage of the examination, and includes a modal shift strategy including a Bus Feasibility Study (PS_058).</p> <p>The Five Oak Green Bypass will not be necessary now that the Council's proposed</p>

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							<p>hotspots would be gridlocked with the additional traffic flow created.</p> <ul style="list-style-type: none"> • There are significant concerns with regards to modal shift to cycling due to the gradients/topography in and around the area, which cannot be mitigated against. • It is wrong to consider bringing forward TGV at a later date and any consideration of TGV must go back to the start of the planning process. 	changes have resulted in the removal of TGV (STR/SS 3) from the plan.
152-8	Save Capel				3.6 Issue Area C: Deliverability		<p>In terms of deliverability, Save Capel state, that should TGV ever re-emerge as a proposal, the following critical deliverability issues highlighted by the Inspector would need to be resolved in advance;</p> <ul style="list-style-type: none"> • The justification of Exceptional Circumstances • The absence of similar or comparable housing schemes in Tunbridge Wells • The lack of 'any prior experience' of either TWBC or Hadlow Estates in delivering a scheme of this size and complexity. <p>this size or complexity".</p>	<p>The Inspectors Initial Findings letter raises a number of issues specifically that required consideration. The Council has undertaken this work as set out in the consultation documents that have been published.</p> <p>The Council has set out the Borough wide development strategy with the Submission Local Plan 2021 (3.128) as well as the revised position within the Development Strategy Topic Paper Addendum (PA_054). The Council has also undertaken a Stage 3 Green Belt study following the Inspectors Initial findings for all reasonable alternatives within or partly within the GB. This therefore sets out how the Council's approach has fully assessed the various alternatives to justify the proposed site allocations put forward within the GB.</p> <p>Undertaking further Call for Sites, and their review will be part of the Council's commitment to an early review of the plan.</p>
153-3	Fernham Homes		Danielle Dunn		3 Review of the proposal for a new garden village at Tudeley	The site known as 'Land at Tolhurst Road' should be included in the Submission Local Plan as a residential site allocation	<p>Review of the proposal for a new garden village at Tudeley - Legally non-compliant/unsound:</p> <ul style="list-style-type: none"> • NPPF para 146 sets out - Before concluding exceptional circumstances to justify changes to Green Belt boundaries, LPAs should demonstrate 	The Development Strategy Topic Paper (Core Document 3.126) explains at Section 6.0 how the development strategy has been developed (for the Pre-Submission Local Plan) and this has been considered at the previous hearing session – Matter 3, Issues 1 and 2 Spatial Strategy and Distribution of Development and the Hearing

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							<p>that all other reasonable options for meeting its development need have been fully examined</p> <ul style="list-style-type: none"> • For SHELAA site 143 – Tolhurst Road, the SA (PS_036) states “The site could be considered again if Tudeley Village is removed from the Development Strategy (as part of a Local Plan review). “This site is considered suitable as a potential site allocation” • Document PS_054, para 3.78 states if Tudeley Village is withdrawn from the Local Plan, identified alternative sites in Green Belt would not provide a meaningful quantum of housing supply - However, the removal of Tudeley Village and reduction in numbers at Paddock Wood should lead to deliverable/suitable sites identified in the SA coming forward in the current SLP. TWBC’s approach of not considering such sites as part of a Local Plan review is flawed and not justified. 	<p>Statements TWLP/014 and TWLP/015 respectively.</p> <p>The Development Strategy Topic Paper Addendum (PS_054) explains the revised development strategy following the Inspector’s initial findings, and this will be discussed at future hearing sessions.</p> <p>Regarding SHELAA site 143, this is included in the SHELAA review of Green Belt sites (PS_036). The SHELAA site assessment sheet for the site acknowledges the Low harm rating and that the site is suitable as a potential allocation. It further identifies that the site could be considered as part of the proposed Local Plan review. As set out in the original SHELAA main report (Core Document 3.77) at para 1.3 the SHELAA is not an allocations document; it does not form Council policy but provides a technical assessment of the potential of sites for allocation for future land supply. As such, it informs the plan-making process, but its findings must be considered alongside the other evidence in determining site allocations to be included in the new Local Plan.</p> <p>If the Council were to seek to include additional site allocations at this stage, it would be necessary for the Council to first consider whether there are alternative Brownfield/ non-Green Belt sites suitable for allocation in the first instance, which would be best done through a further Call for Sites, and consideration of an alternative development strategy for the borough as a whole, thereby delaying adoption of the Local Plan further. The Council submits that the most suitable way forward is to progress the Local Plan with a 10 year housing land supply, with a commitment to an early review of the Plan.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to Policy STR/SS 3 The Strategy for Tudeley Village

