



## Growth and Communities

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**BY EMAIL ONLY**

23 October 2024

Dear Sir / Madam,

### **Re: Public Consultation on New Evidence Base Documents – Tunbridge Wells Borough Council Local Plan**

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the public consultation on new Evidence Base Documents to support the preparation of the Tunbridge Wells Borough Council Local Plan.

The County Council has reviewed the consultation documents and has provided commentary below.

### **PS 093 Tunbridge Wells Gypsy, Traveller, and Travelling Show People Accommodation Needs Assessment (GTAA) 2024-2039, Final Report June 2024 (version 2)**

#### **Development Investment**

The County Council would request clarity as to whether there will be an expectation on permanent, allocated Gypsy and Traveller sites to be subject to S106 planning obligations for development to ensure necessary county infrastructure such as education, adult social care, libraries, integrated children's services, waste, community learning and skills is supported accordingly.

## **PS 095 Policy STR/SS1 – the Strategy for Paddock Wood including Land at East Capel**

### **Highways and Transportation**

It is recommended that reference to the Monitor and Manage strategy should be included in the policy wording to emphasise its role in informing if, and when, the delivery of the infrastructure is needed.

Reference is made to financial contributions for the delivery of highway related infrastructure. It should be noted where schemes have been identified as being required to mitigate the impact of a development site, unless otherwise agreed by the County Council, as Local Highway Authority, they will be progressed solely via the County Council's Developer Agreements process of technical approval and oversight. The County Council will not accept financial contributions to schemes agreed unilaterally between a developer and a local planning authority.

Paragraph 15 of Policy STR/SS1 states: 'The infrastructure to be funded shall include but not be limited to' then follows a list of infrastructure. The County Council suggests that reference is made, within this paragraph, to the need for the list of infrastructure to be agreed with the relevant authority. This section should also include the requirement for new and improved bus services, improvements to Summerhill Roundabout, the Hop Farm roundabout and the A264 Pembury Road corridor improvements.

The requirement for improvements to the Badsell Roundabout (A228/B2017), the Local Cycling and Walking Improvement Plan (LCWIP) relating to Paddock Wood and surrounding area, the Paddock Wood Town bus service and new inter-urban bus service between Paddock Wood and Royal Tunbridge Wells, should all be included in the infrastructure listed.

Reference to the proposed shuttle working by means of new traffic signals at the railway bridge on the B2016 Maidstone Road should be removed as this is not supported by the County Council, as Local Highway Authority.

The Monitor and Manage strategy should include (but not be limited to) the following junctions:

- Junction 13 A228/2016 Maidstone Road
- Junction 14 A228/Alders Road/Crittenden Road
- Junction 13 A228/Maidstone Road
- Junction 72 A267/B2169 Birling Road
- Junction 88 B2017/Hartlake Road
- Junction 107 Matfield Crossroads

The Monitor and Manage strategy will underpin the Infrastructure Delivery Plan and ensure transport infrastructure delivery is appropriate in terms of form, scale and timing. The list of schemes needs to be flexible as changes to travel habits, the success of sustainable travel interventions and future detailed transport evidence may lead to changing

requirements/focus for mitigation and result in sites being removed and others being included.

