

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to the Evidence Base

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
1-1	Christine Churchill on behalf of Brenchley and Matfield Parish Council	Brenchley and Matfield Parish Council	Christine Churchill	Parish counsellor	5 Transport related matters	Ensure the Number 6 bus does run through Matfield	Would like clarification on the route of the number 6 bus and to ensure it continues running through Matfield. (comment is in reference to supporting document PS_041 Paddock Wood Bus Service Option)	The Tunbridge Wells Bus Feasibility Review (PS_040) assumes that the route of the number 6 bus continues to run through Matfield.
3-1	Helen Adam	Postern Lane Residents' Association			5 Transport related matters		<p>Postern Lane (which is a private road falling part within TWBC and part within TMBC) residents are against the road becoming part route D connecting Tonbridge and Five Oak Green, as referenced in the Philip Jones Associates report 2021.</p> <p>There is an existing right of way for foot traffic only.</p> <p>Practical issues include: narrow single track road with few passing spaces, blind corners, lane is unlit, part of the lane frequently floods.</p> <p>Residents would not consent to the changes required to address these issues and bring the lane in line with current design guidance for cycle paths.</p>	<p>Reference to Cycle Route D has now been removed from the proposed improvements to cycle routes.</p> <p>However, the route is included in the Tunbridge Wells LCWIP Phase 2 (Core Documents 3.115 b(i) and 3.115 b(ii)) and is currently used as a walking and cycling route by the public.</p>
10-2		Obsidian Strategic	Daniella Marrocco		2 Green Belt		<p>Support the Green Belt Stage 3 Study Addendum and the conclusions that the original Sustainability Appraisal and Strategic Housing and Economic Land Availability Assessment remain valid.</p> <p>Support the limited release of Green Belt land to enable housing delivery on appropriate and sustainable sites which are assessed to have a low harm to the Green Belt, including AL/PE 2, which Obsidian Strategic Asset Management have a controlling interest in.</p>	This is noted.
28-5	CPRE Kent on behalf of CPRE Kent	CPRE Kent	CPRE Kent		5 Transport related matters		<p>Transport - legally compliant but unsound</p> <p>Concerned the details within PS_058 will not come to fruition. Supports measures to reduce the reliance on private car journeys, and the commitment to active travel and public transport. However, it is not clear how this will be achieved.</p> <p>Paragraph 7.1.4 of PS_058 sets out the frequency of bus route 6 could be increased</p>	Policy STR6 of the Submission Local Plan clearly prioritises active travel and public transport provision to provide an alternative to use of the private car. The Council has therefore prepared a Local Cycling and Walking Infrastructure Plan (LCWIP) (Core Document 3.115) and bus studies (Core Documents PS_040 and PS_041) to support these priorities. The Council has also prepared Topic Paper PS_053 which pulls together

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							<p>from one hour to every 15 minutes. However, it is not clear there is an appetite from the local bus company to ensure this happens. Enquiries from Brenchley and Matfield Parish Council to KCC appear to suggest there are no definitive plans by Arriva to revise the timetable and there is no mechanism to force Arriva to make the changes to its service provision.</p> <p>Concerned there is no commitment to the safeguarding or purchase of land to achieve the proposed cycle routes as shown in figure 9 and para 7.9 of PS_053. Also question whether a cycle route using dark, winding country lanes would be safe enough to attract regular use by cyclists and provide a realistic alternative to the private car.</p>	<p>provisions for sustainable transport and active travel.</p> <p>Improvements to bus services that are required by the proposed growth would be funded by developer contributions in the first instance.</p> <p>Discussions were held with bus operators when the TW Bus Feasibility Study was started but further, more detailed, discussions will be held with the Kent County Council Public Transport team and local bus operators as planning applications for allocated sites come forward.</p>
63-1	Chantal Brooks	Brenchley and Matfield Parish Council			5 Transport related matters		<p>5.16 and 5.20 - unsound 5.16 - Not clear which options/bus services this paragraph relates to and whether bus services through Matfield will be increased (forms basis/justification of sustainability of proposed housing allocations). 5.20: Fails to recognise existing traffic problems and highway safety issues e.g. difficult to cross B2160 in Matfield village, Brenchley Road in Brenchley village, blind bends at Pixot Hill and long traffic queues at Kippings cross junction. Will be made worse. Improvements to bus routes may not be forthcoming. More certainty needed. Para 5.20 after 'road infrastructure projects' should include pedestrian safety improvements and speed reduction measures in Matfield and Brenchley. Proposed development at Horsmonden will also increase pressure on local roads (some of which are important features as historic rural lanes in the National Landscape). Applications are often misleading re traffic volume and realistic routing depending on direction of travel.</p>	<p>The Tunbridge Wells Bus Feasibility Review (PS_040) sets out improved bus links including through Matfield.</p> <p>The existing traffic issues in Matfield are recognised and have been discussed with KCC Highways. These were also discussed at earlier hearings.</p> <p>Further discussion about the details of improved bus services would take place as planning applications for allocated (or windfall) sites come forward. These would include discussions with the KCC Public Transport team and local bus operators.</p>

