



Our ref: NH/24/04559
Your ref: Tunbridge Wells Borough Local Plan –
Response to Inspector’s Initial Findings
Consultation

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26 February 2024

FAO: Ellen Gilbert
Planning Policy Manager
Tunbridge Wells Borough Council

Dear Ellen,

**Tunbridge Wells Borough Local Plan: Response to Inspector’s Initial Findings
Consultation**

Thank you for inviting National Highways (NH) to comment on the Tunbridge Wells Borough Local Plan: Response to Inspector’s Initial Findings Consultation (January 2024), seeking a response by no later than midnight on 26 February 2024.

We have read the Guidance and Explanation Note. We understand that comments are sought on the proposed response by Tunbridge Wells Borough Council (TWBC) to the Inspector’s Initial Findings. We also understand that the public consultation is being undertaken as part of the Examination process at the request of the Local Plan Inspector and, as such, this consultation is a non-statutory consultation which is not covered by the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2021 (as amended).

We appreciate that the focus of this consultation is on whether the proposed response to the initial findings makes the submitted Local Plan **legally compliant** and **sound**. We recognise that compliance with the Duty to Co-operate does not apply after a Local Plan has been submitted for independent examination.

Policy Context

NH is the company responsible for the Strategic Road Network (SRN), with our focus being on its safety, reliability and operational efficiency.

The policy of the Secretary of State for Transport in relation to the SRN is **Circular 1/2022: [Strategic road network and the delivery of sustainable development](#)**. In responding to this consultation, NH has taken Circular 1/2022 as relevant national policy.

In addition, the policy context for our response includes the Government's [National Planning Policy Framework](#) (NPPF) (December 2023).

NH has recently updated its '[Planning Guide](#)' (October 2023) which sets out how the company engages with the planning system, including plan-making. This was updated in the context of 01/2022.

In terms of plan-making, our engagement is focused on exploring opportunities to reduce the reliance on the SRN for local journeys including a reduction in the need to travel and maximising opportunities for walking, wheeling, cycling, public transport and shared travel.

Consultation Material

In terms of the consultation material, our response focuses on the Local Plan transport modelling, including:

- PS_041 – Paddock Wood Bus Service Options
- PS_047 – TW Stage 1 Technical Note – Review of Strategic Model Methodology and Set Up for Local Plan
- PS_048 – TW Local Plan Stage 2 Reporting
- PS_049 – TW Local Plan Stage 3 Modal Shift Impact Reporting
- PS_053 – Provisions for Sustainable Active Travel
- PS_059 – Tunbridge Wells Local Plan – Stage 3 Part 2 Outcomes November 2023
- PS_060 – Paddock Wood and east Capel Access and Movement Report
- PS_063 – Summary of Proposed Modifications to the Development Strategy, following Inspector's Initial Findings in November 2022.

Our response considers whether the proposed response of TWBC, with particular reference to the above listed documents, makes the submitted Local Plan sound. We have focused on the following three soundness tests, as set out in para.35 of the NPPF:

(b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

(c) **Effective** – deliverable over the plan period, and based on efficient joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

(d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Our response does not address the matter of legal compliance or the ‘positively prepared’ soundness test.

Engagement with Evidence Preparation

We are mindful that TWBC has engaged with NH positively and in an on-going way on pieces of evidence that now form part of the consultation documents (see above list).

We have responded to these engagements with feedback. Our response to this consultation reflects the progress made with Local Plan transport evidence and our current position.

For the benefit of the Inspector’s understanding of the representations set out below in Table 1, our Technical Note to the TWBC in response to the Stage 3 (Part 2) – Tunbridge Wells Local Plan Transport Assessment (PS_059) is appended to this response (see Appendix A). This was shared with TWBC on 19 December 2023. The outstanding points which we have identified as requiring further action are in bold and underlined. This Technical Note also highlights engagement outcomes on earlier stages of the Transport Assessment work. This position has informed the representations set out below.