### Public Rights of Way (PRoW)

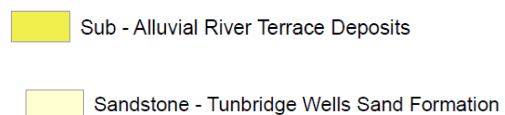
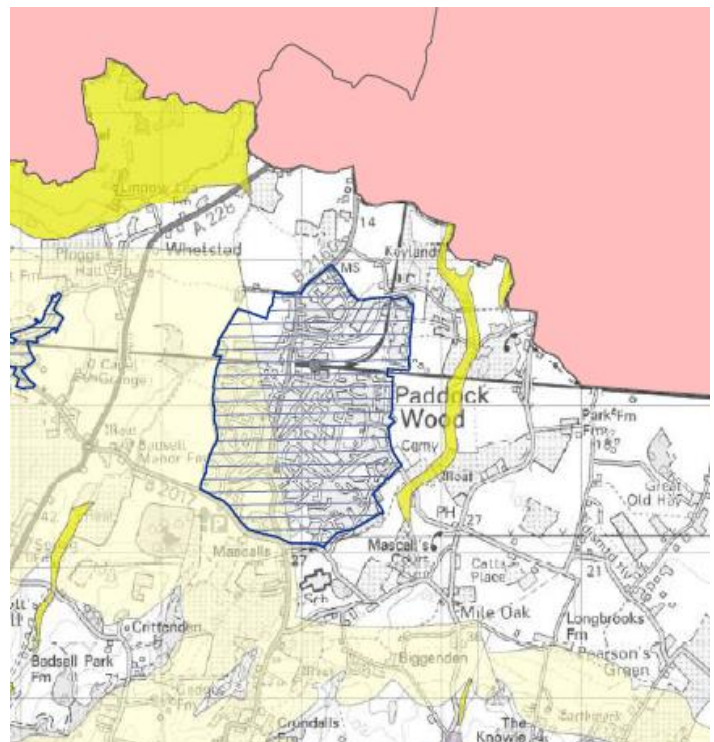
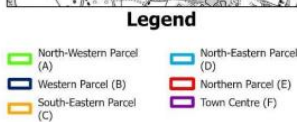
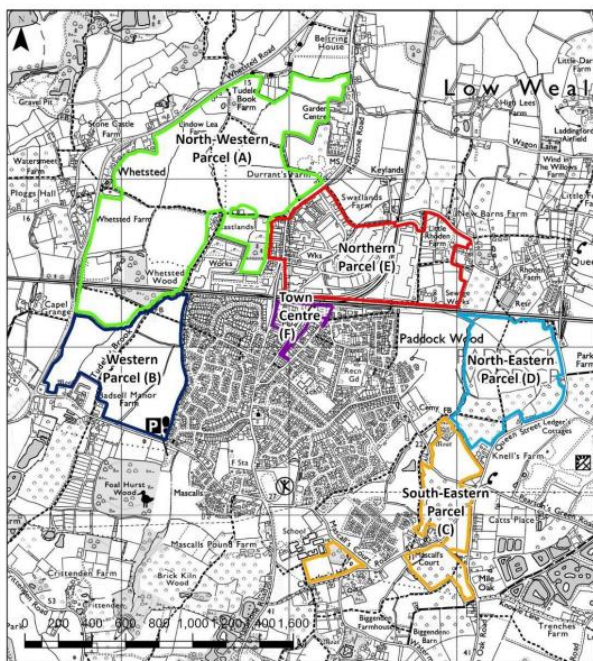
The County Council, as the Local Highway Authority, would request that whenever “walking and cycling links” are mentioned, that specific mention of the PRoW Network is also made. There is specific reference included regarding connecting to the wider network of “Footpaths and Bridleways”; this would be more accurate/correct if termed the Public Rights of Way Network.

### Minerals and Waste

The County Council, as Minerals and Waste Planning Authority, notes previous commentary raised in respect of safeguarded land won mineral issues in Capel and Paddock Wood. It is assumed that the land parcels A, D and C of Policy STR/SS 1 constitute areas for development allocation (that are coincident with the two safeguarded land won minerals, see extracts below) are a reduction in overall size since the submission of the Local Plan.

#### Policy STR/SS 1

#### The Strategy for Paddock Wood including Land at east Capel



The County Council, as Mineral Planning Authority, has previously commented on the mineral safeguarding matters that affect the safeguarded mineral interests in the Paddock Wood and Capel area and draws attention to the previous comments. In particular, Policy

SRT/SS 1 affects safeguarded minerals. The TWBC Local Plan should therefore refer to these safeguarded minerals and ensure that it references how an exemption from the presumption to safeguard these deposits in accordance with Policy DM 7 of the Kent Minerals and Waste Local Plan 2013-30 (Early Partial Review 2020) is justified. From the information currently available, the County Council considers that a viable case for the prior extraction of the minerals is likely to be low.

## **Heritage Conservation**

The County Council notes that the Strategy for Paddock Wood including Land at East Capel provides a framework for provision of an extended settlement over the plan period providing approximately 2450 dwellings and associated infra structure with development parcels. The County Council considers that there is insufficient mention of the historic environment within this document.