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.</p> <p>The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS_054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.</p>
154-4	Nick and Hilary Andrews				3 Review of the proposal for a new garden village at Tudeley		Policy STR/SS3: Concur with removal of Tudeley Village - as evidence not forthcoming to demonstrate soundness in terms of deliverability, transport, infrastructure, the pressure on neighbouring Tonbridge and unjustified removal of Green Belt. Should be a permanent decision.	This is noted.
160-2	Susan Marchant				Appendix E: Proposed changes to policy STR/SS 3: The Strategy for Tudeley Village		Strongly support the deletion of Tudeley Village from the Local Plan.	This is noted.
167-2		Bellway Homes Strategic	David Murray-Cox	Turley	3 Review of the proposal for a new garden village at Tudeley		Welcome removal of Tudeley Village - allocation was never shown to be a sustainable, developable and viable solution for delivering new homes during the Plan period, and revisions made to	This is noted.

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							<p>Strategy for Paddock Wood/land at east Capel.</p> <p>Assume Local Plan is to be considered against the NPPF 2021.</p>	
168-1		Castle Hill Developments Ltd	Douglas Bond	Woolf Bond Planning	Appendix E: Proposed changes to policy STR/SS 3: The Strategy for Tudeley Village	<p>We note the amendment to the plan to now relate to a 10-year plan period. This clearly is in conflict with the NPPF at paragraphs 22 and 69. This national guidance highlights the importance of a plan lead system and the need to plan with varying degrees of certainty over the medium to long term. This is particularly important having regard to the nature of different development requirements, the need for these to be planned and delivered bearing in mind the long lead times required to deliver strategic development. This includes not only housing but also education and employment in order to create a sustainable and interrelated land use strategy for the borough. In other words, the failure of the plan to look beyond a 10-year plan horizon will impede on planning for the immediate future. The time taken for a local plan review and then implementation of a subsequent allocation strategy may lead to development needs being delayed when they are needed the most. For these reasons, if the plan is not to cover a minimum of 15 years from adoption with appropriate allocations to support the variety of different land use requirements that arise within this period it is essential that this matter is addressed through an</p>	<p>Proposed changes to the plan are considered to make it both legally compliant and sound in respect of the following;</p> <p>the removal of Tudeley Garden Village in this plan or in the immediate review. However the fact that the plan now has a 10 year period means it is in conflict with the NPPF at paragraphs 22 and 69 and must therefore provide a firm commitment to immediate review.</p>	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'.</p> <p>The proposed early review of the Local Plan will allow the Council to investigate ways of meeting the identified housing needs for the period after 2034, as explained in the Local Plan Development Strategy Topic Paper Addendum dated January 2024 at section 14 [core document PS_054]. This approach is not in conflict with paragraph 69 of the NPPF, which requires only that planning policies should identify a supply of specific, developable sites or broad locations for growth "where possible" for years 11-15 of the remaining plan period.</p>