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63-4	Chantal Brooks	Brenchley and Matfield Parish Council			15 Proposed strategic policy revisions		BMPC generally supports the revised strategy of providing for a 10 year housing need, removing Tudeley Village and reducing amount of development at Paddock Wood. However, has serious reservations about some of transport aspects as they affect the parish.	This is noted.
65-1	Adrian Toms				5 Transport related matters		Asks that the No.6 bus service be improved rather than reduced, and run later into the evening	The TW Bus Feasibility Review (PS_040) proposes enhancements to existing bus services.
67-2	Andrew Stanley				2 Green Belt		<p>Green Belt: Unsound:</p> <ul style="list-style-type: none"> • Exceptional circumstance required by the NPPF have not been met • TWBC has not properly reviewed all Green Belt sites or brownfield/non-Green Belt sites • (PS-054) Paras 2.25 & 2.27 - veiled threat to look at Five Oak Green as Tudeley (STR/SS3) has been rightly abandoned. Should refer to Capel's Neighbourhood Plan which anticipates appropriate levels of housing and identifies type of housing needed locally. 	TWBC considers that the revised development strategy consulted upon is acceptable and meets the exceptional circumstances test required by the NPPF to release sites from the Green Belt. Both Green Belt and non-Green Belt sites have been robustly assessed. The Green Belt Stage 3 Addendum (PS_035) and associated SHELAA sheets (PS_036) demonstrate that there are no other reasonable alternative Green Belt sites suitable for allocation at this time – this is dealt with in more detail in the Development Strategy Topic Paper Addendum (PS_054) at Section 2. Non Green Belt sites have been robustly assessed through the previous SHELAA and dealt with at previous hearing sessions – including the Site Selection Methodology Matter 5, Issue 1 session.
67-9	Andrew Stanley				5 Transport related matters		<p>Transport matters - Unsound:</p> <ul style="list-style-type: none"> • (PS_054) Para 5.13 (low traffic neighbourhoods, with good pedestrian and cycling grids and managed vehicle movements) - TWBC's belief that far greater numbers will walk/cycle does not bear scrutiny. The proposed development in East Capel and Paddock Wood will be separate semi-remote communities and residents will drive. • No convincing infrastructure included in the Plan • (PS_046) Table 8 - traffic light system for Paddock Wood rail bridge - concerns: long waits to cross rail bridge, isolation of ambulance station, traffic fumes, difficulty entering/leaving roads (e.g. Allington Road, Mount Pleasant, Station Road, Eldon Way) 	<p>Policy STR6 of the Submission Local Plan clearly prioritises active travel and public transport provision to provide an alternative to use of the private car. The Council has therefore prepared a Local Cycling and Walking Infrastructure Plan (LCWIP) (Core Document 3.115) setting out a network of proposed routes and measures to improve infrastructure for both pedestrians and cyclists.</p> <p>Further design work for pedestrian and cycle routes will be undertaken as planning applications for allocated (or windfall) sites come forward. The Council will also liaise with Active Travel England.</p> <p>Shuttle signal Bridge Paddock Wood High Street identified in Table 8 is there to minimise disruption and to enable better access for sustainable transport through the town.</p>