Point 3 on page 4 sets out proposed strategic development principles. The County Council welcomes the statement (c) which relates to a landscape led and a high standard of design. The County Council would ask that this should include the retention and enhancement of hedges and trees along the A228 with development set back from the road to reduce visual impact on the countryside, with use of internal hedging and tree belts along field boundaries to influence development layout. This should be expanded to incorporate the use of landscaping to protect the setting of heritage assets, in particular isolated farmsteads and rural structures.

Furthermore, the County Council welcomes Point 3 clause (d) which relates to local character and overall setting but asks that this is expanded to ensure that development embraces the special and particular character of the area, the local buildings, topography and landscape features, to ensure that any development increases the place value and identity of the Paddock Wood settlement and heritage of the community, rather than a generic layout.

The County Council would ask that additionally within Point 3, or as part of statement d) that the proposed development should respond appropriately to the Kent Historic Environment (HER) data, with aims to conserve and enhance the historic environment where possible; and to utilise heritage to deliver new development which is sympathetic to and reflects local historic character.

In respect of Point 5, the County Council would welcome the statement that planning applications should be informed by heritage studies but would like to add that these heritage studies should include Kent HER data, archaeological landscape assessments and built heritage assessments. Planning applications must be supported by evidence-based assessments to establish the nature and significance of heritage assets within the affected area, including detailed historic characterisation work and visual impact assessments, considering the potential impact upon the setting of important heritage assets.

In respect of Point 8 regarding Master-planning, the County Council welcomes the proposal that each masterplan shall (b) refer to heritage assets and their settings but would like to add that the masterplan for each parcel (or combination of parcels) should include an

archaeological landscape assessment. This is to ensure that there is still consideration of landscape features which may not necessarily be highlighted in the Landscape Visual Impact Assessment (LVIA) but which are of archaeological importance, for example, biodiversity-poor hedgerows or partially filled ditches which are part of an ancient field system or routeways. It is recommended that in addition the masterplan should demonstrate how it will deliver the conservation and enhancement of the historic environment.

The County Council welcomes Point 8(j), which ensures where Green Belt is to be developed, that the development provides compensatory improvements to the Green Belt. However, it is asked that this requirement be enhanced to require details of specific proposals and to demonstrate the cumulative impact of any loss or enhancement of the Green Belt, with specific reference to the historic environment and settlement separation and identity.

*Specific comments on Land Parcels:*

Policy STR/SS 1(A) - North-Western Parcel Requirements – (vi) The County Council would ask that for the creation of a Wetland Park, the requirements need to include an archaeological assessment including geo-archaeological assessment, and in addition to the ecological enhancement measures there should be consideration of geo-archaeological and early prehistoric interpretation to raise understanding, awareness and enjoyment of the archaeological importance of the river environment.

Policy STR/SS 1(B) – South-Western Parcel Requirements – It is asked that this includes special consideration of measures to respect, protect and enhance the heritage asset of Badsell Moated Manor and mill complex, including its setting and associated archaeological landscape.

Policy STR/SS 1(C) – South-Eastern Parcel Requirements – The County Council would ask that this includes special measures to protect and enhance the awareness, understanding and enjoyment of the stream which is a key part of the significance of several Post Medieval or earlier complexes including Mascall’s Court and Moat Plats.

Policy STR/SS 1(D) – North-Eastern Parcel Requirements – Point (iii) regarding the Hop Pickers Trail, is welcomed but it is asked whether this can be emphasised that this “trail” needs to reflect the Hop Pickers railway line as an industrial/horticultural heritage asset, as well as a natural environment asset.

**PS 097a Statement of Common Ground between Tunbridge Wells Borough Council and Kent County Council Education (August 2024)**

**Development and Investment**

Within paragraph 1.4 (page 3), the terminology “PAN” needs to be clarified to ensure understanding.

**PS 098 Action Note on Action Point 28 - Local Plan Sequential Test regarding Strategic Allocation Policy STR SS1 Land at Paddock Wood including land at east Capel (September 2024)**

**Sustainable Urban Drainage Systems (SuDS)**

The County Council, as Lead Local Flood Authority, has reviewed the Local Plan Examination Note for Inspector in response to Action Point 28 regarding the STR/SS1 Land at Paddock Wood and east Capel Sequential Test and raises the following comments.