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						<p>immediate local plan review. The importance of this issue is such that it should be enshrined within development plan "uppercase" policy. Without this, the decision to curtail the current local plan and its medium/long-term development strategy on the basis of a local plan review lacks any teeth and commitment. It should represent development plan policy that transgresses local council administrations for the benefit of the borough and its residents as a whole. A similar issue has arisen in Barnet in respect of their Local plan. The Inspectors' published interim findings and next steps in August 2023 stated.</p>		
173-1		Hadlow Estate	Tom Ashley		3 Review of the proposal for a new garden village at Tudeley	<p>2 TGV – Making the Plan Sound The Estate's principal position is that the inclusion of TGV in the development strategy would resolve the critical infrastructure deficiencies noted above that are arising from the revised development strategy and render the plan sound. The Estate urges the Inspector and TWBC to revisit the Initial Findings in light of the further evidence that has been produced and to reinstate TGV as an allocation.</p>	<p>The Hadlow Estate consider the proposed changes to the Local Plan in regard to STR/SS3 - Review of the proposal for a new garden village at Tudeley to be neither legally compliant or sound and have raised the following;</p> <ul style="list-style-type: none"> The Hadlow Estate request that TWBC and the Inspector revisit the proposed removal of TGV as it renders the plan fundamentally unsound. It is considered illogically and unsound to not meet the Plans needs in full and to abandon the proposals for TGV. It is not appropriate to only meet 10 years of need in the plan and will be the subject of an early review. It is highlighted by the HE that there are no other green Belt alternative sites to meet the need and no other sites suitable through the SHELAA process and the Council is confident in its site selection process. 	<p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 68 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period. It is considered that the amended proposals do comply with national policy.</p> <p>The Council has sought to review the matters raised in the Inspectors Initial Findings and considered development strategy options in the DSTPA (PS 054).</p> <p>Housing supply for the 1-10 year period is adequate to meet the identified need for these years as set out in the revised trajectory.</p>

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							<ul style="list-style-type: none"> The HE re-iterates its position that there are no planning barriers to TGV's realisation and that exceptional circumstances have been demonstrated and that the removal of TGV is not justified. The removal of TGV, relies on reduced strategic allocations at PW which creates a fundamental unsoundness in a number of respects. Additionally, the Councils additional evidence base prepared confirms the appropriateness of TGV in regard to its location and active travel, public transport, mixed use/internalisation/modal shift/highway impact. HE urges the Inspector and TWBC to revisit the initial findings and reinstate TGV as an allocation in the Local Plan. 	
173-2		Hadlow Estate	Tom Ashley		10 Consideration of development strategy options	<p>3 Amendments to the Plan</p> <p>The revised development strategy has been prepared in response to the direction given by the Inspector in his Initial Findings Letter. However, the revised development strategy is unsound in itself. TWBC accepts that it now only provides a plan to meet the objectively assessed needs of Tunbridge Wells Borough for a 10 year period, with what will be an ineffective infrastructure strategy, and so falls short of the requirements of NPPF paragraph 22. The revised development strategy is thereby not effective, not positively prepared and is not sound. The Estate maintains that TGV should comprise an important and necessary part of the development</p>	<p>Hadlow Estate consider that the proposed changes to the Local Plan are neither legally compliant or sound in regard to the revised Development strategy and the following issues are raised;</p> <ul style="list-style-type: none"> The Inspectors Initial Findings and TWBC's response represent a failure to address issues of beautiful place-making that are at the heart of the Government's national policy. TGV provides proper planning for the future and the short term approach proposed by TWBC will not meet the Borough's housing need in any meaningful way. National Policy has a clear target of plan making for 15 years which the plan is failing to do and not only fails on providing housing but also the necessary infrastructure including 	<p>The Development Strategy Topic Paper Addendum (PS_054) explains the revised development strategy following the Inspector's initial findings, and this will be discussed at future hearing sessions.</p> <p>The Inspectors Initial Findings Letter (document ref: ID-012) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 68 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period. It is considered that the amended proposals do comply with national policy.</p> <p>The Council has sought to review the matters raised in the Inspectors Initial Findings and</p>

