


Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Document(s) commented on	Proposed Modifications	Comment Summary	TWBC Response	Hearing Session Participation (and reason for participation)
NEBD5-1	Cllr Don Kent				Not stated	[This is also in table 4) Flooding and Flood Risk and 8) Housing Needs and Supply] Both Hotspots along Badsell road need addressing first before housing. 2nd the flow of water from Matfield and Pembury need to be addressed first before anymore housing. Any housing within the Badsell road which obtains 106 money must come to Paddock Wood. The need for the Colts Hill bypass must also be addressed this time before anymore housing as it's been promised before and then been removed of any scheduling of highway improvements.	Legally non-compliant and unsound Both ends of Badsell Road have hot spots which, as stated by KCC, cannot be addressed due to cost and the need for a CPO to accommodate a new roundabout. Badsell / Maidstone Road junction has a major issue of an under river flowing beneath the surface and a culvert so the straightening of this road cannot go ahead as stated by KCC. Road improvements are a must for the proposals to put 562 houses in the middle of Badsell Road, which KCC have said they cannot do.	Section 4 of The Strategic Transport Assessment Addendum (PS_104) has identified that the Badsell Roundabout improvements will be required alongside the delivery of the Colts Hill Bypass as the two schemes are intrinsically linked. Both these schemes are included in the Infrastructure Delivery Plan (PS_105). An alternative layout is currently being developed by KCC at the Badsell / Maidstone Road junction.	Yes, I wish to participate at the examination hearing session - so I can address the issues that may be brought up, plus I have a right to be heard
NEBD9-3 to 9-5		Redrow and Persimmon	Judith Ashton	Judith Ashton Associates	PS_100, PS_101, PS_104		Legal compliance and soundness not stated PS_100 – this report is supported given the interventions proposed by the PWeC developments through embedded infrastructure, new and enhanced bus service provision and measures set out in the LCWIP. Figure 7 reinforces the geographical link between the measures proposed and the modal shift that can be achieved. PS_101 – the assessments and conclusions of this work are fully supported in focussing upgrade works on the A264 corridor, as opposed to the Kipping's Cross junction. It is apparent at all junction locations that there is land available within the highway boundary to deliver these, or an evolution of these, schemes. PS_104 – it should be more explicit that this report supersedes section 5.11 of the PS_103 report. The conclusion that the Colts Hill Bypass and the Badsell Roundabout scheme would be required by 2031 is acknowledged.	This is noted.	Not stated
NEBD10-1	Peter Bruce					The A228 Pembury Road is a constant source of traffic problems and I note there are further mitigations planned. One thing that would make a significant difference and solve other issues too, at low cost, is to make the A21 Pembury	Legal compliance and soundness not stated The suggestion in the column to the left would have a number of benefits: <ul style="list-style-type: none"> Traffic heading north from Pembury could enter the A21, avoiding the peak time queues to cross the A228-Tonbridge Road junction 	Whilst there may be existing issues at this location, the analysis has focussed on mitigating the Local Plan impact. This location was not identified as requiring mitigation because of the Local Plan impact.	Not stated