The County Council is pleased to note that "*The Council considers that the above approach to housing delivery at Paddock Wood and land at east Capel results in the passing of the Sequential Test. Now that all of the land available for housing is within Flood Zone 1, it is not necessary for the exception test to be applied.*" as stated in paragraph 3.31. However, given that it is the County Council's understanding that the sequential/exception test is required to consider all risks of flooding, the County Council would expect for a similar statement to have been provided with regard to surface water flood risk which does not constitute Flood Zones 2 or 3.

Given that by its nature surface water may not cover the entirety of any proposed development sites. Therefore, the County Council would request a reference of the application for the requirement of the sequential approach to development layout should any proposed sites have surface water flow paths present (as per some of the proposed residential areas within Capel) to have been made.

**PS 099 Introductory Note to Highways Modelling Reports**

**Highways and Transportation**

The County Council acknowledges the purpose of this note is to set out a list of highways related reports produced to support the new Local Plan. Comments relating to those documents included below.

**PS 100 Modal Shift Analysis (Vs2) 9th April 2024**

**Highways and Transportation**

The report summarises the Modal Shift evidence previously provided.

The vision for high modal shift, as required by national policy, and the infrastructure and measures proposed to achieve this are supported by the County Council, as Local Highway Authority. The Bus Strategy identifies new and improved services supported by associated infrastructure within Paddock Wood including a new loop service, and an enhanced inter-urban service between Paddock Wood, Pembury and Royal Tunbridge Wells. The existing rail service provides an important link between the growth area of Paddock Wood to

Tonbridge and further onward destinations. Delivery of the LCWIP is proposed to provide enhancements to walking and cycling infrastructure across the borough.

It is accepted that these provide enhanced journey options for the key development sites in the Local Plan and that the approach is in line with DfT Circular 01/2022 and the National Planning Policy Framework (NPPF). Additional confidence in the success of the sustainable transport interventions is provided through the development of a Monitor and Manage strategy and the requirement for travel plans.

It should be noted that in accordance with DfT Circular 01/2022, TWBC developed three demand scenarios; low, medium and high modal shift as set out in Section 7 of PS\_100 Modal Shift Analysis. The new Local Plan strategy has been modelled for both the low modal shift scenario and for a high modal shift scenario and major hotspots for each scenario are reported in PS\_049 Stage 3 Modal Shift Impact Reporting TW Local Plan Stage 3 areas of interest. In the high modal shift scenario only one hotspot is removed from the list of 'major hotspots' when compared to the low modal shift scenario. This is the junction of A228/A264/A21 and this junction is included within the A264 Pembury Road Corridor – Junction Capacity Assessment with mitigation proposed.

### **PS 101 A264 Pembury Road Corridor – Junction Capacity Assessment 28th June 2024**

#### **Highways and Transportation**

The County Council, as Local Highway Authority, was engaged by TWBC in the development of the alternative mitigation strategy and reviewed this Technical Note prior to the 2024 Hearing Sessions and found it acceptable subject to the following: the schemes presented in the Technical Note are high level designs appropriate for the Local Plan examination stage and subject to the County Council's Technical Approval Process (TAP), safety audit, costings and checks for statutory undertakers' equipment. Please also see comments relating to PS\_104 Strategic Transport Assessment Addendum below.

### **PS 102 Junction Hotspot Comparison 17th June 2024**

#### **Highways and Transportation**

The Junction Hotspot Comparison is useful to compare the hotspots identified in the transport evidence supporting the Submitted Local Plan with the hotspots identified in the transport evidence supporting the Revised Local Plan. Mitigating measures are included in the Infrastructure Delivery Plan (IDP) for the key major hotspots and the County Council has recommended in comments relating to the revised wording for PS\_095 Policy STR/SS1 and relating to the IDP (PS\_105) that those junctions/links identified as hotspots but not included for mitigation in the IDP are included in the Monitor and Manage strategy. It should be noted that the Monitor and Manage strategy is not limited to those junctions/links, additional junctions/links may be included at a later date as transport evidence is refined to incorporate changes that occur on the highway network.

