

BMPC response to Tunbridge Wells Borough Local Plan (2020 – 2038)

New Evidence Base Documents Consultation

Comments relating to the Transport aspects of the following documents:

PS095; PS099 and the links within it; PS100; PS101; PS102; PS103; PS104; PS105; PS106a,b,c,d.

Brenchley and Matfield Parish Council (**BMPC** or the **PC**) considers this suite of documents relating to transport and highways unsound because of the apparent inconsistencies between some of the documents, the lack of clear funding and delayed timing for mitigation measures and highway improvements, and the unrealistic assumptions made about modal shift in relation to traffic through the parish.

1. Introduction

BMPC is concerned that the proposed developments to the north and east of the parish will significantly increase the traffic flow through the parish, predominantly via the B2160 that runs through Matfield between Paddock Wood and the A21 at Kippings Cross. In fact, Speed Indicator Device (SIDS) data collected by the parish demonstrate an average increase of approx 5% in traffic movements through the parish in the last 18 months (equivalent to 3% per annum increase). This is without the increases in traffic to be generated from the proposed developments set out in the emerging Local Plan.

The PC is worried about the potential health and safety impact on the residents of the parish from increased traffic flows, as our SIDS data shows that between 8% -14% of cars passing through Matfield over the last 18 months were speeding. We have engaged with KCC Highways and through our HIP to address and mitigate health and safety risks to our residents from the existing traffic flows along the B2160 in the village, and nothing has been forthcoming from KCC.

Out of the 8 identified major traffic hotspots in the Borough for the LPMS scenario in **PS103 Sweco Strategic Transport Assessment – Modelling Appraisal April 2024 (STA April 2024)** Table 12), 3 directly impact the parish:

ID	Junction Name
14	A228 Alders Road/Crittenden Road
35	A21/B2160 Maidstone Road (Kippings Cross)
107	B2160 Chestnut Lane/Brenchley Road (Matfield Crossroads)

The STA April 2024 **PS103** concludes (section 6.2) that these major hotspots would be mitigated by a number of changes including

- Colts Hill Bypass and associated Badsell Road roundabout improvements and

- Pembury Road corridor improvements

The Colts Hill bypass is critical in the assumptions to mitigate traffic flows through our parish, and even if this is built, we consider that traffic arising from the developments to the east of Paddock Wood (nearly 1,400 out of 2,633 new dwellings) will naturally use Pixot Hill or Gedges Hill to access Brenchley and Matfield and the A21 rather than divert to the A228. The abandonment of the Mascalls Crossroads (discussed below in 5.2) improvements will also incentivise the traffic from these developments to access the A21 via the villages rather than the A228.

PS105 (TWBC Infrastructure Delivery Plan August 2024) makes one mention in its 187 pages of the Colts Hill bypass (3.21), but does not include any costing, funding sources or timing for the provision of it. There is provision, and costing, for improvements to the Badsell Road roundabout, but there appears to be nothing about the bypass itself. The word “bypass” is used only 4 times in this document, predominantly in the context of improvements to the Badsell Road roundabout.

In the absence of the Colts Hill bypass in **PS105** we share the conclusions set out in 6.2 of the STA April 2024 report that there will be a “significant [traffic] impact at locations throughout the Borough”. With 3 out of 8 major traffic hotspots in the Borough impacting our parish, the primary mitigation for traffic growth in Brenchley and Matfield is the Colts Hill bypass. Residents in Brenchley and Matfield will be disproportionately negatively impacted if the bypass is delayed or not built.

Set out in the following paragraphs is our analysis of the provisions set out in the documents dealing with the major hotspots in our parish, questions we have in respect to those proposals and some inconsistencies we note in those documents and the underlying assumptions. We also examine the proposed mitigations to the expected traffic growth in our parish and ask a number of questions about their implementation and the impact if they are deferred or never constructed.

2. Hotspot Junction 14 Alders Road/Crittenden Road

In STA April 2024 section 4.3.2, the report states that J14 “is close to the southern end of the Colts Hill bypass. It is anticipated that the emerging design for the bypass will re-configure this junction therefore no additional mitigation has been considered as part of this study”. Yet no provision for this junction appears to be included in **PS105**, nor are any contributions from developers set out in the various **PS106** viability appendices (yet there is provision for the Badsell roundabout improvements).