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70-1	Dave Smith				Appendix A: List of Post Submission Evidence Base Documents		<p>The substantial and extremely technical information in the evidence-based documents are hard to digest and discourage residents to comment on, naturally assuming their agreement to the proposals which is not the case.</p> <p>The models being used in the core documents are either indicative or completely wrong owing to their limited and inadequate input. Precautionary principle should be employed for important decisions as widely as possible and NOT on shifting or transient behavioural trends.</p> <p>Examples includes assumption flooding “might” be less likely in the future, or A228 via Colts Hill improvement proposed to only be postponed or cancelled. Local changes should be completely conditional on preceding improvement actually occurring and carried out in tandem rather than in anticipation.</p>	The documents consulted on build on/are mostly amendments to documents consulted on at earlier stages of plan-making. They are by their very nature often technical documents that can be difficult to understand. Throughout the consultation process TWBC officers have been available to assist anyone who might require assistance with understanding documents or more generally with understanding the consultation process, viewing documents etc.
70-4	Dave Smith				5 Transport related matters		A228 via Colts Hill improvement proposed to only be postponed or cancelled. Local changes should be completely conditional on preceding improvement actually occurring and carried out in tandem rather than in anticipation.	Highway improvements have been identifies as part of the extensive transport modelling that has been undertaken. This is outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in junctions or routing etc will be considered at the time.
91-4	Peter Rawlinson	Gleeson Developments Ltd			The Green Belt Stage 3 Study Addendum (LUC, May 2023) [PS_035]		<p>Improper consideration for alternative sites in Green Belt:</p> <ul style="list-style-type: none"> Neglect the possibility of potential mitigation measures to Green Belt’s harm, hence demand reassessment of suitability of sustainable sites for allocation The western part of ‘Land at Pembury Road, Tunbridge Wells’ (SHELAA ref 99) makes only a low contribution to Green Belt purposes, hence not causing unacceptable harm when releasing (evidence on impact stated in the EDP report submitted at Reg 19 stage) 	<p>The Green Belt Stage 3 Study addendum [Core Document PS_035] undertaken following the Inspector's Initial Findings Letter has been undertaken using the same methodology as the original Stage 3 Green Belt Study [Core Document 3.141].</p> <p>This site was included within the Green Belt Stage Three Addendum as it fell within the scope of work requested by the Inspector. The conclusions on that work and the Councils approach are set out within the Green Belt Addendum, the relevant SHELAA sheet (PS_036) and the Development Strategy Topic Paper Addendum January 2024 (PS_054).</p> <p>The site has been considered through the SHELAA process and the conclusions with regards to its</p>

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								suitability for allocation remain the same irrespective of the additional Green Belt work.
111-1	Francesca Potter	Kent County Council			5 Transport related matters		<p>PS_039 RAG Assessment - Access and Movement - Five Oak Green Bypass KCC is supportive of the reference to the need for engagement in respect of the PRoW network and welcomes continued collaboration.</p> <p>PS_040 Tunbridge Wells Bus Feasibility Review - WSP KCC raise the following:</p> <p>The network in Kent is de-regulated and any proposals to make fundamental changes need to be done in conjunction with current bus operators. Figure of CPI of 2.5% is questioned and more robust figure would be 10%. Intensification of PW to RTW service could be phased so that frequency increases as development is built out.</p> <p>Data from Arriva would be helpful to help inform and discount some options presented. Noted that early engagement with Arriva has taken place but further engagement should take place once options are shortlisted.</p> <p>PS_041 - Paddock Wood Bus Service Options - WSP Technical Note - KCC raise the following specific points in relation to Highways and Transportation;</p> <p>Route the bus through the southern Persimmon development rather than along Church Road/Queen Street and Mascalls Court Road.</p> <p>Enhancements to bus stops on Station Road to be considered. Service routing and network pattern appears sound.</p> <p>Costs appear to relate to £500 per vehicle per day which is considered to be light.</p> <p>Mode share at 5% is absolute maximum.</p>	<p>Supportive points raised by KCC regarding the evidence (PS_039) are noted.</p> <p>The TW Bus Feasibility Review (PS_040) sets out options for improvements to the current bus network in support of the proposed growth in the plan.</p> <p>The Council will be continuing discussions with Kent County Council Highways in order to address any issues raised.</p> <p>As planning applications come forward, further detailed discussions will take place with KCC Public Transport team and bus operators.</p> <p>The Paddock Wood Bus Service Options Technical Note (PS_041) has been prepared to support the proposed growth at Paddock Wood. Discussions about the options presented will continue with KCC Highways as necessary.</p> <p>Further detailed work will be undertake as planning applications for allocated (or windfall) sites come forward.</p>