## **PS 103 Strategic Transport Assessment Modelling Appraisal April 2024**

### **Highways and Transportation**

The County Council, as Local Highway Authority, was previously consulted on the Strategic Transport Assessment (STA) prior to the 2024 Hearing sessions. Comments were provided to TWBC dated 23 May 2024. Following these comments additional work was prepared by TWBC and some of the matters raised by the County Council have been addressed.

Whilst highway mitigations are proposed or being developed for the majority of junctions identified as 'major hotspots', there are a number of junctions identified as hotspots where mitigation is not proposed at this stage. The County Council has recommended that these junctions be included in the Monitor and Manage Strategy, however, reference is not included in the Infrastructure Delivery Plan, the Viability Assessment or Policy STR/SS1.

These junctions are listed below:

#### *Junction 14: A228 / Alders Road / Crittenden Road*

This junction will be reconfigured as part of the Colts Hill Bypass scheme, and this will effectively mitigate the junction. The junction has not been identified as a collision hotspot in the recent study prepared by Sweco and included at Section 5.13 of the April 2024 STA, however, there will be an increase in traffic movements along the A228 prior to the delivery of the bypass and so it is recommended that the junction is included in the Monitor and Manage Strategy with a view to monitoring the crash record in the time leading up to the delivery of the Colts Hill bypass.

#### *Junction 13 A228/ Maidstone Road*

The junction was identified in the Strategic Transport Assessment as a 'major hotspot' and so additional modelling was undertaken in the A264 Corridor Assessment (PS\_101). The capacity assessment concluded that the junction would work within capacity for all demand scenarios and so no mitigation is needed. However, as the junction has also been identified as a collision hotspot in the Strategic Transport Assessment Addendum and is expected to experience significant increases in traffic flows, the County Council recommends it is included in the Monitor and Manage Strategy in terms of safety.

#### *Junction 107 Matfield Crossroads*

The County Council will work with TWBC to identify traffic management measures and signage measures which can help to discourage the potential for rat running on rural roads. This junction should also be included in the Monitor and Manage Strategy.

#### *Junction 72 A267/B2169 Birling Road and Junction 88: B2017/ Hartlake Road*

The junctions are included in the Infrastructure Delivery Plan and the Viability Assessment but not referred to in the revised policy working for STR/SS1. Further detail is required of the capacity results for review and the proposed mitigation. It is recommended that mitigation for



these junctions is included in the Local Plan Strategy and brought forward if identified as necessary in the Monitor and Manage Strategy which is currently being developed. The Monitor and Manage Strategy should also review the crash record at these junctions.

### *B2017 Five Oak Green*

The County Council raised concerns that link capacity along the B2017 is shown to be at full capacity in the Local Plan Modal Shift (LPMS) scenario with a volume/capacity (v/c) value of 100 in the AM peak compared to a v/c value of 68 in the RC. Clearly the local plan development strategy has a significant impact even with the high modal shift. The B2017 is included in the latest version of the Infrastructure Delivery Plan and the Viability Assessment and should also be included in Policy STR/SS1 and the Monitor and Manage Strategy to review capacity and safety as traffic flows increase along the route.

The STA includes a review of personal injury crashes over a 3-year period for sites where the Local Plan Strategy leads to an increase of 50 or more vehicles in the morning and evening peak periods. It is recommended that the findings of this study should be explored further with the County Council Highway Improvements team.

## **PS 101 A264 Pembury Road Corridor – Junction Capacity Assessment and PS 104 Strategic Transport Assessment Addendum June 2024**

### **Highways and Transportation**

The Strategic Transport Assessment Addendum (STAA) follows the Strategic Transport Assessment (STA) and A264 Pembury Road Corridor – Junction Capacity Assessment.