A summary of NH’s position concludes the response.

Soundness

Question 4 in the representation form asks:

Do you consider the proposed changes to the Borough Local plan Submission Version (2020-2038) would make it sound?

The 'proposed changes' are those that feature PS_054 Development Strategy Topic Paper Addendum January 2024.

Table 1 (below) sets out National Highways representations on the proposed changes consultation documents, with reference to the soundness tests.

Table 1: National Highways' representations

NH Rep. No.	Proposed Change	Soundness Tests	NH response
NH001	Overview of proposed changes	Justified	<p>The proposed amendments to the submitted Plan would entail a substantial reduction in the number of homes to be provided on allocated sites, and a smaller reduction in employment land allocations. The inclusion of a new site as an allocation relates to a development which has already secured a positive planning committee resolution and as such has already been the subject of separate assessments of impact via its TA report.</p> <p>The reduction in dwellings and employment land means that, in comparison to the submitted Plan, fewer person</p>

NH Rep. No.	Proposed Change	Soundness Tests	NH response
			<p>trips overall can reasonably be expected to be generated by the remaining allocations. However, this also means that the financial value of either works or contributions toward mitigation measures which can be supported by the remaining allocations will be less than for the submitted Plan. It is therefore necessary for a consideration to be made of the evidence presented within the consultation documents as to whether a credible premise has been put forward in terms of the ability of the updated allocations and other relevant funding mechanisms to mitigate the Plan's impacts.</p> <p>It is noted that one of the proposed amendments would commit the Council to an early review of the plan, including consideration of sites to be delivered after 2034. It can therefore be inferred that the mitigation proposals to be put forward for the current Local Plan sites would principally be intended to mitigate impacts accruing from development taking place before 2034. This needs to be accounted for in the appraisal of the proposed timescales for the delivery of mitigation measures. This further work is needed to demonstrate that this change fully meets the requirements of the "Justified" test.</p>

NH Rep. No.	Proposed Change	Soundness Tests	NH response
NH002	Proposed removal of strategic policy STR/SS 3 (Tudeley Village)	Justified Effective	<p>The removal of the Tudeley Village site is understood to have been reflected in the scoping work for the revised transport modelling (document reference PS-047) and the subsequent Stage 2 modelling exercises (document reference PS-048) and local junction sensitivity testing (document reference PS-059).</p> <p>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 (the updated work is proportionate and appropriate in respect of this proposed change) and the “Effective” test (the updated technical work and modelling reflect changes in demand on the wider networks, including the SRN, resulting from there no longer being significant development growth in this area).</p>
NH003	Revision of the strategic policy STR/SS 1: The Strategy for Paddock Wood and land east	Justified Effective Consistent with National Policy	<p>The proposed revision to strategic policy STR/SS 1 is supported by a significant volume of additional transport work. The majority of the material presented on the evidence base page for this consultation has been the subject of previous discussions with National Highways, as highlighted above.</p> <p>Documents PS-047, PS-048 and PS-059 present the evolution of the most recent highway capacity modelling analysis which identify and address a large number of issues.</p>

NH Rep. No.	Proposed Change	Soundness Tests	NH response
			<p>However, further technical work is required. The outstanding matters requiring further action are set out in our Technical Note to TWBC (see Appendix A to this response). NH continues to engage constructively with TWBC on addressing the outstanding matters that relate to the SRN, in particular the A21 Kippings Cross, Flimwell and A228 (Dumbbell) junctions.</p> <p>We acknowledge that a considerable volume of work has been undertaken to revise the sustainable transport strategies (including specifically the bus strategy) for Paddock Wood and East Capel, both in relation to previous comments from National Highways (and Kent County Council Highways) and specifically to amend the strategy to reflect the changes to the policy which are the subject of this consultation. This is evidenced in documents PS-041 and PS-053, which we have previously commented on (see Appendix A to this response).</p> <p>While, in principle, the proposed amendments to the strategy appear acceptable, we are awaiting completion of requested actions to demonstrate the effectiveness of the proposed measures on SRN trips (See Appendix A to this response), and as such our conclusions at this stage are not finalised.</p> <p>We have noted that there is a document, PS-060, which appears to bring together information presented in other documents to provide a concise overview of the expected</p>

