



Planning Policy
Planning Services
Tunbridge Wells Borough Council
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Growth and Communities

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BY EMAIL ONLY

30 May 2025

Dear Sir / Madam,

Re: Public Consultation on the Tunbridge Wells Borough Council Local Plan Main Modifications

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the Tunbridge Wells Borough Council Local Plan Main Modifications.

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

Section 4: The Development Strategy and Strategic Policies

MM16 – Policy STR 1 The Development Strategy

Development Investment Team:

The County Council, as a key infrastructure and service provider, notes on page 19:

“Early Review of the Local Plan

Following adoption of the Local Plan, the Council will publish an update to its Local Development Scheme (LDS). This shall set out a timetable for an early review of the Local Plan, which shall commence within six months of adoption of the Local Plan.”

The County Council would ask that it is involved in the early review of Tunbridge Wells Borough Council (TWBC) Local Plan. This is to ensure that infrastructure, particularly education, is considered and planned for appropriately.

MM18 – Policy STR 2 Place Shaping and Design

Highways and Transportation:

The County Council, as Local Highway Authority, recommends an amendment to the following paragraph (page 24):

“Prioritise the needs of pedestrians, cyclists, and public transport services, ~~Therefore, Highways Infrastructure should only be proposed~~ in line with the Vision defined for a site and in-line with associated agreed Monitor and Manage frameworks.”

The additional new wording is not considered to be appropriate by the Highway Authority and we therefore ask that this be omitted as it does not reflect current policy. We would ask that any additional wording should be consistent with the [National Planning Policy Framework \(NPPF\)](#), especially paragraphs 109, 110 and 115. The additional text that is proposed adds an additional threshold that is not required. It does not state in the NPPF that improvements to highway infrastructure should not be identified.

MM22 – Section 4: Infrastructure and Connectivity

Highways and Transportation:

The County Council, as Local Highway Authority, notes on page 25:

“... the IDP sets out the infrastructure that is required to support the growth proposed in the Local Plan, including specific projects.”

The County Council has provided commentary on the latest version of TWBC’s [Infrastructure Delivery Plan](#) (IDP), please find this located at Appendix A.

Development Investment Team:

The County Council, as a key infrastructure and service provider, notes the additional wording to the following bullet point (page 26):

“... (or if expansion is not feasible, a new 4FE Secondary School on safeguarded land)”

The County Council welcomes the additional wording to provide an expansion or a new school option but would like it noted that this is dependent on future housing numbers and subsequent demand and therefore the wording of the policy needs to reflect this.

MM23 – Policy STR 5 Infrastructure and Connectivity

Highways and Transportation:

The County Council, as Local Highway Authority, notes on page 27:

“Second paragraph of the Transport section of Policy STR 5 as follows: The Infrastructure Delivery Plan has been updated to reflect [DfT Circular 1/22](#) (Strategic road network and the delivery of sustainable development, updated December 2022) to outline the required Vision and Validate/Monitor and Manage requirements.”

The County Council welcomes this and has provided commentary on the latest version of TWBC's [IDP](#), located at Appendix A.

MM25 – Policy STR 6 Transport and Parking

Highways and Transportation:

The County Council, as Local Highway Authority, recommends on page 28, the removal of Tudeley Village, as its inclusion is no longer required.

The Local Highway Authority would suggest that the following additional schemes should be included as identified in the Monitor and Manage Strategy:

- i. Enhancements to the B2017 through Five Oak Green and its junction with Hartlake Road
- ii. A228/Maidstone Road Junction, Pembury
- iii. A228/Alders Road/Crittenden Road
- iv. B2160/ Chestnut Lane/Brenchley Road Matfield Crossroads
- v. A267/B2169 Birling Road

The County Council, as the Highway Authority, would also encourage the inclusion of the junction of A264/A21 south-western dumbbell roundabout and Pembury Road/Sandhurst Road as well as adding in Sustainable Travel and Active Travel Schemes. These include the Paddock Wood Town bus service, an inter-urban service between Paddock Wood and Royal Tunbridge Wells and lastly, [Local Cycling and Walking Infrastructure Plan](#) (LCWIP) schemes.