2.1 If no contributions are expected from the Paddock Wood developers, who will fund the improvements to this junction and who will pay for them? (Tunbridge Wells Borough Council (TWBC) and/or Kent County Council(KCC)?)

2.2 In the event that the Badsell roundabout improvements are made, increasing traffic on the A228, but the bypass is delayed, what mitigations are being considered for this junction? At what cost and who will bear these costs?

3. Hotspot Junction 35 Maidstone Road/A21 “Kippings Cross”

PS095 does not mention any improvements at Kippings Cross. In **PS104** section 5.7.3 Table 20, Sweco states that 11 possible mitigations for the roundabout were considered, but only 2 were deemed worthy of taking forward (KX10 and KX11 – modified roundabout layout and full signalisation, respectively). Section 5.8 states that at a meeting on 8 February 2024 between Sweco, TWBC, KCC and National Highways (NH) the potential improvements at Kippings Cross were discussed and the conclusion was that “It was accepted that it will be difficult to deliver a highways plan [at this junction] without significant costs and land take. It was therefore agreed to also consider an alternative strategy”. The alternative strategy was diversion via A228 improvements and improvements to the Pembury Road corridor, and this reflects the line taken by TWBC, KCC and NH at the Stage 3 hearings. Table 21 in Section 5.9 Local Plan Highways Mitigation shows no improvements to Kippings Cross in the latest LPHM2 scenario.

However Table 3 Summary of Transport Needs in **PS105** contains a line for “A21 Kippings Cross/Blue Boys junction improvement, and Appendix 1 of the same document provides for £1.5m of funding for this “Essential/Critical” work to come from developers. In the **PS106** viability studies there is provision for £500,000 from developers for these unknown improvements.

Notwithstanding its conclusions from the meeting on 8 February 2024 (mentioned above), in October 2024 TWBC issued its response to the public consultation on KCC’s Local Transport Plan 5 for Kent. In its response to question 4 (Do you support our new draft Local Transport Plan), TWBC answered that it partly supported the plan including:

- “Key highway improvements to support our Local Plan (A21 Kippings Cross and A228/264)”

No specific improvements to the Kippings Cross junction are set out in the draft Local Plan and of the 11 options considered by TWBC to improve congestion at this junction, only two were considered possible to take forward, but both were dismissed on cost grounds, leading to the decision to follow the strategy of improving the A228 corridor from the Badsell Roundabout to Tunbridge Wells.

3.1 Are there going to be any Kippings Cross improvements or not? Section 5.13 shows Kippings Cross as a collision hotspot so what improvements are to be made to address this?

3.2 If there are, why is £1.5m set aside for these improvements in **PS105** and only £500k contributions from developers assumed? Who will fund the balance of the cost of the improvements?

4. Hotspot Junction 107 B2160 Chestnut Lane/Brenchley Road “Matfield Crossroads” (locally known as the Standings Cross, or more recently, The Poet Crossroads)

As for Kippings Cross, the only mitigation for traffic hotspot 107 is the assumption that traffic will be diverted to the A228 Colts Hill/Pembury Road Corridor improvements (section 4.3.2 of **PS103** STA April 2024).

Whilst it is assumed in the models that the A228 improvements will draw traffic away from the B2160, there is little modelling on the impact of the increased traffic on the east/west Brenchley Road/Chestnut Lane roads resulting from developments to the east of the parish and in the future to the east of Paddock Wood (accessing Brenchley Road via Pixot Hill). As well as using a hazardous crossroads where there is very poor visibility, this route is already regularly severely congested owing to parked cars. It passes by Brenchley and Matfield Primary school (and Brenchley Pre-School), where children and parents have to cross the road between the parking areas and the school without the benefit of street lighting, a 20mph limit or a formal pedestrian crossing.

4.1 In the event that the Badsell roundabout improvements are made, increasing traffic on the A228, but the bypass is delayed, what mitigations are being considered for junction 107 and the roads leading to it? At what cost and who will bear these costs?

4.2 We are concerned about the impact of the increase in traffic along the B2160 on the health and safety of Brenchley and Matfield residents. If the Colts Hill bypass is delayed or not built, we believe there should in particular be provision for safe pedestrian road crossings along the B2160 and outside the primary school to counter the effects of increased traffic and increased number of speeding vehicles. Who would implement and pay for these mitigations?