NH Rep. No.	Proposed Change	Soundness Tests	NH response
			<p>transport requirements for these sites as they are currently understood. We have not been asked to review this document independently and, in preparing this response, we have identified that the document does not address the outstanding detailed questions from our previous consultations with TWBC.</p> <p>We would like to be clear that our engagement with the TWBC on resolving these matters is constructive and on-going.</p> <p>Given the current position, this proposed change does not, at present, sufficiently meet the requirements of the “Justified” and “Effective” tests of soundness because there are outstanding matters relating to the evidence base supporting it (Transport Assessment – see Appendix A).</p> <p>However, it is our view that these matters are resolvable.</p> <p>In terms of being “Consistent with National Policy”, the work to date (scoping of the modelling and other technical work) has met the requirements of this soundness test. However, until the transport evidence addresses our outstanding points (see Appendix A), including how the “monitor and manage” framework will be tied to particular transport infrastructure and improvements (see Circular 01/2022), this proposed change does not sufficiently meet the requirements of the “Consistent with National Policy” test of soundness. As highlighted above, these matters are resolvable and National Highways will continue to engage</p>

NH Rep. No.	Proposed Change	Soundness Tests	NH response
			with TWBC on a constructive on-going basis to address these points.
NH004	Revision of site allocation policy AL/HA 5: Land to the north of Birchfield Grove, Hawkhurst	Justified Effective Consistent with National Policy	<p>The proposed allocation of the Birchfield Grove site does not alter the fact that this site has been approved (subject to the completion of a Section 106 legal agreement) and as such has been previously appraised through the planning application process, with any necessary mitigations secured via that route.</p> <p>On this basis, it is considered that this proposed change sufficiently meets the requirements of the “Justified”, “Effective” and “Consistent with National Policy” soundness tests.</p>
NH005	Removal of site allocation policy number AL/HA 8: Limes Grove (March’s Field)	Justified Effective	<p>Our observations in relation to the removal of this site are the same as those previously set out in relation to the proposed removal of the Tudeley Village strategic site (see above, NH002 representation).</p> <p>It is considered that the most recent supporting transport modelling work incorporates appropriate revised assumptions and, as such, this proposed change sufficiently meets the requirements of the “Justified” and “Effective” soundness tests.</p>
NH006	Progression of a 10-year housing land supply position including the requirement for	Justified Effective	Our focus on is highway and transport matters. However, should an immediate review commence after adoption, the evidence base would need to respond effectively to the

NH Rep. No.	Proposed Change	Soundness Tests	NH response
	an immediate review of the plan	Consistent with National Policy	<p>expectations of national policy relating to the SRN and wider transport matters at that time.</p> <p>We would like to emphasise that a commitment to a review is not sufficient if it is to be used as a reason to defer resolution of the outstanding technical matters highlighted in our response to this consultation which are necessary to ensure the soundness of the Plan.</p>

Concluding Comments

Thank you for engaging with NH on this consultation.

We recognise that TWBC has engaged with NH constructively, actively and on an ongoing basis on the transport evidence that has informed the proposed changes.

In summary, it is our view that the set of proposed changes that relate to or impact on the SRN and transport matters (see Table 1, above) does not make the Submission Version (2020-2038) sound. This is because certain pieces of transport evidence supporting some of the proposed changes is not yet sufficiently detailed (i.e. not yet meeting the requirements of the “Justified” test – see Appendix A for outstanding matters that need to be resolved). As such, it is not possible to determine whether the proposed mitigation measures supporting some of the proposed changes would be “Effective”. Further work is also required to demonstrate that “Consistency with National Policy” (Circular 01/2022 – Monitor and Manage) would be achieved.