Section 5: Place Shaping Policies

MM33 – Policy STR/RTW 1 The Strategy for Royal Tunbridge Wells

Highways and Transportation:

The County Council, as Local Highway Authority, recommends amending the wording on page 36, to:

“After criterion 11 add new criterion: Contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

MM50 – Policy AL/RTW 0 Land at Beechwood Sacred Heart School

Highways and Transportation:

The County Council, as Local Highway Authority, recommends amending the wording on page 46, Criterion 7 to:

“...including contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

MM68 – Policy AL/RTW 19 Land to the north of Hawkenbury Recreation Ground

Highways and Transportation:

The County Council, as Local Highway Authority, recommends amending the wording on page 58, item 10 to:

“...including contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

MM81 – Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Highways and Transportation:

The County Council, as Local Highway Authority, agrees to the provision of a developer funded bus service for Paddock Wood Town. The County Council recommends for item 3, point (k) to include the wording ‘...and provide a Paddock Wood Town bus service in accordance with Policy TP2...’.

The County Council further recommends that page 90, item 9, should include a mention of the improved bus services from Paddock Wood Town and the enhanced inter-urban service between Paddock Wood and Royal Tunbridge Wells. This addition is suggested to provide better links between the development parcels, key facilities and services and Royal Tunbridge Wells.

The County Council, as Local Highway Authority, notes on page 94, item 15:

“The infrastructure to be funded, Bus services to be listed as above ... f) subject to monitoring evidence collected in accordance with an agreed Monitor and Manage Framework the further improvement of the highway network through a series of junction improvements (as set out in the council’s Infrastructure Delivery Plan) may be required at: i) A267/B2169 Birling Road ii) B2017/Hartlake Road iii) A228/Maidstone Road.”

The County Council recommends an amendment to the wording on the points below:

- ii) B2017 through Five Oak Green and the Junction with Hartlake Road

The County Council would ask that three more additional items to be included onto point (f) as shown below:

- iv) A2367/B2169 Birling Road
- v) A228/Alders Road/Crittenden Road
- vi) B2160/ Chestnut Lane/Brenchley Road Matfield Crossroads.

The amendments are suggested to note that highway improvements are non-specific and allow the wording to be more flexible as there may be alternative solutions to junction improvements.

MM91 – Policy STR/CA 1 The Strategy for Capel Parish

Highways and Transportation:

The County Council, as Local Highway Authority, recommends on page 130, item 5, that the wording of '*traffic management and/or speed reduction measures in Five Oak Green*' should include 'enhancements to the B2017 through Five Oak Green and the Junction with Hartlake Road.'

The transport strategy to support the TWBC Local Plan includes sustainable transport improvements and highway improvements where the increase in traffic generated by the development will have a significant impact. The locations identified for highway improvement schemes are:

- i. The Colts Hill Bypass and associated junction improvements at Badsell Roundabout
- ii. Somerhill Roundabout improvements
- iii. Hop Farm Roundabout improvements
- iv. Junctions on the Pembury Road Corridor

Furthermore, subject to monitoring evidence collected in accordance with an agreed Monitor and Manage Framework, further improvement of the highway network through a series of junction 7 improvements may be required at:

- 1. B2017 through Five Oak Green and its junction with Hartlake Road
- 2. A267/B2169 Birling Road
- 3. B2017/Hartlake Road
- 4. A228/Maidstone Road
- 5. A228/Alders Road/Crittenden Road
- 6. B2160/ Chestnut Lane/Brenchley Road Matfield Crossroads

The County Council recommends that these are included in the Main Modifications and to be added into the wording.

MM110 – Policy AL/HA 4 Land off Copthall Avenue and Highgate Hill

Highways and Transportation:

The County Council, as Local Highway Authority, requests that the requirement for emergency access on page 152, Criterion 3, be removed. Instead, it recommends reinstating

the emergency access requirement as specified in Condition 13 of planning application reference [TW/23/02362](#).

Planning application reference [TW/23/02362](#) provides details of the emergency access, which was originally required by Condition 13 of planning application [TW/20/02788](#) (Heading 9), allowed at appeal. The County Council suggests that the wording be amended to ensure that there is the appropriate provision for the emergency access to the satisfaction of the Local Highways Authority.