The STAA reports on the modelling of the LPHM2 scenario (Local Plan Highway Mitigation Option 2). The STA identifies 2 options for the mitigation of the Local Plan impact at the junction of the A21/B2016 Kippings Cross. Option 2 included highway mitigations for the following:

Sustainable Transport Interventions comprising of:

- Paddock Wood bus service, Inter-urban bus service upgrade and LCWIP measures
- Colts Hill Bypass
- Badsell Roundabout Improvements
- Summerhill Roundabout Improvements
- Hop Farm Roundabout Improvements
- Pembury Road Capacity Improvements comprising:
  - A228 Pembury Road / Tonbridge Road (Woodgate Corner)
  - A228 Pembury Road A21 flyover Southwest Dumbbell
  - A264 Pembury Road / Hall's Hole Road
  - A264 Pembury Road / Sandhurst Road

The A264 Pembury Road Corridor Assessment identifies junction capacity improvements to increase capacity along the A264 corridor and the STAA models the impact of the re-routing

of traffic to an upgraded A264 Pembury Road corridor, from the B2016 to/from Kippings Cross.

The County Council, as Local Highway Authority, is broadly in agreement with the conclusions of the STAA subject to the following:

Reference to the following junctions in Policy STR/SS1 for inclusion in the Monitor and Manage Strategy as already outlined in the comments relating to the STA above:

- Junction 13: A228 / Maidstone Road
- Junction 14: A228 / Alders Road / Crittenden Road
- Junction 72: A267 / B2169 Birling Road
- Junction 88: B2017 / Hartlake Road
- Junction 107: Matfield Crossroads
- B2017 Five Oak Green

### **PS 105 TWBC Infrastructure Delivery Plan dated August 2024**

#### **Highways and Transportation**

TWBC has updated the IDP to reflect the infrastructure requirements to support the new Local Plan. The highway infrastructure requirements are evidenced in the documents listed in PS\_099 Introductory Note to Highways Modelling Reports.

The County Council, as Local Highway Authority, has reviewed the August 2024 IDP and comments are provided using the same paragraph numbers as the IDP for ease of reference as follows:

Paragraph 1.3 - It is stated that the IDP should be read in conjunction with Paddock Wood Infrastructure Framework 2024. However, this document is not included in the current consultation documents and does not appear to be listed with the other Local Plan related documents on the TWBC website. Please provide a copy or a link to this document.

Paragraph 1.4 - It is stated that Appendix 2 includes the Paddock Wood Special Delivery Strategy, however, this is not the case as Appendix 2 of the IDP is the 'existing open space by parish (as identified within the Open Space Study 2018)'. It would be helpful if the Paddock Wood Special Delivery Strategy could be forwarded for review and included in the IDP.

Paragraph 2.12 - The overall Development Strategy is set out in the proposed amended Policy STR1 – 'The Development Strategy'. The County Council has no comments relating to this document.

Paragraph 2.14 – The paragraph sets out what is included within Section 4 of the Local Plan. The inclusion of the Vision and Validate and Monitor and Manage approach as defined by DfT Circular 01/2022 should be considered. Also to be included is the requirement for scheme delivery to be developer led by means of a S278 Agreement with a consortium of

developers responsible for delivery where multiple developments need the mitigation schemes. The County Council, as Local Highway Authority, will assist and oversee the delivery of schemes via the Section 278 Approval process but will not act as the delivery body of the schemes.

Paragraph 2.17 - Policy STR6 – Transport and Parking covers ‘Key transport infrastructure and the priorities for sustainable transport modes.’ This policy should be updated to reflect the mitigation requirements for the new Local Plan.

Paragraphs 3.3 – 3.10 The County Council is supportive of the Vision and Validate and Monitor and Manage approach to infrastructure delivery. This is a strategy identified in DfT Circular 01/2022 and the principles can be applied to the local road network. The policy approach is required to plan for effective future network operation and the evaluation of the proposed growth and identification of appropriate mitigation across all modes.

Paragraph 3.18 - It is stated that ‘there is a poor accident record on the A228 at Colts Hill’; this is no longer the case and evidence was reported to the recent Local Plan hearings to this effect. The STA includes a review of the crash record over the study area and the A228 at Colts Hill has not been identified as a crash hotspot.

It is also reported that the A268/A229 crossroads in Hawkhurst suffers severe congestion at peak times, however, the junction is planned to be improved. Additionally, the junction has not been identified as a ‘hotspot’ in the Sweco Transport Assessment or TA

Paragraph 3.21 - This covers the mitigation schemes identified to support the growth in the Revised Local Plan. Please add that ‘Schemes may be varied subject to agreement with the Local Highway Authority’.