However, a number of elements of work are on-going, and at present we do not have any reason to believe that the outstanding matters will not be resolved. We are committed to working with TWBC and their consultants to achieve this prior to the main modifications’ consultation (assuming that the decision ultimately is to proceed to that stage) so that the remaining evidence and our assessments can be included in that consultation process. Ideally, we would like these matters to be resolved ahead of any examination hearing sessions on these matters.

If you have any questions with regards to the comments made in this response, please do not hesitate to contact us via PlanningSE@nationalhighways.co.uk

Yours sincerely



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Appendix A

National Highways' Technical Note on Transport Evidence (18/12/23)

Tech Note

Spatial Planning Framework Commission

Job number:	K186	
Job title:	Tunbridge Wells Local Plan	
To:	Kevin Bown	cc:
Topic:	Stage 3 Part 2 reporting – Tunbridge Wells Local Plan	
	Prepared:	Checked/Approved
Name:	Hazel Morton / Nigel Walkden	Derek Jones
Date:	18/12/2023	18/12/2023

Throughout this response any **ACTION POINTS** for the applicant are shown as **bold underlined**.

Introduction

- 1 National Highways has been consulted on 29 November 2023 by Tunbridge Wells Borough Council (TWBC) in relation to additional materials associated with the Transport Assessment (TA) for the emerging Tunbridge Wells Local Plan which is being prepared by SWECO on behalf of TWBC. The email requests that National Highways review and provide comment on the following documents:
 - A Technical Note titled “Tunbridge Wells Local Plan - Local Junction Capacity Sensitivity Testing Technical Note” dated 28 November 2023

Background

- 2 National Highways has been working with TWBC to assess the impact of the Local Plan on the strategic road network (SRN) for many years.
- 3 JSJV understands that there have been two public consultations under Regulation 18 of the Local Planning regulations, which relate to the preparatory stages of Local Plan preparation. The first was on the Issues and Options in 2017, and the second on a Draft Local Plan in 2019. A third public consultation on the Local Plan, related to a Regulation 19 Pre-Submission Local Plan took place in 2021.
- 4 The Submission Local Plan, Sustainability Appraisal, and Submission Core Documents along with representations received through the Regulation 19 Pre-Submission Local Plan Consultation were submitted to the Secretary of State for Independent Examination on 1 November 2021.

Statement of Common Ground

- 5 JSJV understands that there is an existing Statement of Common Ground (SoCG) between National Highways and TWBC, dated July 2022. The following statements have been extracted from the SoCG:
- *“NH and TWBC agree that the (strategic policy) in the Submission Local Plan Policy STR6: Transport and Parking is appropriate and in accordance with the NPPF. It provides a comprehensive approach to transport provision, which offers choice and prioritises a) active travel and then b) public transport whilst ensuring that c) there are necessary improvements to the existing highway network and infrastructure to mitigate and address the impact of development.”*
 - *“NH and TWBC agree that the evidence base for the local plan has been subject to robust sensitivity testing, and the conclusions of this testing demonstrate that the approach taken, and mitigation measures identified are – at the plan making stage – proportionate, appropriate, deliverable and accord with the NPPF. NH considers that the transport strategy set out in the Submission Local Plan, and mitigation measures proposed, are acceptable.”*
 - *“NH and TWBC recognise and acknowledge that there will be a need to work very closely to deliver some elements of the mitigations, including some which relate to active travel, and commit to doing so, including with neighbouring authorities such as Tonbridge and Malling Borough Council, where relevant.”*