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						<p>South junction traffic light controlled or possibly a roundabout created.</p> <p>My crudely drawn suggestion for traffic lights and a northbound option at the Pembury south A21 junction</p> 	<ul style="list-style-type: none">• Eliminates the crossing manoeuvre to enter Pembury from the A21 at the Pembury South Junction, where two fatalities have occurred.• Traffic going north on Tonbridge Road would no longer be stuck behind traffic waiting to turn west onto the A228, which is bottlenecked by traffic heading towards Tunbridge Wells at peak times.• Traffic lights would reduce the tendency for southbound A21 traffic to race for position at the Kippings Cross roundabout.		
NEBD12-1	Mr Benjamin Roome				PS_103	<p>That the plan ensure the council consider pedestrian safety measures given the increased use of Junction 72 - a Major Hotspot - for southbound traffic. This could be as simple as narrowing and ensuring a right hand turn into the B2169 at Junction 72 tfor southbound traffic, as is already the case - but as a right hand turn - for northbound traffic joining the A267 from the B2169.</p>	<p>Legally compliant but unsound</p> <p>4.3.2 - Junction 72: A267 / B2169 Birling Road</p> <ul style="list-style-type: none">• Junction 72 is a major hotspot and extremely dangerous for southbound traffic, which can avoid a speed camera and accelerate dangerously on a residential road near a children's nursery.• The anticipated increase in traffic flow due to the Local Plan poses a significant risk to the local community, necessitating a detailed risk assessment and feasible mitigations for southbound traffic.• The plan seems to omit references to pedestrian, horse and cycle traffic safety in its considerations, referring only to traffic flows.• Request to fully interrogate why Junction 72 has been recommended only to have a Monitor and Manage approach given its identification as a Major Hotspot.	<p>This junction is included within the Monitor and Manage strategy with a view to implementing an improvement scheme as part of a relevant planning application. It is considered that signalisation will be feasible at this location. Improvements at this junction are also included within the Infrastructure Delivery Plan.</p>	<p>Yes, I wish to participate at the examination hearing session - To fully interrogate why Junction 72 has been recommended only to have a Monitor and Manage approach given its identification as a Major Hotspot.</p>
NEBD13-1	Ms Helen Munro	Pembury PC			PS_101		<p>Legal compliance and soundness not stated</p> <p>Para 4.2 of section 4) Modelling Criteria</p> <ul style="list-style-type: none">• Pembury Parish Council (PPC) is concerned about TWBC's recommendation of Option 2 for the A264 Pembury Road corridor junction capacity assessment.• Option 2 excludes improvements to the Kippings Cross junction, which PPC believes is necessary to manage	<p>The change in traffic flows with the proposed highway mitigation is set out in Chapter 3 of the Strategic Transport Assessment Addendum (PS_104). This demonstrates the improvements along the A228 / Pembury Road corridor will result in an increase in traffic along this corridor and reduction along the B2160. As a result Kippings Cross Junction (Junction 35) falls out of the</p>	<p>No, I do not wish to participate at the examination hearing session</p>

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							<p>increased traffic from large-scale developments.</p> <ul style="list-style-type: none">• PPC doubts the assumption that drivers will re-route from Kippings Cross to the A228 is correct.• Omitting mitigation works at Kippings Cross could worsen traffic congestion and rat-running on rural lanes.	<p>‘major’ hotspot list. Whilst existing issues here may remain, the Local Plan impact will be mitigated.</p>	
NEBD15-5	Louise Goldsmith	Capel Parish Council			PS_099 to PS_104		<p>Legal compliance and soundness not stated</p> <ul style="list-style-type: none">• Capel Parish Council supports Save Capel's concerns, in particular about the impact on the Pembury Corridor junctions specifically at Woodgate Corner and the A21 Dumbbell Roundabouts, deeming proposed mitigations unachievable or <u>seriously</u> unsafe. <i>[TWBC: see NEBD20-3 for Save Capel's representation]</i>• The council questions TWBC's assertion of achieving a 10% modal shift, citing inadequate evidence and lack of sufficient bus and cycle routes from Paddock Wood and Five Oak Green.• Highlighted concerns include no existing mechanism to improve bus services and the dangerous journey along the A228 for cyclists.	<p>The Pembury Road corridor improvements as per Document PS101 are indicative schemes that demonstrate highways improvement schemes for delivering additional capacity within highway boundary land. As is typical, further details with respect to detailed design and a Road Safety Audit would need to be provided at an appropriate time, usually at planning application stage. For the purposes of the current plan-making stage, this level of detail, showing indicative improvements is considered to be appropriate and deliverable.</p> <p>The 10% modal shift target used throughout the Local Plan modelling was based on research presented in Chapter 10.5 of the 2021 Transport Assessment (3.114). It should be noted that the 10% target (actually 9% in the model) has only been applied to total trips to / from the Paddock Wood development. Trips between Paddock Wood and Tonbridge has been reduced by 5% as set out in Table 2 in the Modal Shift Analysis Technical Note (PS_100). Bus service network improvements will be made in order to support modal shift through the development procedures.</p>	Not stated