5. Mitigations to traffic growth in Brenchley & Matfield

5.1 A228 Colts Hill Bypass

PS095 revised policy wording for Policy STR/SS1 includes:

“15. The infrastructure to be funded shall include but may not be limited to:

(e) the improvement of the highway network including the Colts Hill Bypass”

and

“16. The supporting infrastructure listed below shall be delivered in accordance with the following delivery parameters, unless otherwise agreed in writing with the Local Planning Authority,” with the table below it showing in the medium phase, at a cumulative total of circa 1650 homes, “Financial contributions to facilitate Colts Hill Improvements work (once CPO and planning application complete with existing contributions held by KCC)”.

However, **PS105** TWBC Final Infrastructure Delivery Plan (**IDP**) (August 2024) table 3 does not appear to include the bypass. Though it includes an improvement to the Colts Hill bypass/Badsell Road roundabout. A figure for the roundabout of £11.745m is shown in the **PS105** Appendix 1 table, consisting of £10.245m to come from developments at Paddock Wood under the emerging Local Plan, together with S. 106 funds of £1.5m already received from developers in Paddock Wood by KCC.

PS103 STA April 2024 concluded that the Colts Hill Bypass would be required by 2029 as the road is already over capacity in the PM peak, and “becoming overcapacity in the AM peak by 2028” (section 5.12). Two months later in **PS104** (section 4) Sweco states

that this was a “high-level assessment which considered when Badsell roundabout is forecast to become over capacity in both peaks...”. The report goes on to state that “following the publication of the STA, and further discussions between Sweco, Stantec and TWBC, further information was requested...”. So having stated in April 2024 that the road was already congested in the PM peak and would get to overcapacity in the AM peak by 2028, two months later the conclusion is that the road will be at capacity by 2031 and meet the hot spot criteria then. BMPC is not a traffic expert but for TWBC and its consultants to make these significant changes in the dates when the road reaches overcapacity within two months is both surprising and largely unexplained in layman’s terms.

The draft KCC Local Transport Plan 5 for Kent identifies the A228 corridor between West Malling and Tunbridge Wells as a local network that needs improvement “due to site specific pressures”. It concludes that this work “should include a **further review** [our emphasis] of the Case for a Colts Hill Bypass”.

5.1.1 It may be that this apparent omission of the Colts Hill bypass from the IDP is merely a drafting error and that the quoted figures are meant to be for the bypass and the Alders Road junction as well as for the Badsell Road roundabout, but if so this should be more clearly shown.

5.1.2 No funding is shown for the implicit improvement of J107 at the southern end of the proposed Colts Hill Bypass – why not?

5.1.3 Timing. In April 2024 the A228 was stated as being already overcapacity in the PM peak and would be overcapacity in the AM peak by 2028 meaning a requirement for the bypass by 2029. Two months later this was pushed back, for both morning and afternoon peaks, to 2031. Such a significant change in data points calls into question the initial analysis and we would like further details to show how the conclusions changed so significantly delaying the bypass requirement. What is to protect us from the bypass being deferred again? Without this mitigation at an early date what do TWBC/KCC/NH propose to deal with the increased traffic in Brenchley & Matfield?

5.2 B2160 Junction at Mascalls Court Road/Badsell Road (Mascalls Crossroads)

As part of the consideration for the development at Mascalls Farm (413 dwellings), it was proposed that the Badsell Road be locally realigned to change the current staggered priority junction into a traffic signal-controlled crossroad, together with pedestrian crossing facilities (the site is adjacent to Mascalls School). The purpose of this infrastructure improvement was to ease the increased congestion along the Mascalls Court Road by removing the staggered nature of the junction, which makes egress onto the B2160 difficult and can cause significant congestion along the road in the morning and evening peaks (school drop-off and pick-up). This would ease access to the Badsell Roundabout and A228 corridor.

Developers made s106 contributions in the form of cash and land to accommodate this infrastructure improvement to deal with increased traffic flow from the Mascalls Farm development towards the B2017 and Badsell Roundabout/A228. Traffic modelling for

the large proposed developments to the east of Paddock Wood (applications 23/00086/HYBRID and 23/00118/HYBRID, together the **Queen Street Applications**) were based on the improvements to the Mascalls crossroads to help to accommodate traffic generated from the 1,400 dwellings proposed to be built on these strategic sites.