Recent Updates

- 6 In November 2022, the Planning Inspectorate concluded that:
- “A significant amount of hard work has clearly gone into the preparation of the Local Plan which is positively prepared in seeking to meet housing needs despite large areas of Green Belt and the High Weald AONB. The majority of changes required to the submitted Plan are relatively straightforward and the main modifications referred to above should be incorporated into the schedule which is already in preparation. As for the strategic sites, significant changes and/or the preparation of further supporting information is going to be necessary before they can be found sound. At Paddock Wood, I am relatively confident that this can be achieved without fundamental changes to the Plan’s strategy. However, the implications of my initial findings at Tudeley Village could have far greater, consequential impacts on other aspects of the Plan, from infrastructure provision to whether the Plan is able to identify a sufficient supply of housing land.”*
- 7 Considering the issues highlighted above by the Planning Inspectorate, TWBC has made changes to the Local Plan, including altering site allocations, and National Highways has therefore been working with TWBC to re-assess the impacts.
- 8 The Local Plan is currently at the Examination Stage, with TWBC stating that:
- “The Council will undertake and conclude the necessary public consultation by the end of 2023 which will enable any examination Hearings to continue at the beginning of 2024, subject to the necessary notice being given”.*
- 9 JSJV recently provided comment on the “Stage 1 report for the highway modelling around revised growth for Tunbridge Wells Local Plan”, earlier in September 2023. This largely covered the modelling scope for the Tunbridge Wells revised growth in response to the Inspector’s comments. In summary, the response stated that:
- We are content that the existing 2015 strategic model is used. However, should the work undertaken amount to a significant amount of modelling over a period of time we would like further justification for its continued use when more up to date 2019 based observed data is available either to update the model or for comparison to ensure that the existing model is still sufficiently representative/accurate

- Agreed that traffic flows have returned to or are close to pre-pandemic levels however the cumulative trip purposes, origins and destinations may have changed to some degree
 - Agreed approach to National Trip End Model (NTEM) 7.2 and 8 as two separate scenarios and that no network changes are required
 - Assuming that windfalls are spread across the Borough, we are content that the windfall assumptions will not influence any outcomes for the A21
 - Content with the Reference Case, Local Plan and residential trip rate proposals
 - We look forward to reviewing the Stage 2 and 3 outcomes
- 10 Further responses were received from TWBC on 12 September 2023 and 23 October 2023, reporting on the Stage 2 and Stage 3 part 1 technical exercises. This response included the following:
- “TW Local Plan Stage 2 Reporting” (TW LP Stage 2 report August 2023 Final.pdf)
 - “TW Stage 1 Technical Note – Review of Strategic Model Methodology and Set Up for Local Plan” (Stage 3 Part 1 TN Modal Shift Proposal Final 11.09.2023 Final.docx)
- 11 National Highways provided a response to these documents on 27 September with a series of action points; the following documents were received from TWBC on 23 October and contained material responding to the points raised by National Highways. These documents included:
- A response note prepared by Sweco which addresses previous comments and queries from National Highways on the Stage 3 modelling work;
 - A Sustainable Transport note which provides additional detail on the proposed approach to sustainable transport in the wider Local Plan and at key proposed allocation sites; and
 - A WSP bus study note for Paddock Wood indicating the proposed town bus service specification.
- 12 National Highways provided comments on these additional submissions on 9 November 2023. In summary, this latest response stated the following:
- The locations of the sustainable transport schemes relative to the model zones was confirmed via an updated map, which was considered appropriate.
 - For the merge/diverge assessments, it was considered that the submitted combined evidence is sufficient for National Highways to agree that changes to the current merge and diverge arrangements at the assessed junctions are not required in the context of predicted changes to traffic flows associated with any of the tested Local Plan scenarios.
 - With regard to the A21 / A228 / A264 / Tesco junction (Junction 22), it was requested that a specification for the further modelling of this junction be developed to address the issues identified in the supplied technical note.
 - A similar action was requested with regard to development of a specification for modelling of the A21 / A268 Flimwell Junction.
 - In relation to the Sustainable Travel Note, the submitted additional information was noted to have clarified a number of matters; however, For Royal Tunbridge Wells and Paddock Wood, given the size and importance of these areas, it was considered that, whilst the presented strategy incorporates a number of relevant measures which would be expected in principle to correspond to some reduction in vehicle trips using the SRN, a further layer of analysis is required in order to calculate estimates of the numbers of trips going to and from specific destinations where it can be specifically shown that:
 - a. A feasible alternative for the whole journey exists; and