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						<p>strategy for the Tunbridge Wells Borough. TGV 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 TGV. The evidence base also demonstrates that there are no alternative sites to meet the shortfall in housing arising from the removal of TGV. It is therefore illogical to remove TGV and represents a failure in the delivery of an effective and sound Local Plan to address the Borough's needs.</p> <p>In addition, as a consequence of removing TGV the development strategy 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 travel provision. The inclusion of TGV can resolve the infrastructure issues and ensure a deliverable and effective infrastructure strategy for the Plan period.</p> <p>The Estate thereby requests that:</p> <ul style="list-style-type: none"> - Policy STR 1 continues to include the requirement for “the development of two strategic sites” and “the creation of a new garden settlement: Tudeley Garden Village between Paddock Wood and Tonbridge”; and - Policy STR/SS 3 is retained in the Plan. <p>It is noted that this approach comprises Option 2 set out in the</p>	<p>education provision and a sustainable and active travel strategy.</p> <ul style="list-style-type: none"> • Hadlow Estate consider that the revised development strategy is unsound and maintains that TGV should comprise an important and necessary part of the development strategy for TWBC and sets out the reasons for this. • By deleting TGV, the strategy is reliant on strategic allocations at PW which is ineffective in terms of secondary school provision and transport infrastructure. • Hadlow Estate request that Policy STR1 continues to include the reference to TGV and Policy STR/SS3 be retained in the plan. • Hadlow Estate re-iterate that there are no significant risks in respect of TGV. • They also state that if TGV is to be removed, then PW should also be removed and re-considered in the early review together in order to provide a holistic approach to planning. There should also be reference in regard to the early review - specifically stating that the review should focus on the delivery of a new settlement at Tudeley, given all of the evidence and work to date which confirms this as an appropriate solution to meeting housing and development needs. 	<p>considered development strategy options in the DSTPA (PS_054).</p> <p>Housing supply for the 1-10 year period is adequate to meet the identified need for these years as set out in the revised trajectory.</p>

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						<p>Development Strategy Topic Paper (PS_054) for which the Authority provides the following commentary: <i>“10.11 This option recognises the sequential test issue highlighted by the Inspector in relation to housing growth at Paddock Wood and east Capel (with no housing proposed in Flood Zones 2 or 3), while still promoting Tudeley Village, with a revised trajectory. Of particular note, the reduction of c1,000 dwellings covered by Policy STR/SS 1, even coupled with the deferral of construction at Tudeley Village, may (if the further work on housing need and supply set out below is accepted) have the clear merit of still providing 15 years’ supply of housing post adoption, albeit with a reduced/marginal buffer (SA Option number 19B)...</i></p> <p><i>10.13 In conclusion, this Option can be seen, objectively, as a potential development strategy, but officers’ judgement is that it still carries significant risks in pursuing at this time, 11 for the reasons set out above – which needs to be weighed in the context of the need to have a Local Plan in place as soon as practicable, to provide the framework for and to promote sustainable growth to meet the identified housing needs.” (emphasis added).</i></p> <p>These representations summarise why there are no “significant risks” in respect of TGV, and any risks are in fact no more than those incident in any Local Plan process,</p>		

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						<p>and where all can be effectively managed and resolved. Using the Authority's own calculations, the inclusion of TGV would have clear merit of still providing 15 years' supply of housing post adoption. TGV would also deliver housing in a community with all the overwhelming virtues of such a settlement.</p> <p>Alternative approach – Removal of Paddock Wood Allocation Without prejudice to the positions set out above and the Estate's position on lack of soundness, if the Authority and Inspector remain minded not to include the allocation of TGV in this plan, then the Estate considers that the Paddock Wood allocation should also be removed and both considered as part of the necessary early plan review that has been identified as essential if TGV is removed. This will ensure that a proper holistic approach to the question of education and transport infrastructure in the proper interests of the planning of the area is taken as part of that early Local Plan review and that the correct decisions are taken about both. It will also avoid the potential for misconceived decisions to be taken in the short term (for example in relation to secondary educational provision) which fail to address the correct solution for a sustainable future, such as the provision of a high-quality secondary school as part of TGV.</p>		