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							<p>KCC consider that 0600-2000 service pattern would be appropriate.</p> <p>Benefits of Demand Responsive Transport in this context is not fully understood.</p> <p>Consideration of alternative bus service for outlying areas.</p> <p>PS_046 - Paddock Wood Strategic Sites Master Planning and Infrastructure Study - PW Growth Follow on Study</p>	
111-3	Francesca Potter	Kent County Council			6 Infrastructure		<p>KCC make the following comments in regards to; PS_061 Addendum to Local Plan Viability Assessment Main Report</p> <p>Development Investment - KCC note that Dixon Searle Partnership reference a benchmark land value for Local Plan land as £25k/ha, which would appear to be agricultural land value. This is acceptable as long as KCC are provided with land for education at nil cost. Also neighbouring landowners/developers need to have land equalised so that KCC is provided land appropriately and efficiently.</p> <p>PS_063 - Summary of proposed modifications to the Development Strategy, following Inspectors Initial findings in November 2022.</p> <p>The Strategy for Paddock Wood - KCC welcomes the reference to community and educational facilities within part b as well as the reference to development proposals being supported by planning obligations to enable infrastructure such as highways mitigation works, education facilities and other necessary infrastructure.</p> <p>SuDS - KCC accepts the modifications, including SLP Mod 9, with support to policies EN24, EN25 and EN26 which provide additional protection and security with regards to SUDs drainage systems and requirement for betterment.</p> <p>Land to the north of Birchfield Grove - KCC welcomes the inclusion of reference to contributions being provided to mitigate the</p>	<p>Where KCC require land to be transferred there will be a requirement for this to be as per normal land transfer agreements for KCC Education.</p> <p>The other supportive points raised by KCC Education on PS_063 are noted.</p>

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							impact of the development in accordance with Policy STR/HA1.	
123-1	Liz Blightman				6 Infrastructure		<p>Support for the Colts Hill Bypass</p> <ul style="list-style-type: none"> Context: Dangerous, pedestrian-unfriendly with lorries, also when exiting the driveway onto the road Associated noise, air pollution, traffic safety if widening road Considered be an inappropriate development in the related attached evidence-based report, but the harm should be outweighed by other benefits, e.g. moderate and negligible harm to Green Belt <p>Firmly object to the alternative of 4-metre widening on A228 as in:</p> <ul style="list-style-type: none"> Multiple impacts on listed buildings, property's values, noises, air quality, loss of amenity and privacy (believed to be underpinned by Human Rights Act 1998 including Article 1 Protocol 1 right to property and Article 8) 	The support for the Colts Hill Bypass are noted. Should the 4m widening of the A228 be necessary this will be undertaken to ensure that the road is safe, that impacts on Air Quality are taken into consideration and minimised where possible.
135-4		Natural England			Appendix A: List of Post Submission Evidence Base Documents		Updated HRA addendum(August 2023) - Natural England (NE) satisfied that the revised development strategy is unlikely to impact HRA findings.	This is noted.
153-2	Fernham Homes		Danielle Dunn		2 Green Belt	The site known as 'Land at Tolhurst Road' should be included in the Submission Local Plan as a residential site allocation	<p>Green Belt - Legally non-compliant/unsound:</p> <p>Although the production of Green Belt studies to support the SLP is supported, the interpretation of the outcomes is considered flawed in relation to the site allocation selection process, SHELAA site 143 - Land at Tolhurst Road, for the following reasons :</p> <ul style="list-style-type: none"> Site has been identified in the Green Belt Stage 3 assessment, as having 'Low-Moderate' harm to the Green Belt if released for development, and is also identified as such within the group of FOG sites listed at Para 2.25 of Document PS_054. 	The Council does not consider assessment of the reasonable alternative Green Belt sites in the SHELAA review of Green Belt sites (PS_036) to be flawed. The SHELAA site assessment sheet for site 143 Land at Tolhurst Road, Five Oak Green acknowledges the Low harm rating and that the site is suitable as a potential allocation. It further identifies that the site could be considered as part of the proposed Local Plan review. As set out in the original SHELAA main report (Core Document 3.77) at para 1.3 the SHELAA is not an allocations document; it does not form Council policy but provides a technical assessment of the potential of sites for allocation for future land supply. As such, it informs the plan-making process, but its findings must be considered alongside the other evidence in