On October 14, 2024 KCC Highways reported to the Tunbridge Wells Joint Transportation Board (the TWJTB) that extensive flood modelling undertaken by KCC designers had concluded that this junction improvement could not be implemented. KCC Highways concluded that it was unable to provide a design that would provide sufficient flood mitigation that would satisfy the Environment Agency or KCC (as lead flood authority), and therefore any planning application for the current scheme would not be successful. The revised approach is to expand the Badsell Road junction at the B2017 (using Highways and s106 land) but the staggered junction arrangement with Mascalls Court Road will remain. It appears that there will therefore be no mitigation for vehicular traffic travelling west along Mascalls Court Road towards the Badsell Roundabout/A228.

KCC's strategy for 2002-26 (Framing Kent's Future) contained a commitment (Priority 2 –“Infrastructure for Communities”) for an “Infrastructure First” approach to necessary development. In fact KCC stated that “We firmly believe that meeting nationally set housing targets, without the correct infrastructure, is not right nor acceptable for Kent”.

5.2.1 If it is not acceptable for development to take place without correct infrastructure for Kent, then why is it considered acceptable for the residents of Paddock Wood and Brenchley & Matfield? If KCC sets out its policy to Kent residents that it will be Infrastructure First, why had it not made a planning application for the Mascalls Crossroads when planning permission for the Mascalls Farm development was granted in 2021? The KCC councillor for our area made the suggestion at the TWJTB that s106 contributions be sought from other future developments to provide increased funding to find a solution for the Mascalls Crossroads. However helpful this contribution may be, it does not give residents the comfort that KCC is fully behind its Infrastructure First policy. Nor is it likely to generate sufficient funds to offset the flood risks at the site.

5.2.2 BMPC expressed concerns in its response to the Queen Street Applications, questioning the conclusion that just 4.1% of the modelled traffic from the Queen Street Application developments would head up Pixot Hill towards Brenchley and Matfield, and 25.9% via the B2160 to Matfield. Without the Mascalls Crossroads improvements, and without any timeframe in the IDP for the delivery of the Badsell Roundabout (KCC Highways Colts Hill bypass), we would expect significantly higher traffic flows through the villages, and reiterate our regret that “no mitigation measures were proposed to slow traffic or provide safe road crossing facilities for pedestrians on the B2160 or Brenchley High Street or Brenchley Road”. The risks from increased traffic levels and increased in speeding vehicles in the villages will pose health risks to our residents, increased emissions and a degradation of the infrastructure available to existing residents of the parish.

5.3 Pembury Road Corridor Improvements

The modelling assumes that improvement to 5 junctions along the Pembury Road corridor will improve capacity of this route by 10%, and is critical for the conclusions by TWBC/KCC and NH that no improvements are required for mitigation at hotspot Junctions 14, 35 and 107. This is set out explicitly in **PS103** STA Modelling Appraisal April 2024 in section 4.3.2 where it states that “capacity improvements on the A228 Pembury Road corridor, including the dumbbell roundabouts, will have the potential to divert traffic away from the B2160 and mitigate from the Local Plan impact at” Kippings Cross and Matfield Crossroads.

However, **PS104** Addendum analyses the impact of 4 of these junctions but excludes any improvement to the north-west roundabout of the dumbbell roundabouts on either side of the A21. We also understand that there are concerns that the proposed improvements to two of the four junctions along the corridor, could be problematic:

- A264/A21 southern dumbbell. The improvement as put forward may not be delivered as it may fail to meet road safety requirements for road junctions, and;
- A264/Blackhurst Lane junction would presumably require Compulsory Purchase Orders on land owned by Southern Water.

Traffic wishing to go to Tunbridge Wells from Paddock Wood can access all the Pembury Road improvements to the south of the A21 by using the B2160 and A21. If there is any delay to the Badsell Road or Colts Hill bypass there will be no incentive for drivers to use the A228 to access Tunbridge Wells and no mitigation.

In any case, much of the additional traffic heading to the A21 via Kippings Cross from the proposed developments in Paddock Wood will be heading south along the A21 or north towards Tonbridge, Sevenoaks, London, the airports and the M25, and therefore the proposed Pembury Road corridor improvements will have no effect whatsoever on that traffic.

5.3.1 How can modelled traffic capacity along the Pembury Road Corridor be improved by 10% when there are concerns that improvements planned for 2 of the 5 junctions will be problematic to deliver in a timely fashion?