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						<p><u>Alternative Approach – TGV focused review of the Local Plan</u> Without prejudice to the positions set out above and the Estate's position on lack of soundness, if the Authority, and the Inspector, were not minded to include TGV in this Plan on the basis identified or to remove the Paddock Wood allocation as noted above, the Estate considers it essential Policy STR 1 is amended to specifically require the early review of the Local Plan to be focused upon the delivery of a new settlement at Tudeley given all of the evidence and work done to date which confirms this as the appropriate solution. Drawing upon the existing evidence base this review could consider specifically:</p> <ul style="list-style-type: none"> - the secondary school delivery strategy - the sustainable transport strategy for the Paddock Wood - Tonbridge corridor - the transport mitigation strategy for the B2017 corridor - the Exceptional Circumstances for Tudeley Garden Village <p>The Estate suggests the following amended wording to Policy STR1: <i>Following adoption, the Council will undertake an early review of the Local Plan, which will include further investigation of ways of meeting <u>focus on the creation of a new garden settlement at Tudeley Garden Village between Paddock Wood and Tonbridge to meet identified housing needs for the period post 2034.</u></i></p>		

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						<p>The reasoned text should explain that conclusion reflecting, in particular, the Council's stated position in paragraph 3.78 of its own Local Plan Development Strategy Topic Paper – Addendum (December 2023), and so be to the following effect:</p> <p><i>Tudeley Garden Village was withdrawn from allocation in the Local Plan Process to allow for further consideration about it. However, the Council found from the the review of Green Belt alternative sites that those do not suggest any more appropriate site allocations that would provide any meaningful quantum of housing supply. Also, the Council is confident in its SHELAA site assessments and its site selection methodology generally. The Local Plan is only meeting housing needs for the next 10 years and has to be subject to an early review. In light of all the findings on the evidence, the early plan review should therefore focus on the principle of creating a new garden settlement at Tudeley Garden Village given the absence of any other more appropriate site allocations to provide a meaningful quantum of housing supply to address the Council's identified needs after the first 10 years of the Plan.</i></p>		
173-3		Hadlow Estate	Tom Ashley		3.5 Issue Area B: The Five Oak Green Bypass		The proposed changes to the Local Plan are neither legally compliant or sound in regard to Issue area B: The Five Oak	The rationale for the removal of the Tudeley Village is set out within the Development Strategy Topic Paper Addendum (PS_054). In particular, paras 3.75 to 3.78. These sections set

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							<p>Green Bypass and have the following comments;</p> <ul style="list-style-type: none"> • It is noted that noise, safety, air quality and deliverability issues in respect of the FOG Bypass have all been resolved. • It is suggested that there is an unresolved risk in respect of the landscape impact of the proposed Bypass, particularly in respect of the AONB. • TWBC state that it has not concluded that this issue cannot be resolved, rather it is noted that further evidence is required to assess this issue. • This is not considered to be a proper basis for removal of the TGV allocation that it critical to meeting the Borough's needs. • The FOG bypass is not within the AONB and no exceptional circumstances are required. • NPPF para 115 confirms that Local Transport Infrastructure is not inappropriate development in the Green Belt. • Further work can be carried out and is not a reason for proposing deletion of TGV. • TWBC consider that the additional traffic generated by the growth at a reduced Paddock Wood does not necessitate the need for the FOG Bypass. However, HE would question whether this is the case as there would be increased traffic on the B2017 corridor, however TWBC are not planning any infrastructure improvements to cater for this increase, which cannot be sound. • It is also considered that in respect of TGV, there are other alternative mitigation strategies for the B2017 	<p>out the applicable factors which contributed to this change in development strategy.</p> <p>Following the Inspectors initial comments, TWBC have carried out a RAG assessment of the FOG Bypass to understand what would be needed to address the issues raised. This work has raised some uncertainty regarding the potential of resolving the landscape impacts of the bypass as well as the need for further significant work in the form of LVIA etc This contributed to the reasoning for the deletion of the Tudeley Village allocation.</p> <p>The Five Oak Green Bypass is not required in terms of highway impact and improvement need, without the development of Tudeley Village.</p> <p>Further transport related work has been undertaken as part of the Council's response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed.</p> <p>It is expected that this matter will be discussed as part of the future Local Plan Hearings.</p>