The list of schemes should be updated to reflect those identified in the latest transport evidence relating to the new Local Plan. Currently the list of schemes includes the mitigation relevant to the submitted Local Plan.

Reference is made again to the ‘Paddock Wood Infrastructure Framework 2024’. The County Council requests this is forwarded for review.

Paragraph 3.47 - Rail infrastructure improvements have not been identified, however, Policy STR6 includes the following statement: ‘Working with Network Rail and the train operating company to provide station infrastructure improvements where necessary and working strategically to retain and improve the rail network by increasing the attractiveness of travelling by rail, including to multiple destinations.’

Enhancements to Paddock Wood Station to provide cycle storage, pedestrian improvements and bus facilities could be explored further as these would be helpful in delivering the high modal shift vision.

Paragraph 3.63 - The proposed bus improvements listed should be updated to reflect the latest evidence provided to support the Revised Local Plan and in particular the WSP bus studies.

Appendix 1: Infrastructure Delivery Schedule. - This should be updated to reflect the mitigation identified in the latest evidence provided to support the Revised Local Plan as the list currently includes mitigation relevant to the submitted Local Plan.

The locations listed below should be included in the Monitor and Manage strategy and the IDP.

- Junction 13 A228/2016 Maidstone Road
- Junction 14 A228/Alders Road/Crittenden Road
- Junction 13 A228/Maidstone Road
- Junction 72 A267/B2169 Birling Road
- Junction 88 B2017/Hartlake Road
- Junction 107 Matfield Crossroads

It should be noted that the Monitor and Manage strategy will underpin the Infrastructure Delivery Plan and ensure transport infrastructure delivery is appropriate in terms of form, scale and timing. There is a need therefore for the list of schemes to be flexible and responsive to changes to travel patterns. The success of sustainable travel interventions and future detailed transport evidence may lead to sites dropping out of the list and others being included in the list for mitigation.

The IDP includes £1,725,000 for a 'new bus route subsidy (five years)'. This amount does not tally with the total amount of subsidy needed as identified in the WSP bus studies prepared for TWBC to support the Revised Local Plan, namely PS\_040 Public Transport Feasibility Study Review and PS\_041 Paddock Wood Bus Service Options. The IDP should be updated to cover the costs of the intended service improvements.

The delivery body should be amended to reflect the latest position of the County Council in that:

- Unless schemes are small scale and with standard costs/ low risk of cost increase (this will be determined by the County Council) / or where a County Council 'in house' design and costing estimate has been used (funded externally), they will be progressed solely via the County Council's Developer Agreements process including technical approval of designs and oversight.
- The County Council will provide technical support to district councils where schemes are identified as part of the Local Plan process, ideally through a scheme board with the associated developers forming a delivery consortium.
- Where schemes have been identified through the Local Plan process and where third party land may be required, the County Council will assist the district council in the promotion of any Compulsory Purchase Orders (and potential Side Roads Orders) that are likely to be needed.
- Where schemes have been identified as being required to mitigate the impact of a number of development sites which are coming forward in a similar time frame in

advance of the local plan process, the County Council's position will be that the developers will deliver the scheme via a delivery consortium or a lead developer.

- Where schemes have been identified as being required to mitigate the impact of a development site, unless otherwise agreed by the County Council, as Local Highway Authority, they will be progressed solely via the County Council's Agreements process of technical approval and oversight. The County Council will not accept contributions to schemes agreed unilaterally between a developer and a local planning authority.

It is recommended that the IDP is updated to address the comments provided above and to reflect the latest evidence produced to support the new Local Plan, including interventions identified within the mitigation scenario LPMSH2, the sites for inclusion in the Monitor and Manage strategy and removal of superseded or obsolete schemes as a result of the change in development strategy. It would be useful to include a spreadsheet or table to clearly show when delivery of the mitigation is currently predicted to be needed in relation to the housing trajectory (PS\_062 Updated Local Plan Housing Trajectory), employment trajectory, costs and delivery body. This can be used for the Monitor and Manage framework and adjusted to reflect future changes to the trajectory and information from the traffic monitoring exercise.

