

Position Statement

Between

Tunbridge Wells Borough Council

And

National Highways

In respect of

Tunbridge Wells Borough Local Plan

November 2024



Contents

1.0 Introduction 1

2.0 Overview of Inspectors Initial Findings.....2

3.0 The response to the Initial Findings in respect of highways3

4.0 Future working6

5.0 Signatories6

1.0 Introduction

- 1.1 This Position Statement is a jointly agreed statement between National Highways (NH) and Tunbridge Wells Borough Council (TWBC), hereafter referred to as “the parties”, in relation to the examination of the Tunbridge Wells Borough Local Plan (TWLP). NH is responsible for the safety, reliability and operational efficiency of the Strategic Road Network (SRN) including the trunk motorways (“motorways”) and all-purpose trunk roads (APTRs) in England. In the case of Tunbridge Wells, NH is concerned about the impacts on the A21.
- 1.2 It takes account of the continued development of the TWLP following the receipt of the Inspector’s Initial Findings in November 2022 and the work undertaken by TWBC in association with NH (and Kent County Council Highways) to resolve matters of soundness that were raised.
- 1.3 The TWLP was submitted for examination in November 2021, with Stage 1 and 2 Hearings taking place between March and July 2022. The submission was supported by a signed Statement of Common Ground between the parties dated 11 July 2022 [[CD Reference PS_032](#)] which sets out the agreed work undertaken up to the submission of the TWLP.
- 1.4 This Position Statement relates solely to the work undertaken by consultants on behalf of TWBC in discussions with NH on the Council’s response to the Inspector’s Initial Findings and does not duplicate settled matters that have been agreed in the earlier SOCG between the parties on unchanged matters in the TWBC Submission Local Plan, referenced at para 1.3 above

2.0 Overview of the Inspector's Initial Findings

- 2.1 Following Examination hearing sessions during March - July 2022, the Inspector wrote to the Council in November 2022 setting out his [“Initial findings”](#) on the Submission Local Plan (SLP).
- 2.2 The principal issues that bear upon the Local Plan's overall development strategy relative to highways matters related to:
- the need for further consideration to be given to a range of issues in relation to the proposal for a new settlement at Tudeley Village (SLP allocation STR/SS 3), and to alternative ways forward, as posited by the Inspector (Inspector's letter paragraphs 9 – 38);
 - the need to give further consideration to an option for strategic growth at Paddock Wood and land in east Capel that does not involve building on land within higher risk flood zones (Inspector's letter paragraphs 39 – 52).
- 2.3 The Council set out in detail the matters pertinent to the Inspector's Findings and the consequential impacts upon the Local Plan within the [Development Strategy Topic Paper Addendum](#) (January 2024). This was informed by a range of evidence, including updated transport evidence which NH was engaged with during preparation. This was presented to members, who formally agreed to accept the recommended future strategy to propose to delete the allocation for Tudeley Village and adopt an alternative growth strategy for Paddock Wood.

3.0 The response to the Initial Findings in respect of highways

3.1 The following documents form the additional work (following the Initial Findings letter) carried out by the Council and which has been proactively discussed and agreed between the parties: -

- TW Stage 1 Technical Note - Review of Strategic Modelling ([PS_047](#)) (August 2023)
- TW Local Plan Stage 2 - Reporting ([PS_048](#)) (August 2023)
- TW Local Plan Stage 3 - Modal Shift Impact Reporting ([PS_049](#)) (September 2023)
- RAG Assessment (PS_050) (October 2023)
- Zone of Theoretical Visibility - Colts Hill Bypass (PS_052) (October 2023)
- Provisions of Sustainable Travel ([PS_053](#)) (November 2023)
- SWECO Strategic Transport Assessment ([PS_103](#)) (April 2024)
- Modal Shift Analysis Technical Note ([PS_100](#)) (April 2024)
- Strategic Transport Assessment Addendum ([PS_104](#)) (June 2024)
- A264 Pembury Road corridor – Junction capacity assessment ([PS_101](#)) (June 2024)
- Junction Hotspot Comparison ([PS_102](#)) (June 2024)
- Introductory Note to Highway Modelling Reports ([PS_099](#)) (September 2024)

3.2 NH have been a key party in the production of the above documents and direct liaison and feedback has been sought throughout their production. This has allowed any matters of clarification to be sought and resolutions agreed so that a mutually agreeable way forward can be achieved.

3.3 Discussions have continued between the parties in the spirit of collaborative working on a number of aspects. This includes the most recent assessment documents which are subject to the Local Plan Consultation of September 2024.