- b. The journey times for car and the alternative are either broadly comparable, or the alternative offers a benefit in comparison with the car-based journey.
- 13 The current submission responds to these most recent National Highways comments (alongside comments from KCC relating to the local highway network) and represents a further stage in the development of the necessary evidence to support the Local Plan, as described in the introduction to this technical note.

Updated 'strategic road network and the delivery of sustainable development' Circular

- 14 It should be noted that since the start of the consultation process on the TWBC Local Plan, on the 23 December 2022, the DfT released a new circular on the 'Strategic Road network and the delivery of sustainable development' (Circular 01/2022), which replaces all of the policies in Circular 02/2013 of the same name. This report, therefore, pays due cognisance to the prevailing policy.
- 15 More detailed comments relating to the policy requirements of Circular 01/2022 are provided, where relevant, throughout this Technical Note.

Tunbridge Wells Local Plan - Local Junction Capacity Sensitivity Testing Technical Note

Purpose of Note

- 16 The supplied technical note is stated to contain analysis of identified "hotspots" on the local and strategic road networks within Tunbridge Wells, which have been determined through appraisal of data drawn from the "Local Plan High Modal Shift" scenario as presented in the previously submitted material relating to Stage 3 Part 1 of the Local Plan assessment work.
- 17 No specific comments are made with regard to the introductory section of the note, which provides context to the analysis which is similar to our summary above.

Section 2 – Review of Key Strategic Model Outputs

- 18 We are content with the approach to strategic modelling, using the flows for more detailed junction modelling where issues have been highlighted as seen in the Stage 2 reporting. The two scenarios for the Reference Case and Local Plan Mode scenarios 1 and 2 were used to identify hotspots on the road network. Stage 3 takes the Local Plan Mode Shift scenario to examine impacts after trips have been managed down using measures to reduce private car travel in the "High" scenario. **For completeness, we would like to see trip matrix totals for the Reference Case, Local Plan Scenarios 1, 2 and Local Plan Modal Shift scenarios to ensure that the local plan scenario demand has been fully accounted for in the modelling.**
- 19 **It is further noted that the technical note makes no references to the additional work previously requested by NH to support the assumptions around modal shift which have been factored into the "High Modal Shift" scenario. All comments made in this response in relation to the presented data are therefore tentative, subject to the additional work to support the modal shift arguments being completed and supplied to National Highways for review.**
- 20 We note that the KCC letter dated 14 December 2023 makes reference to the need to undertake further testing of a reasonable "worst case" scenario, to reflect a situation where the modal shift

assumed in the high growth scenario is not achieved. Circular 01/22 is clear that assessment of impacts to the SRN should be based on “residual” impacts once the effects of a robust modal shift strategy (to be delivered via the “monitor and manage” or “vision and validate” approach are taken into account; however, we will need to be satisfied that the modal shift strategy will directly benefit the SRN, the evidence for which was described in detail in our previous response dated 9 November 2023. **If this requested additional information is not provided, we will also require a “worst case” test of the impacts to the SRN network and identification of suitable mitigation measures in the manner set out in the KCC letter.**