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							<p>corridor which could negate the need for the bypass altogether which have not been addressed by TWBC.</p> <ul style="list-style-type: none"> The mitigation strategy for the B2017 corridor has already been considered in sufficient detail to justify the allocation for TGV. The detail of the mitigation could be dealt with through the development management process and is not an issue that undermines the deliverability of TGV in the Local Plan. 	
173-4		Hadlow Estate	Tom Ashley		3.6 Issue Area C: Deliverability		<p>The Hadlow Estate consider that the proposed changes to the Local Plan are neither legally compliant or sound in regard to Issue area C: Deliverability - Policy STR/SS3, and raise the following points;</p> <ul style="list-style-type: none"> Reference to the Council's assessment of delivery and lead-in times and delivery rates of TGV which have been estimated with reference to the Lichfield report 'Start to Finish'. Hadlow Estate maintains that TGV could have quicker lead-in times and delivery rates than the averages set out in the Lichfield Report. Notwithstanding this, Hadlow Estate still consider that the Lichfield Report figures used as a basis for estimation is not in itself basis for removing TGV. It is also re-iterated that it was always the intention that TGV would be delivered over more than one plan period, in accordance with NPPF Para 22. This is not a basis for detracting from the principle of TGV and the Exceptional circumstances for removing it from the Green belt. 	<p>The rationale for the removal of the Tudeley Village is set out within the Development Strategy Topic Paper Addendum (PS 054). In particular, paras 3.75 to 3.78. These sections set out the applicable factors which contributed to this change in development strategy.</p> <p>It is expected that this matter will be discussed as part of the future Local Plan Hearings.</p>

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							<ul style="list-style-type: none"> To summarise - even if fewer units would be delivered at TGV during the plan period, this would not be justification for removing it as an allocation in the Local Plan. 	
173-6		Hadlow Estate	Tom Ashley		3.4 Issue area A: Location and Accessibility	<p>2 TGV – Making the Plan Sound 2.2 Sustainable and Active Travel Strategy The inclusion of TGV would facilitate the realisation of the Bus Rapid Transit Light system along the corridor between Paddock Wood and Tonbridge, which would support the long-term viability of the proposed Paddock Wood Circular route. The delivery of TGV over the long term would also comprise a significant uplift in public transport choice and availability along this route, making the route more attractive. Critically, the delivery of TGV would increase patronage along this corridor, which would assist with the long-term viability of these bus services. This is supported by the Council's own evidence base (PS_058 TW Bus Feasibility Technical Note) which concludes: <i>"9.1.12. The study concludes that the proposed level of development across the TWBC area, and at the Strategic Sites of Tudeley Garden Village and Paddock Wood (including East Capel), will support significant expansion of the local bus service network across all corridors within the study area.</i> <i>9.1.13. It is considered that the level of development planned within the TWBC area will require</i></p>	<p>The proposed changes to the Local Plan in regard to STR/SS3 - Issue area A:Location and Accessibility is considered to be neither legally compliant or sound in regard to the following;</p> <ul style="list-style-type: none"> With the removal of Tudeley Garden Village, the sustainable and active travel infrastructure and services which were proposed to run along the Paddock Wood - Tonbridge corridor have also been removed altogether, meaning the revised development strategy h now had to attempt to create a revised sustainable and active travel strategy which is now dependent on existing train service and either walking or cycling and a new PW circular bus service. It is considered that the new bus service proposed would be unviable due to low level of patronage and therefore the revised strategy is unsound. Also uncertainty about some of the evidence base, including modelling and mode shift which lacks clarity and the full modelling reports should be made available and more detailed evaluation of the transport impacts should be carried out. Hadlow Estate contends that the revised development strategy is not sound. In particular, the secondary education provision strategy and sustainable travel strategy are both ineffective. In addition, there are fundamental uncertainties arising from the highways traffic 	<p>The Council has undertaken a bus study and feasibility review of services (Paddock Wood Bus Service Options PS_041 & Tunbridge Wells Public Transport Feasibility Study Review PS_040) to understand what enhancements can be delivered. The Council also undertook a Local Cycling and Infrastructure Plan (LCWIP) (see 3.115 on the Core Documents list), which formed part of the evidence for the Submission Local Plan 2021 (3.128).</p> <p>As part of the revised strategy for the Strategic Sites, the Council has reviewed the sustainable connections in light of the proposed removal of the Tudeley Village allocation. This work is set out within the Provisions for Sustainable Active Travel paper (PS_053). It is also important to highlight that the LDS includes the production of a Local Cycling and Walking Infrastructure, and Low Traffic Neighbourhoods SPD which would formally update the LCWIP measures.</p>