MM151 – Policy PSTR/PE 1 The Strategy for Pembury Parish

Highways and Transportation:

The County Council, as Local Highway Authority, recommends on page 218, item 3, that ‘*seek proportionate developer contributions*’ should include the delivery via a S278 agreement of highway infrastructure, sustainable transport initiatives and proportionate development contributions. Also, the County Council recommends that point 3 a.) ‘*necessary highway and junction improvements and mitigation measures*’ should be changed to ‘highway infrastructure and sustainable transport/active travel improvements.’

Furthermore, point 3 a.) (i) should be changed from ‘*speed reduction*’ to ‘Speed reduction in Pembury village.’ Contributions to bus services should also be included in the list. Point 3 a.) (iii) ‘*improvement works to the access of the A21 roundabout, southbound exit*’ should be amended to ‘highway improvements to the A264/A21 south west dumbbell roundabout.’

Point 3 a.) (v) ‘*contributions to be used towards improvements to active travel infrastructure and measures, including bus journey times along the A264 Pembury Road*’ should be amended to ‘contributions towards improvements to active travel infrastructure, sustainable transport measures, including improved bus journey times and junction improvements along the A264 Pembury Road.’ The addition of sustainable travel to the wording is suggested as it is intended to deliver improved bus services along the A264 corridor.

MM153 – Policy AL/PE 1 Land rear of High Street and west of Chalket Lane

Highways and Transportation:

The County Council, as Local Highway Authority, recommends amending the wording on page 221, Criterion 12 to:

“...including contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

MM155 – Policy AL/PE 2 Land at Hubbles Farm and south of Hastings Road

Highways and Transportation:

The County Council, as Local Highway Authority, recommends amending the wording on page 224, Criterion 13 to:

“...including contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

MM157 – Policy AL/PE 3 Land north of the A21, south and west of Hastings Road

Highways and Transportation:

The County Council, as Local Highway Authority, recommends amending the wording on page 227, Criterion 13 to:

“...including contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

MM159 – Policy AL/PE 4 Land at Downingbury Farm, Maidstone Road

Highways and Transportation: The County Council, as Local Highway Authority, recommends amending the wording on page 232, item 9 to:

“...including contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

MM161 – Policy AL/PE 4B Land at Downingbury Farm (east), Maidstone Road

Highways and Transportation: The County Council, as Local Highway Authority, recommends amending the wording on page 237, item 7 to:

“...including contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

MM164 – Policy AL/PE 6 Woodsgate Corner, Pembury

Highways and Transportation: The County Council, as Local Highway Authority, recommends amending the wording on page 242 to:

At the end of criterion 6 add “...including contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

MM168 – Policy AL/PE 8 Owisnest, Tonbridge Road

Highways and Transportation: The County Council, as Local Highway Authority, recommends amending the wording on page 250, Criterion 8 to:

“...including contributions to be used towards a A264 corridor improvements with a view to improving sustainable and active travel infrastructure, including bus journey times along the A264 Pembury Road.”

The County Council suggests this amendment to provide more flexibility. The inclusion of sustainable travel is intended to improve bus services along the A264 corridor.

Section 6: Development Management Policies

MM247 – Policy TP 2 Transport Design and Accessibility

Highways and Transportation: The County Council, as Local Highway Authority, recommends on page 353, Criterion 7, that ‘... (such as 20mph speed limits, road narrowing, speed tables, etc.)’ should be amended to ‘(including the geometric design such as bends, junctions, 20mph speed limits and traffic calming measures).’

The suggested amendment would allow for the inclusion of design features such as the curvature of the road and the presence of bends which physically reduce the speed of traffic. This is the preferred method of speed reduction with traffic calming provided to enhance the road design to further reduce speeds and improve safety.

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

Appendix A

[Tunbridge Wells Borough Council Infrastructure Delivery Plan \(IDP\) March 2025](#)

Overview of Infrastructure

Theme 1: Transport

Highways and Transportation: The County Council, as Local Highway Authority, notes on page 23, point 3.18:

“The A228 links the borough to Paddock Wood, West Malling, Maidstone, and the Medway Towns. The road suffers restricted width on some sections, leading to peak hour congestion, and there is a poor accident record on the A228 at Colts Hill. A relief scheme for Colts Hill has been explored in the past by Kent County Council. No scheme has been progressed to date, although a funding bid was submitted to the Major Roads Network programme in 2019 to deliver a scheme.”