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							<ul style="list-style-type: none"> This is the only site considered to have a low harm rating in FOG in Table 3.1 of Document PS_035 and is therefore considered to be the most suitable of all the sites, as a reasonable alternative site in the Green Belt The SA sets out that the site is in an area which makes a Relatively Weak contribution to safeguarding the countryside from encroachment, that the impact on the adjacent Green Belt will be Minor and the resulting harm of its release will be Low Consultation documentation states that approach to the now identified lesser Green Belt Harm to some sites at FOG is considered through an assessment set out in 'Section H' (PS_054, para 2.28) of the Local Plan Development Strategy Topic Paper –Addendum. However, there is no Section H, making the consultation flawed and unlawful. The additional Green Belt assessment (PS_035) does not provide a basis for concluding other previously rejected “omission sites” should not come forward for inclusion in the SLP. Only reference is in Document PS_054, para 2.23 – indicating there are often other reasons concluding why a site is unsuitable for allocation. In addition para 13.2 (Document PS_037) makes reference to smaller housing sites at FOG being considered as part of the early Local Plan review. There are no reasons/clear justification to conclude why this site is not suitable for allocation at this time - approach to site selection is considered legally non-complaint/unsound. 	<p>determining site allocations to be included in the new Local Plan.</p> <p>If the Council were to seek to include additional site allocations at this stage, it would be necessary for the Council to first consider whether there are alternative Brownfield/ non-Green Belt sites suitable for allocation in the first instance, which would be best done through a further Call for Sites, and consideration of an alternative development strategy for the borough as a whole, thereby delaying adoption of the Local Plan further. The Council submits that the most suitable way forward is to progress the Local Plan with a 10 year housing land supply, with a commitment to an early review of the Plan.</p> <p>The Council does not agree with the proposed modification put forward.</p>
167-4		Bellway Homes Strategic	David Murray-Cox	Turley	Analysis of the Stage 3 Addendum report		<p>PS_035 Strategic Housing and Economic Land Available Assessment: Reasonable Alternative Green Belt Sites (October 2023) Site Reference 53 (land north and south of High Woods Lane) states “This site on balance is highly sustainable, the parcel to the north being less so as it is more detached from the built up area than the southern parcel” - TWBC's evidence base overstates the impact of any</p>	<p>This site was included within the Green Belt Stage Three Addendum as it fell within the scope of work requested by the Inspector. The conclusions on that work and the Councils approach are set out within the Green Belt Addendum (PS_035), the relevant SHELAA sheet (PS_036) and the Development Strategy Topic Paper Addendum January 2024 (PS_054).</p>