- 21 **We would additionally concur with KCC that at least one interim year scenario will be required to assist in determining when the proposed mitigation measures are required to be implemented; this should link to any specific “triggers” which result from the delivery of major allocation sites.**
- 22 For the strategic road network, the Stage 2 modelling highlighted two locations where further detailed analysis was required with the modelling suggesting that the junctions would be operating at or over capacity in 2038, namely:
 - A228 Pembury Road/A21
 - A21 Kippings Cross Roundabout
- 23 As stated in our previous response to the Stage 2 reporting it was unclear as to whether the impacts at the former junction were at the roundabouts or the merges and diverges. We also noted the requirement to examine the impacts at the A21 Flimwell junction. Flows have been provided for volumes of traffic through both the A21/A228 and Flimwell that show small percentage increases in total traffic compared to the Reference Case. While this is indicative of total traffic it does not provide the information at the merges and diverges with the main carriageway for the former junction. **Flow differences at the merges and diverges are therefore required (for the slip roads and A21 main carriageway). At Flimwell, flow difference plots are required for each approach compared to the Reference Case. Due to the sensitivity of this junction we will additionally require queue length and delay data as well as any available journey time information to confirm that there are no specific issues at particular points which are masked by the flow difference information.**
- 24 Notwithstanding the above, the data at table 3 indicates that the change in flows at Flimwell Crossroads (junction 58) will be extremely small (2% or less). We are therefore in agreement that, subject to provision and checking of the additional data identified above further assessment of this location is not required.

Section 3 – Overview of Junction Modelling

- 25 Section sets out the approach applied to the use of the local junction modelling data arising from the work described in Section 2 of the technical note. It is stated that “*the findings from the local junction modelling have been used to confirm potential mitigation solutions at the key hotspots with the aim to produce nil detriment to the junction’s capacity performance when compared to the Reference Case scenario*”.
- 26 We note that, for the Stage 3 modelling, the impacts on the roundabouts at the above junctions have been reappraised using the proposed high mode shift scenario. The strategic modelling demonstrates that at both locations in Tables 9 and 19 respectively the junctions will still be operating over capacity on some approaches on both the local and strategic road networks.
- 27 Detailed junction modelling has been undertaken at both junctions; this is reported in separate sections of the technical note and discussed below.

Junctions 21 and 22: A21 / A228 Pembury Road / Tesco

- 28 For the A228 dumbbell roundabouts, with the high mode shift scenario in 2038 the A21 approaches to the roundabouts do not appear to have capacity issues although the A264, A228 and Tesco approaches are seen to operate close to or over capacity with the situation worsening with the Local Plan mode Shift scenario compared to the Reference case.
- 29 **We note specifically that KCC has questioned the validation of the base case for both roundabouts on the basis of evidence of existing congestion from Google maps. We have identified the same potential issue and will also therefore need to review the specific evidence relating to the base validation of these models – this should either be supplied directly, or the location of the evidence in existing documents should be confirmed.**
- 30 The text states for the south west dumbbell that the main constituent of future delay is background traffic growth and that the highway authority (presumably Kent County Council) should address the capacity issues. **We note that KCC have raised specific concerns over these approaches and are requesting mitigation; we will also need to review these proposals and any impact on delays or queuing affecting the SRN.**
- 31 At the north east dumbbell the additional delay to the Tesco exit approach is not considered material. However, the adjacent signalised junction with Tonbridge Road and High Street is known to be congested and previous planning applications have proposed alterations to this junction accordingly. **Evidence will need to be provided that the performance of this junction will not impede the northeast dumbbell in order for this conclusion to be verified.**
- 32 **Detailed junction model outputs will need be provided to enable proper scrutiny of the roundabout geometry; these should be accompanied by a corresponding geometry drawing showing the relevant measurements for both the existing and any future proposed mitigation schemes (including any developed in response to the KCC comments).**