5.3.2 The Pembury Road Corridor improvements to Tunbridge Wells can be accessed via the B2160 and Kippings Cross/A21 avoiding congestion at the unimproved roundabout. We do not consider that this will be sufficient mitigation to conclude that no improvements need to be made at Kippings Cross and along the B2160 in Matfield.

5.3.3 Timing and costs– when are the improvement works along the corridor going to start? The **PS106** Viability assessments show that Paddock Wood developers are going to contribute 63% of the assumed cost of £6m for these improvements. Is there any provision for cost over-runs (given the inflation in the construction sector in recent years) and who will bear those increased costs? Are the developers limited to 63% of the £6m cost assumed, or 63% of the actual costs of the improvements?

5.4 Modal Shift

5.4.1 Buses

Appendix 1 to PS105 (p 125/6) shows bus network enhancements for improvements between RTW/Paddock Wood/Pembury/ Tonbridge, with a moderate risk, medium timing, cost to be confirmed and funding to be by developers/commercial services. This does not give confidence that sufficient funding will be available or that the service will be provided soon enough to influence travel choices. The problems at Kippings Cross exist now and the attached data at Appendix 1 from BMPC's speed indicator device (SID) on the B2160 suggest that traffic on the B2160 is already growing at approximately 3% pa due to previously permitted development at Paddock Wood and Horsmonden. In 2021 KCC submitted its bus service improvement plan with a funding requirement of £213m over a 3 year period - of which it was only allocated £35m. With KCC looking at an £80m budget deficit in 2025-26 and a predicted deficit of £144m in 2026-27, the prospects of its being able to subsidise these new routes are minimal.

Therefore the extent to which bus services will encourage modal shift away from the B2160 appears very uncertain.

The proposal in **PS100** Modal Shift Analysis Technical note for a service every 15 minutes between Paddock Wood, Pembury and Royal Tunbridge Wells would be welcome, provided it does not involve any reduction in the service to bus stops in Matfield. BMPC notes with some concern that **PS100** does not specify the route to be taken by the revised service, and that it suggests the increased frequency offers the opportunity to provide express 'limited stop' services between Paddock Wood and Royal Tunbridge Wells, which would presumably mean that some of the buses would not stop at the bus stops in Matfield.

5.4.2 Walking and Cycling

Paragraph 3.68 of **PS105** IDP states that a "Pedestrian/cycle route from Paddock Wood to Tunbridge Wells adjacent to the proposed part online/part offline A228" will be provided. Such a route is most unlikely to persuade people to walk who would otherwise use a car. It is too long for walking other than as a longer-distance recreational route.

The documents suggest that the pedestrian/cycle route will be alongside the A228 for much of its length, and it was suggested by TWBC at the Stage 3 hearings that it could take the form of a segregated route alongside the proposed section of Colts Hill bypass and then use minor lanes. The map at Figure 3 in **PS100** shows the proposed route. Assuming the new segregated route would end with the bypass at the Alders Lane junction, the cycle route would then need to use the carriageway of the remaining, narrow, very heavily trafficked part of the A228, where HGVs have to slow to a walking pace to pass each other and there is certainly no additional room for cyclists, to connect to Redwings Lane further south, unless agreement can be reached with relevant landowners for a new behind-the-hedge path. From the narrow, partly sunken Redwings Lane, which would not be a particularly safe route for cyclists, it would cross the bridleway bridge to enter a public footpath through woodland owned by TWBC, where an upgrade to a cycle route or bridleway could presumably be dedicated by the Council. Given the volume of traffic on the A228, only an entirely segregated route is likely to be sufficiently attractive or safe to persuade people to cycle rather than using a car. To provide an entirely segregated route would require either compulsory purchase

of the necessary land, which TWBC and KCC seem unwilling to contemplate, or landowner agreement, which may well not be forthcoming. Either of these is likely to cost a great deal more than the £1.2 million indicated in the IDP.

Unless a fully segregated route can be provided, it seems very unlikely that the proposed pedestrian and cycle route between Paddock Wood and Tunbridge Wells will achieve any measurable modal shift. Therefore this should be removed from the modelling assessments for the junctions in Brenchley and Matfield.