The County Council notes from its own evidence that there is no crash cluster problem between 2021 – 2024, hence we would ask that this should now be reflected in the wording of this policy.

Furthermore, the County Council notes on page 23, point 3.19 that an improvement scheme is currently being delivered to mitigate the impact of development, planning application reference [TW/20/02788/FULL](#) with the development being funded by Dandara.

The Colts Hill Bypass is required to provide additional capacity and resilience to the A228 to support the TWBC Local Plan growth. The A228 is the preferred route for the traffic generated by the Paddock Wood and East Capel strategic development sites to access the SRN (the A21) avoiding the B2160 through the village of Matfield and the congested junction of the B2160/A21 at Kippings Cross.

The improvement to the A228 has been identified as a requirement in the Strategic Transport Assessment and is included in the IDP and viability assessment documents supporting the TWBC Local Plan. The County Council recommends that this scheme should not be removed from the highway infrastructure requirements.

Highways and Transportation: The County Council, as Local Highway Authority, notes on page 35, ‘Additional future requirements needed to deliver growth proposed in the Local Plan’, point 3.64:

“Bus priority measures on A264 Pembury Road Bus only route through Calverley Park Gardens removing access for other through traffic (except for cycle and pedestrians).”

The County Council notes that the current scheme being developed proposes two-way buses and cycles along Calverley Park Gardens and one way for other vehicles. [TWBC Local Plan](#)

(submitted October 2021), Policy STR/RTW 1 The Strategy for Royal Tunbridge Wells, page 77, item 10 states '*Deliver measures to reduce congestion on the radial routes into the town, including the A26 and A264, while prioritising active travel*'. This is non-specific and allows for the scheme - which is only at feasibility design stage - to be amended if needed.

Highways and Transportation: The County Council, as Local Highway Authority, notes on page 40, Table 3: Summary of transport needs for settlements within Tunbridge Wells borough, Transport Mode 'Pedestrians & Cyclists'. It recommends that Pembury to Hawkenbury is included within the list of points above and to refer to comment above regarding Calverley Park Gardens.

In addition, regarding Transport Mode 'Highways', the County Council recommends not to specify the roundabout scheme as an alternative improvement scheme may be better suited. Furthermore, the County Council recommends two points on page 41, Table 3: Summary of transport needs for settlements within Tunbridge Wells borough, under Settlement heading Pembury to be added. This includes A264 corridor schemes and the Walking and Cycling schemes to include the Pembury to Hawkenbury route.

Lastly, the County Council recommends three points to amend the points on page 41, Table 3: Summary of transport needs for settlements within Tunbridge Wells borough, under Settlement heading Paddock Wood/Capel. This includes remove reference to bus gates at Five Oak Green, bus improvements to include a Paddock Wood Town service and inter-urban service to Royal Tunbridge Wells and shuttle signal bridge over railway at Paddock Wood, which is not supported by the County Council.

Highways and Transportation: The County Council, as Local Highway Authority, notes on page 104, Table 14: Sport and recreation provision needs for settlements within Tunbridge Wells borough, under heading Paddock Wood and East Capel, that the extension to the Putlands Leisure Centre should include improved pedestrian and cycle access.

Summary

Appendix 1: Infrastructure Delivery Schedule

Highways and Transportation: The County Council, as Local Highway Authority, would recommend for the IDP to be updated to reflect the comments above.

General

Highways and Transportation: The County Council, as Local Highway Authority, would recommend additional schemes to be included in the Monitor and Manage Strategy in both the proposed Main Modification document and the IDP document as set out below:

- i) Enhancements to the B2017 through Five Oak Green and its junction with Hartlake Road
- ii) A228/Maidstone Road junction, Pembury
- iii) A228/Alders Road/Crittenden Road
- iv) B2160/ Chestnut Lane/Brenchley Road Matfield Crossroads
- v) A267/B2169 Birling Road