Junction 31: A21 Kippings Cross

- 33 At the A21 Kippings Cross roundabout, the strategic modelling is similarly showing that the B2160 and A21 eastern approaches will be operating over capacity in the 2038 morning peak hour in both Reference Case and Local Plan Mode Shift scenarios. Detailed junction modelling has been undertaken that replicates this outcome but with additional capacity issues for the A21 western approach during the evening peak hour. For both the eastern and western A21 approaches, the increases in delay with the Local Plan are sufficient to require mitigation as recognised in the text. **Full junction model outputs should be supplied to enable proper scrutiny of the detailed junction modelling undertaken, along with geometry measurement drawings to allow the parameters used within the models to be reviewed.**
- 34 The interaction between the Kippings Cross junction and the adjacent Blue Boys junction is considered to be significant and issues at one of the junctions have been observed to quickly lead to knock-on effects at the other. **As has been stated in the KCC response, the impact of delays and queueing at the Blue Boys junction needs to be fully explained within the technical note.**
- 35 The text outlines potential mitigations that have been considered at Kippings Cross and shortlists two favoured options, namely a left turn jet lane from the western A21 approach to the B2160 and a signalised roundabout increasing the circulatory area to allow queueing. Further junction modelling has been undertaken with results provided. **Full model outputs for these exercises are required to establish that the modelling is sufficiently robust and that the proposed mitigations are likely to accommodate the additional traffic.**

- 36 Subject to the provision of this additional information, we agree in principle that the favoured options identified in the technical note should be investigated further. However, both options are noted to require third party land, to have significant costs associated with them, and to leave a number of issues relating to congestion in place (we have noted the specific points raised by KCC and additionally note that the impacts to the local road network would remain significant; changes to address this risk reducing the benefits to the SRN and we would need to be satisfied that the scheme(s) would still offer appropriate mitigation of SRN impacts.** Assuming that a scheme which is acceptable in principle to both KCC and National Highways can be found, additional information will be required as described below, before any formal agreement can be reached on the suitability of these proposals as mitigation for the Local Plan impacts.

Further Comments on Proposed Mitigation Measures

- 37** For any physical mitigation on the strategic road network, National Highways will need (as a minimum) to be confident that the proposals conform to DMRB design standards and that there are no safety “showstoppers” that would prevent the mitigation designs from being implemented. **We will therefore require a suitable general arrangement drawing to be produced for all mitigation proposals; this will need to be accompanied by a schedule identifying any required departures from applicable DMRB standards, and the justification for these.**
- 38** **We will additionally require an audit brief for a Stage 1 Road Safety Audit (RSA) to be developed and agreed with us before the audit is conducted. The auditors must be suitably qualified to carry out audits relating to the SRN and the completed audit will need to be reviewed and signed off, followed by preparation of a Designers’ Response once we have confirmed that the audit report is acceptable.**
- 39** **Any mitigation costs will need to be funded through the Local Plan (with full details of proposed funding mechanisms included in the associated Infrastructure Deliver Plan (IDP) and remain the responsibility of the planning authority.**

Conclusion

- 40** In summary, the submitted technical note provides some further additional detail and explanation around the expected impacts of Local Plan traffic under the “high modal shift” scenario. We note that actions remain outstanding from our previous response, and in particular we require the additional evidence required to support the sustainable transport strategy and its impacts on SRN traffic to be provided, before we can fully accept the conclusions drawn from the modelling exercises.
- 41** As has been previously stated, our suggested methodology is intended to ensure that the resulting calculation of “residual trips” is consistent with the requirements of Circular 01/22 and in particular the practical application of a “Vision and Validate” approach to the overall transport mitigation process. Given the comments provided by KCC and their requests for a “worst case” to be considered, we would re-iterate the importance of this additional work being undertaken.
- 42** We note that KCC have expressed significant concerns with the operation of the local highway network in vicinity of the two SRN junctions examined in detail in the supplied technical note. Any amendments to the modelling or mitigation proposals (including the development of new mitigation options) must continue to demonstrate that impacts to the SRN will remain acceptable.
- 43** Significant further work will be required to develop any “in principle” mitigation schemes to a level where they are acceptable to National Highways as suitable mitigation for the Local Plan proposals.