- 3.4 The parties intend to continue collaborative working concerning any further work in the interests of ensuring the most appropriate outcomes in respect of the SRN (A21) and the strategic growth proposed in the Local Plan.
- 3.5 Table 1 (below) summarises the additional transport-related work supporting the Council's response to the Inspector's Initial Findings and NH's engagement and current position. This highlights constructive engagement between both parties.

Table 1: Engagement with National Highways on Additional Transport Evidence

Highways Evidence	Engagement	Updated Position
Strategic Transport Assessment: Modelling Appraisal (PS_103)	NH engaged during preparation, including review and feedback on model (<i>comments provided on Stages 1 to 3 Part 2 work between April 2023 and December 2023</i>)	NH satisfied with outcomes which informed NH's Hearings statements (Matters 4 and 7) and response to consultation on additional evidence (September 2024)
Modal Shift Analysis (PS_100)	NH engaged during preparation (<i>Comments provided in association with Stage 2 and Stage 3 modelling discussions</i>)	NH satisfied with outcomes which informed NH's Hearings statements (Matters 4 and 7) and response to consultation on additional evidence (September 2024)
Junction Hotspot Comparison (PS_102)	NH engaged during preparation (<i>Comments provided in association with Stage 2 and Stage 3 modelling discussions and during subsequent review of Council's response to Inspector's Initial Findings</i>)	NH satisfied with outcomes which informed NH's Hearings statements (Matters 4 and 7) and response to consultation on additional evidence (September 2024)
Pembury Road corridor – Junction capacity assessment (PS_101)	NH engaged during preparation (<i>Comments on earlier SWECO work also relevant to Stantec report; additional specific comments on early</i>	NH satisfied with outcomes which informed NH's Hearings statements (Matters 4 and 7) and response to consultation

Highways Evidence	Engagement	Updated Position
	<i>findings provided May 2024)</i>	on additional evidence (September 2024)
Strategic Transport Assessment Addendum (PS_104)	NH engaged during preparation (<i>Comments provided June / July 2024; earlier comments from previous stages of work also referred to</i>)	NH satisfied with outcomes which informed NH's Hearings statements (Matters 4 and 7) and response to consultation on additional evidence (September 2024)
Infrastructure Delivery Plan (PS_105)	NH engaged during update to the Plan (<i>at various stages including prior to hearings and formal consultation</i>)	NH support the updates but seek inclusion of a detailed trajectory for development including the supporting infrastructure to inform the monitor and manage regime - see NH response to consultation on additional evidence (September 2024) <u>TWBC Response</u> – A schedule for infrastructure (including highways infrastructure) to support the Strategic Sites is now included within the updated Strategic Sites Policy SS1. This is able to inform the Monitor and Manage regime.
Highway Modelling Reports (PS_099)	NH engaged during preparation (<i>comments provided on Stages 1 to 3 Part 2 work between April 2023 and December 2023 in relation to material contained in referenced reports PS_047 to PS_049</i>)	NH satisfied with outcomes which informed NH's Hearings statements (Matters 4 and 7) and response to consultation on additional evidence (September 2024)
Policy STR/SS1 – The Strategy for Paddock Wood including land at east Capel	NH engaged during the update to the policy	NH support the updates but seek inclusion of wording on vision-led development and monitor and manage to align with national policy (DfT

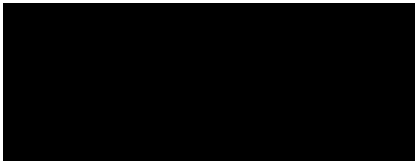
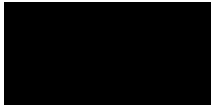
Highways Evidence	Engagement	Updated Position
		Circular 01/2022) – see NH response to consultation on additional evidence (September 2024) <u>TWBC Response</u> – A Monitor and Manage approach is embedded within the IDP and a specific Monitor and Manage policy will be incorporated into the Local Plan through the Main Modifications process.

4.0 Future working

4.1 Both TWBC and NH agree to continue to work together effectively and positively on transportation matters. Both parties are committed to continued collaborative working to ensure the Local Plan delivers sustainable growth supported by the necessary highway infrastructure at the right place and the right time within the borough.

5.0 Signatories

5.1 This statement has been prepared and agreed by the following organisations:

<p>Tunbridge Wells Borough Council</p> <p>Signature </p> <p>William Benson, Chief Executive</p> <p>Date: 12 November 2024</p>	<p>National Highways</p> <p>Signature </p> <p>Date: 11 November 2024</p>
---	---