### **Development Investment**

The County Council is concerned that there is no mention in this document under Theme 2 (Education page 46), or indeed anywhere in the document, regarding SEND (Special Education Needs and Disabilities), even if it is to say that there is already sufficient need for the plan period. This should be corrected.

In respect of 'Prioritisation of infrastructure' (page 13 of 185), the County Council questions whether the order of the Themes listed under 3.0 (page 19) is an order of priority and therefore related to this prioritisation narrative on page 13. If so, the County Council requests this is made clearer and better linked.

### **PS 106 Update to Viability Appraisal following completion of the Final IDP (August 2024)**

#### **Highways and Transportation**

The Addendum Update to the Local Plan Viability Assessment Addendum reflects the updated infrastructure information which is summarised in Appendix I Table 1B. Comments relating to Appendix I Table 1B are provided below.

## **PS 106b Appendix I**

### *Table 1 Development Cost Assumptions (August 2024)*

Contingency build costs are listed with 3% re housing and 5% for other costs – 5% is not sufficient contingency for build costs of highway works. The County Council would expect 30% contingencies to be included.

### *Table 1A Infrastructure Timings (August 2024)*

The Viability Assessment includes highway schemes with only 63% of the cost listed. The County Council requests clarity why only 63% of the costs is listed and how the remaining 37% is to be funded (extract below).

As with the IDP, the Viability Assessment includes £1,725,000 for a 'new bus route subsidy (five years)'. This amount does not tally with the total amount of subsidy needed as identified in the WSP bus studies prepared for TWBC to support the Revised Local Plan, namely PS\_040 Public Transport Feasibility Study Review and PS\_041 Paddock Wood Bus Service Options. The Viability Assessment should be updated to cover the costs of the intended service improvements.

Table 1A includes 'Shuttle signal Bridge Paddock Wood High Street'. The signalisation and shuttle working over the railway bridge on the B2160 Maidstone Road, Paddock Wood is not supported by the County Council.

Significant upgrades are included for Putlands Sports and Leisure Centre and this is an opportunity for land to be provided by Putlands to facilitate a cycleway along Mascalls Court Road.

## **PS 109 Revised wording for Policy STR1 – The Development Strategy**

### **PRoW**

The County Council, as Local Highway Authority, is supportive of the multiple references to modal shift/off road connectivity etc and would suggest that to the PRoW Network is also specifically referenced in this strategy. It is noted that the Development Strategy is very cycle-focused and that there is little in regard to pedestrian routes in terms of modal shift. It is asked that this be addressed.

## **Conclusion on Consultation**

### **Highways and Transportation**

The County Council is grateful for the extensive amount of work completed to assess the transport impacts of the new Local Plan and is broadly in agreement with the results and conclusion set out in the transport evidence. As outlined above there are some amendments

and additions required which will provide greater clarity and confidence in the delivery of the right infrastructure at the right time. This includes, but is not limited to, the inclusion of the Vision and Validate and Monitor and Manage approach in the relevant Policy, amendments to the Infrastructure Delivery Plan to reflect the revised infrastructure requirements including a table to clarify the infrastructure required, date for delivery, delivery body, costs and how these fits with the housing and employment trajectories. The queries relating to the Viability Assessment need clarification and the costs for the proposed inter-urban bus service and Paddock Wood Bus Service should be checked against the evidence and the amounts updated as necessary.

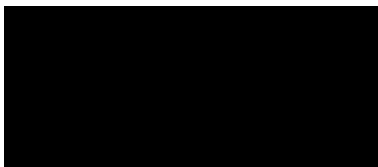
The County Council, as Local Highway Authority, wishes to be clear that where schemes have been identified as being required to mitigate the impact of a development site, unless otherwise agreed by the County Council, they will be progressed solely via the County Council's Developer Agreements process including technical approval of designs and oversight. The County Council will not accept contributions to schemes agreed unilaterally between a developer and a local planning authority but will support and assist TWBC throughout the delivery process.

The County Council hopes this information is useful and the County Council welcomes the opportunity to work with TWBC to address the comments above and to assist in progressing the transport related matters to support its new Local Plan.

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The County Council would welcome continued engagement as the Local Plan process progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,



**Stephanie Holt-Castle**  
Director – Growth and Communities