5.5 Highway Improvement Plan (HIP)

It was suggested by KCC and TWBC officers at the Stage 3 hearings that under the “Monitor and manage” approach, if monitoring demonstrated that, contrary to the SWECO modelling, congestion at the hotspots in Brenchley and Matfield parish was increasing substantially or that the effect on road safety was severe, then this could be addressed through the HIP. BMPC has in fact already established, through extensive discussion of its HIP with KCC, that the only traffic calming measures in Matfield village that KCC is willing to permit on the B2160, are the mobile Speed Indicator Devices that the BMPC has already funded and installed and which are proving to have only a marginal effect on speeding traffic (they are advisory only) and some enhanced road markings on the entrance to the 30mph limit at the southern end of the village which are to be funded by the development AL/BM2. The discussions with KCC have also already established that for various reasons the B2160 through Matfield village will not qualify for the installation of safe crossing facilities for pedestrians such as a pedestrian refuge island or zebra crossing. Therefore the HIP would not be capable of providing a solution.

6. High Weald National Landscape - Rural Lanes

Brenchley and Matfield lie within the High Weald National Landscape (HWNL). In March 2024 the HWNL Joint Advisory Committee (which includes all 15 local authorities covering the area) approved the High Weald AONB 2024-2029 Management Plan for adoption by each of the Local Authorities. Following a formal public consultation process, the Management Plan [AONB Management Plan - High Weald National Landscape](#) was adopted by TWBC on 20 June 2024.

Included in the HWAONB Management Plan is a section on Routeways within the HWNL and there is an obligation in section (d.) for local authorities to “ensure that there is reference to the AONB Management Plan in Local Transport Plans (LTPs) and ensure its use to inform highways work and to support funding bids”. There is no mention of this plan in the draft KCC LTP 5.

Objective R1 in the HWAONB Management Plan is:

“To maintain the historic pattern, morphology and features of routeways”. The purpose of this policy is to maintain the network “that has a symbiotic relationship with settlement location, hinterlands and identity, and is a rare UK survival of an essentially medieval landscape; to protect the individual archaeological features of historic routeways such as sunken lanes...”

Objective R2 is to:

“Protect and enhance the ecological function of routeways” to protect and improve the condition of the complex small-scale habitats along routeways. This is to protect the historic roadside character from erosion from motor vehicles.

The existing traffic congestion at Kippings Cross at peak times and on Summer and holiday weekends is already leading to unacceptable volumes of traffic diverting onto historic routeways in the HWNL in Brenchley and Matfield and adjoining parishes, the conservation of whose character and ecology are objectives R1 and R2 of the HWAONB Management Plan adopted by TWBC and KCC. This will lead to increased damage and erosion to the lanes also identified in the TWBC Rural Lanes SPD within the HWNL.

If no Kippings Cross improvements are included in the plan (as currently assumed) and the Colts Hill bypass is delayed or not built (this is the main proposed mitigation and alleged justification for doing nothing at Kipping Cross) then these pressures on the historic rural lanes will increase significantly. Traffic generated from the Queen Street developments to the east of Paddock Wood (parcels C and D), for which hybrid applications have already been submitted, without the Mascalls Crossroads improvement (and without the Colts Hill bypass) will put further pressure on rural lanes in the parish.

The effects on these lanes and on the villages of Matfield and Brenchley and the Standings Cross junction will be severe if the improvements at Kippings Cross and the A228 Colts Hill are not constructed in the short term. The “Monitor and manage” approach should not be applicable, since by the time monitoring has established that vehicular traffic has increased substantially over its already unacceptable levels, the damage will have been done to the historic routeways.

On 26th December 2023, a new statutory duty under Section 245 of the [Levelling-up and Regeneration Act 2023](#) came into force in all National Landscapes ([formerly known as AONBs](#)). The new duty requires all relevant authorities to ‘seek to further’ the purpose of conserving and enhancing natural beauty of any landscape with AONB designation. This new legislation applies to all public and statutory bodies, and it applies to all their decisions.

BMPC is of the opinion that in this suite of documents TWBC and KCC are failing to fulfil their obligations under the Levelling Up and Regeneration Act and the HWAONB Management Plan to seek to conserve and enhance historic rural lanes in the Borough.

7. Conclusion

We note the KCC Infrastructure First commitment (“an infrastructure first approach is critical before further housing growth”) but given KCC’s history of not doing so (for example the Mascalls Crossroads improvements, and the fact that it has done nothing, and plans to do nothing, to improve the Badsell Roundabout until the Colts Hill roundabout is commissioned), we anticipate that the Inspector will be as sceptical of this KCC “commitment” as we are.