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							<p>residential development scheme (such as proposed by Bellway) on these sites. Green Belt Study Stage Three Addendum Assessment of Reasonable Alternative Sites (May 2023)</p> <p>RA/RTW 5 - For areas to north of High Woods Lane, found there would be Very High or High harm (to the Green Belt). No indication in evidence base that TWBC has properly considered the implications of the scheme it is understood to be proposing on the land to the south of the Lane.</p>	<p>Policy AL/RTW19 – Land to the north of Hawkenbury Recreation Ground was discussed at the hearing session on the 21 June 2022 and the Council's response is set out in Hearing Statement Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 39-46).</p>
170-3		Rydon Homes	David Neame	Neame Sutton	The Green Belt Stage 3 Study Addendum (LUC, May 2023) [PS_035]	<p>In summary the following areas of change are required for the Plan to be both legally compliant and sound:</p> <p>[TWBC: these proposed changes relate to multiple comments added under different consultation points]</p> <ol style="list-style-type: none"> 1. The Council needs to ensure that the Plan meets the full objectively assessed needs for the full plan period i.e. up to 2038 at least; 2. Further allocations are needed to ensure Point 1 above is met; 3. Further allocations are needed in any event to enable the Council to demonstrate a 5-year housing land supply at the point of adoption and then to maintain a rolling 5-year housing land supply thereafter; 4. The Green Belt Stage 3 study needs revisiting again to address the 	<p>Green Belt - Legally non-compliant/unsound:</p> <p>Stage 3 Green Belt Addendum Report:</p> <ul style="list-style-type: none"> • The conclusions drawn in the addendum report discount potential reasonable alternatives, such as Site 330 – Finches Farm, Five Oak Green, without having full regard to the available evidence • Apparent addendum report has removed sites from consideration, unrelated to the Green Belt purposes such as site 330, as located within Flood Zone 3b. Consequently there is no Green Belt analysis for this site. • The addendum report is therefore flawed and does not represent a robust analysis of reasonable alternatives • The Landscape and Visual Appraisal (Liz Lake Associates), submitted with the representation (Appendix 2) demonstrates that development of the parcel of land containing site 330 would only result in limited effect on the Green Belt • Had the Council completed a robust/full assessment of reasonable alternatives it would have been in a position to release this site (and others across the Borough) to help meet the shortfall in housing need 	<p>The Green Belt Stage 3 Addendum (PS 035) explains at Chapter 2 what is considered to be a reasonable alternative site to be assessed through the Green Belt Stage 3 Addendum work, and the site assessment methodology. The Council considers that all reasonable alternative sites have been appropriately identified and robustly assessed by the Green Belt Stage 3 Addendum.</p> <p>The Council does not agree with the proposed modifications put forward.</p>

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						<p>deficiencies identified in Section 4 of these Representations and also within the Technical Note prepared by Liz Lake Associates;</p> <p>5. Neither The Five Oak Green Bypass nor The Colts Hill Bypass are currently sound. Should the Council continue to wish to include these two components of transport infrastructure the deficiencies identified in Section 4 of these Representations and the Technical Note prepared by Velocity Transport Planning need to be addressed; and,</p> <p>6. Based on these Representations Rydon Homes' promotion site at Five Oak Green represents an ideal opportunity for allocation in the Plan that will deliver sustainable growth and tangible planning benefits to the wider community in line with the Council's strategic policy objectives.</p>		
170-4		Rydon Homes	David Neame	Neame Sutton	5 Transport related matters	<p>In summary the following areas of change are required for the Plan to be both legally compliant and sound:</p> <p>[TWBC: these proposed changes relate to multiple comments added under different consultation points]</p>	<p>Transport related matters - Legally non-compliant/unsound:</p> <p><u>Five Oak Green Bypass:</u></p> <ul style="list-style-type: none"> • Feasibility - delivering bypass extremely difficult to achieve given land required and multiple landowners. • Potential significant impacts - air quality, noise, safety and the operation aspects of Capel School, not addressed by TWBC 	<p>The Five Oak Green bypass is no longer a requirement for the transport related infrastructure upgrades that support the councils response to the Inspectors Initial Findings. The masterplanning work PS_046 Table 8 shows that Five Oak green is no longer in the infrastructure schedule.</p> <p>A significant level of work has been undertaken on transport modelling to assess the soundness of the plan, including looking at the level of traffic generated and modelling where on the network this will go and what sorts of mitigation is necessary. Highway improvements have been identifies as part</p>