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						<p><i>significant expansion of the bus service network to provide additional capacity to serve the demands created by new development and to deliver an attractive, viable, and sustainable alternative to private car use in line with current KCC policy on sustainable travel strategies.</i></p> <p><i>9.1.14. The study undertaken, albeit at a high level initially, demonstrates that there are credible and viable options for public transport available within the TWBC area and that these will support the developments coming forward across the 2022/23 to 2037/38 period.</i></p> <p><i>9.1.15. The application of new bus priorities measures will ensure that local bus service improvements move to a higher level of quality and meet those criteria required to be recognised as a BRT system in the medium to long term, replicating the considerable success that KCC has had through its Fastrack BRT system in other areas of the County.</i></p> <p><i>9.1.16. A high frequency local bus network, embedded from day one, has the potential to lower private car use across the study area (in particular from new developments such as those at Paddock Wood, East Capel, and Tudeley Garden Village), build on the reasonably dense local bus network already in existence, improve significantly key links between principal towns and provide much higher levels of access to local employment, social and leisure activities for existing</i></p>	<p>modelling which undermines the robustness of the highway infrastructure improvement strategy, particularly with respect to the B2017 corridor. There are fundamental uncertainties in respect of the cost of the Colts Hill bypass.</p> <ul style="list-style-type: none"> • It is considered that the Local Plan could be made sound through the inclusion of TGV and the realisation of the Bus Rapid Transit Light system along the corridor between Paddock Wood and Tonbridge, which would support then long term viability of the proposed PW circular bus route. 	

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						<i>and new residents whilst providing an equivalent frequency connection to local rail services which will ensure high levels of multimodal integration and significant mode switch to bus/rail modes.”</i>		
173-7		Hadlow Estate	Tom Ashley		5 Transport related matters		<p>The proposed changes to the Local Plan are not considered to be either legally compliant or sound in regard to transport related matters and the following comments are made;</p> <ul style="list-style-type: none"> • B2017 Mitigation - in light of additional modelling evidence, there is no good reason why measures along the B2017 corridor have not been identified in support of the proposals at Paddock Wood despite increased trips, traffic calming measures at Five Oak Green are not referenced and no proposed bus service enhancements. The development strategy should explicitly include a requirement for mitigation B2017 corridor in support of the PW strategic allocations. • Colts Hill Bypass - Noted that the cost of the Colts Hill Bypass has been reduced from £20,000,000 to £7,250,000 with little evidence to explain this reduction in cost. The absence of this explanation is unsound as it appears to be fundamentally the same scheme as proposed previously and the implications could be significant for the viability and deliverability of required infrastructure. 	<p>The Council has undertaken a bus study and feasibility review of services (Paddock Wood Bus Service Options PS_041 & Tunbridge Wells Public Transport Feasibility Study Review PS_040) to understand what enhancements can be delivered. The Council also undertook a Local Cycling and Infrastructure Plan (LCWIP) (see 3.115 on the Core Documents list), which formed part of the evidence for the Submission Local Plan 2021 (3.128).</p> <p>As part of the revised strategy for the Strategic Sites, the Council has reviewed the sustainable connections in light of the proposed removal of the Tudeley Village allocation. This work is set out within the Provisions for Sustainable Active Travel paper (PS_053). It is also important to highlight that the LDS includes the production of a Local Cycling and Walking Infrastructure, and Low Traffic Neighbourhoods SPD which would formally update the LCWIP measures.</p>
174-4	Malcolm Dorrington				3.3 Review of the proposal in light of the		[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the	This is noted.

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
					Inspector's initial findings		Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	
190-1 (received after the close of the consultation)		Network Rail			3.4 Issue area A: Location and Accessibility		<p>Network Rail maintain the view that the scale of development proposed at Tudeley would not constitute rail interventions in regard to service provision or a new rail station.</p> <p>Network Rail would support improved bus, walking and cycling routes to existing rail stations.</p>	This is noted.