Nevertheless, the NPPF sets out the tests to establish the soundness of a Local Plan that will have to be considered by the Inspector. BMPC’s main concern with the New

Evidence Base documents is that they do not meet the soundness tests with relation to infrastructure, notably:

Achieving Sustainable Development – where there is an obligation to provide “supporting infrastructure in a sustainable manner” and

Economic Objective – which includes an obligation to the identification and co-ordinating the provision of infrastructure

We find that the local authorities and their consultants are capable of identifying the infrastructure needed to support the housing and economic developments set out the Local Plan, but we find they are lacking in their ability to actually set out how that infrastructure is delivered or co-ordinated, as the examples in this paper demonstrate.

We also note that under 16 (d) of the NPPF Local Plans should

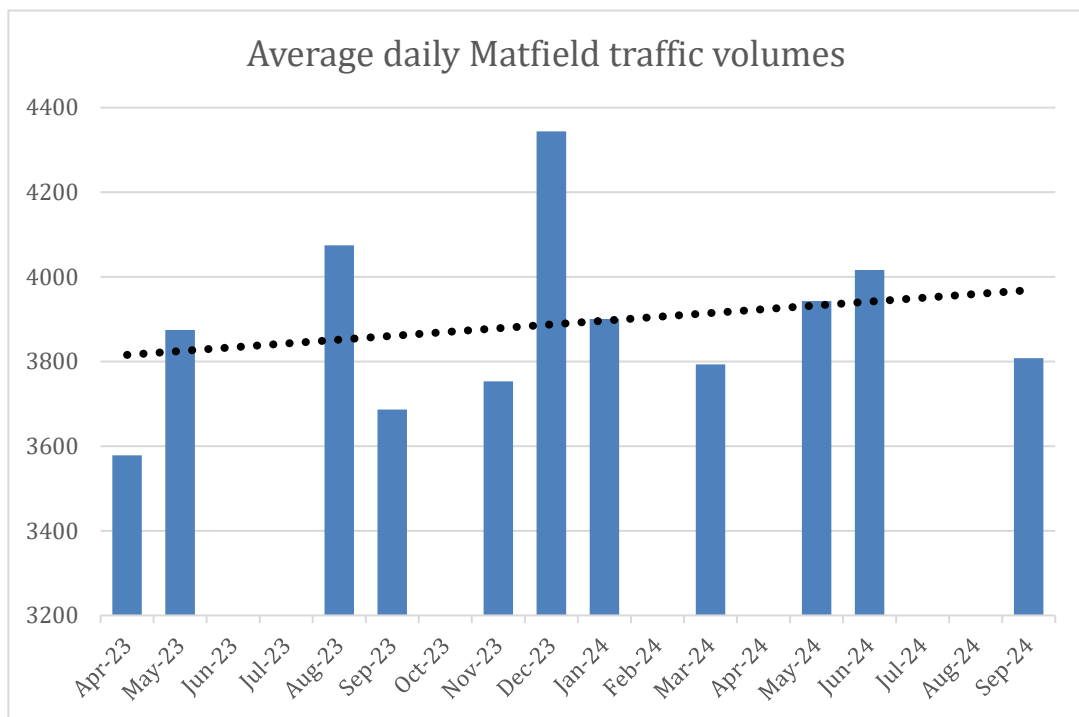
“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”