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						<p>1. The Council needs to ensure that the Plan meets the full objectively assessed needs for the full plan period i.e. up to 2038 at least;</p> <p>2. Further allocations are needed to ensure Point 1 above is met;</p> <p>3. Further allocations are needed in any event to enable the Council to demonstrate a 5-year housing land supply at the point of adoption and then to maintain a rolling 5-year housing land supply thereafter;</p> <p>4. The Green Belt Stage 3 study needs revisiting again to address the deficiencies identified in Section 4 of these Representations and also within the Technical Note prepared by Liz Lake Associates;</p> <p>5. Neither The Five Oak Green Bypass nor The Colts Hill Bypass are currently sound. Should the Council continue to wish to include these two components of transport infrastructure the deficiencies identified in Section 4 of these Representations and the Technical Note prepared by Velocity Transport Planning need to be addressed; and,</p> <p>6. Based on these Representations Rydon Homes' promotion site at Five Oak Green</p>	<ul style="list-style-type: none"> • Viability- Concern TWBC does not know whether this is a viable project. The bypass was conceived to be part of the development strategy for Tudeley Village, now deleted. Therefore viability of project uncertain and not addressed in TWBC evidence base • TWBC modelling (undertaken by SWECO) - demonstrates, while congestion will be experienced along B2107 Five Oak Green Road as a result of development numbers in the Plan (as modified) it is not at a level that would justify the delivery of the bypass • Therefore proposed bypass no longer has any credibility and should be deleted <p><u>Colts Hill Bypass:</u></p> <ul style="list-style-type: none"> • Feasibility - delivering bypass extremely difficult to achieve given land required and multiple landowners • TWBC still not in a position to confirm financial viability of the scheme • TWBC modelling (undertaken by SWECO) - the traffic generation estimates over estimate the amount of traffic and consequently the cost benefit analysis could be based on inaccurate information, leading to a funding gap (again viability questionable) • SWECO modelling also demonstrates that capacity issues at the A228/B2017 could be addressed via local mitigation at the roundabout junction and therefore the bypass is not required • Evidence base relating to the both bypass components still contains fundamental gaps and apparent that neither are necessary to meet the needs arising from the revised development strategy - therefore unsound <p>Solution: The above points and issues raised in the Technical Note prepared by Velocity Transport Planning (Appendix 2) submitted with the representation need to be addressed.</p>	<p>of the extensive transport modelling that has been undertaken. This is outlined in work undertaken by Sweco (PS 047, PS 048, and PS 049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in junctions or routing etc will be considered at the time.</p> <p>Part of that package of mitigation is the Colts Hill Bypass has been reviewed through a series of studies to assess the feasibility of the bypass. including a Landscape and Visual RAG Assessment, and Green Belt harm assessment (PS 050, PS 051, PS 052).</p>

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						represents an ideal opportunity for allocation in the Plan that will deliver sustainable growth and tangible planning benefits to the wider community in line with the Council's strategic policy objectives.		
176-2	Andrew Winser	Bassetts Farm Forum			Appendix A: List of Post Submission Evidence Base Documents		<p>PS_062 shows a change in the development trajectory compared to the previous version of the Local Plan Housing Trajectory (February 2021). This means the Infrastructure Delivery Plan (October 2021) is out of date for Horsmonden.</p> <p>Concerned with the provision of health services and primary education as they are already at capacity with no clarity of how the increase in population will be handled. Also concerned with the traffic, sewage, water mains and electricity infrastructure. Traffic is a critical safety issue which will be exacerbated by the allocations. Sewers near AL/HO3 currently overflow.</p> <p>Infrastructure must be delivered before any new housing can be occupied. A clear and committed set of infrastructure improvements is essential and required by para 35 of the NPPF 2023.</p>	<p>Whilst this is considered to be outside the scope of this consultation, it is noted that the site AL/HO 3: Land to the east of Horsmonden was discussed at the previous hearing session on Matter 7, Issues 13 Residential Site Allocations at Horsmonden held on 5 July 2022.</p> <p>It is considered that any necessary changes to this site allocation policy can be considered and dealt with through the 'Main Modifications' process.</p> <p>The Council notes that there is a current planning application pending consideration relating to the majority of this site area. It is planning reference 24/00078/Hybrid - Full application for the erection of 120 No. dwellings (Use Class C3), including affordable housing, landscaping, public open space, allotments, ecological enhancements, SUDs and access. Outline application (with all matters reserved) for 0.25 hectares of land for a new Medical Centre (Use Class E(e)) with associated access, parking and landscaping.</p>