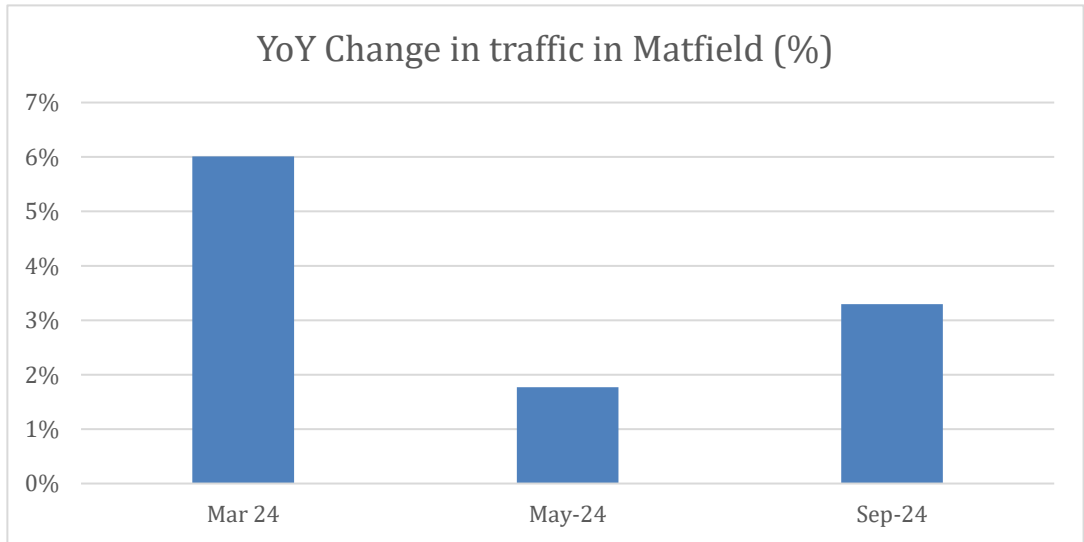
Whilst the draft Plan relies on the Colts Hill bypass/Pembury Road corridor improvements as the only mitigation for increased traffic, congestion and health risks to the residents of the parish, we find that there is the absence of a clearly written and unambiguous plan for that Colts Hill bypass in PS105 IDP. In the KCC draft Transport Plan 5 for the A228 corridor, KCC states that there should be a “further review of the case for a Colts Hill bypass”. This creates ambiguity as the bypass is identified in the Plan as being the chief mitigation for the 3 traffic hotspot junctions impacting Brenchley and Matfield. TWBC consultants have provided a series of analyses that show the bypass will be required by 2029 or 2031 at the latest. We would urge the Inspector to require TWBC to be clear and specific over the provision of this road and to require the prompt provision of improvements to the Kippings Cross roundabout and the Standings Cross junction.

In order to pass the NPPF soundness test of being positively prepared, the Plan should provide a strategy which, at a minimum, seeks to meet the areas objectively assessed needs. BMPC considers that whilst the requirements may have been identified, we do not consider that the Plan, as drafted, sets out a strategy and timescale to deliver the Colts Hill bypass, on which it is so reliant. Without such a timetable we do not consider that the Plan, as drafted, will meet the soundness test for being deliverable nor the test with respect to sustainability. Nor does BMPC consider the Plan justified, because it fails to put forward an appropriate strategy in the respects we have highlighted concerning Kippings Cross and the B2160. It is also not consistent with the statutory duty to *seek to further* the purpose of conserving and enhancing natural beauty, as regards the historic AONB routeways in Brenchley and Matfield parish.

Appendix 1

Brenchley & Matfield SIDS Data





	OK	Speeders	Total	YoY Change	
Apr-23	3090	488	3578	13.63382306	
May-23	3379	496	3874	12.79451348	
Aug-23	3626	448	4075	11.00515374	
Sep-23	3273	414	3686	11.21875606	
Nov-23	3445	308	3753	8.218187355	
Dec-23	3967	377	4344	8.672345184	
Jan-24	3580	321	3900	8.226202249	
Mar-24	3497	296	3793	7.807027455	Mar 24
May-24	3614	329	3943	8.353461185	May-24
Jun-24	3669	348	4017	8.652352781	Sep-24
Sep-24	3470	338	3808	8.878773479	

BMPC response to Tunbridge Wells Borough Local Plan (2020 – 2038)

New Evidence Base Documents Consultation

PS105 Infrastructure Delivery Plan August 2024, paragraph 3.106, on pages 59 and 60, and Appendix 1, page 151, Horsmonden, Health.

Brenchley and Matfield Parish Council (BMPC) considers that the proposal to move the Howell surgery in Brenchley to the new site for which land is to be safeguarded in Horsmonden is not justified. Not only would it disadvantage Brenchley residents, many of whom can currently walk to the surgery, but BMPC also understands from a meeting of the Patient Participation Group (PPG) this year that Howell surgery has neither the funding nor the intention to build a new surgery. The PPG was informed that even with the new Bassets Farm development (AL/HO3), Howell surgery have ample staffing and funding for both existing surgery sites to continue as they are, with the Horsmonden surgery being open on more afternoons.