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NEBD17-4	Adrian Pitts				PS_102 PS_103 PS_104		<p>Unsound, legal compliance not stated PS_102</p> <p>There is no information as to when the tests were done.</p> <p>The queuing lane proposed for the Foal Hurst development is now deemed by KCC to be an unworkable solution. How reliable are these new proposals given the issues with KCC being unable to progress two major junctions in the LP?</p> <p>PS_103</p> <p>3.2 Junction 13 is not able to be mitigation as KCC have stated any meaningful improvement is not possible within the available highway land. 'No further work is being done to progress this' (see the 14 October Joint Transport Board report).</p> <p>Junction 12 and 13 cannot be mitigated effectively so the plan is unsound. They cannot be used for assumptions about other mitigation measures and resultant road use.</p> <p>Modal shift – the report assumes decreases in vehicular traffic on key routes connecting PW with RTW, Pembury and Tonbridge. However, this is based on the impact of mitigation measures which, as already explained, are not set out in the documents.</p> <p>Private companies provide the bus service. There are already resident complaints about reduced services which we have little control over.</p> <p>P19: KCC are yet to design the B2160 junction. Capacity improvements are assumed and no new modelling has been presented to allow for KCC's decisions.</p> <p>5.2.2: the A228 improvements are no longer being taken forward (see the link above) and this capacity review is therefore no longer sound.</p> <p>Para 5.6.1 is no longer sound.</p> <p>How does the Stantec developer scheme sit with the KCC update mentioned above? It is unclear if this is sound.</p> <p>5.10: assumes improvements further along the road, which are now being delayed if not abandoned by KCC</p> <p>5.11: this assumes less traffic flow on account of Colts Hill and Badsell improvements that are not proceeding. Tables 25 and 26 also include</p>	<p>Section 4 of The Strategic Transport Assessment Addendum (PS_104) has identified that the Badsell Roundabout (Junction 13) improvements will be required alongside the delivery of the Colts Hill Bypass as the two schemes are intrinsically linked. Both these schemes are included in the Infrastructure Delivery Plan (PS_105).</p> <p>Junction 12 is the A228 / Maidstone Road (Hop Farm Roundabout) junction. No deliverability issues have been identified at this location.</p> <p>The sustainable transport mitigation measures are set out in the Modal Shift Analysis Technical Note (PS_100)</p>	<p>Yes, I wish to participate at the examination hearing session - The 14 October JTB report for KCC is not widely known about. It needs to be addressed at the hearing.</p>

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							assumptions from these schemes which are no longer proceeding. PS_104 The report states the Badsell Roundabout and Colt’s Hill Bypass are needed by 2029. This is now unsound given the report linked to above.		
NEBD18-2	Ms Chantal Brooks	Brenchley and Matfield PC			PS_099 to PS_104		Unsound, legal compliance not stated BMPC are concerned the proposed developments will significantly increase traffic flow through the parish, predominantly via the B2160 and A21 at Kippings Cross. The PC are concerned about the consequential health and safety impacts on residents. Our data shows 8-14% of cars which pass through Matfield are speeding. We have engaged with KCC Highways who have been unreceptive. The Colts Hill Bypass is critical in the traffic flow assumptions. Even if this is built, we consider traffic from east Paddock Wood developments will Pixot Hill or Gedges Hill to access the A21 rather than divert onto the A228. Comments on the IDP (PS_105) express concern on the delivery of the bypass <i>[TWBC: see comments in table 6]</i> . If this is not built, the STA April 2024 (PS_103) states there will be significant impacts, with 3 of the 8 major traffic hotspots affecting the parish. Hotspot Junction 14 Alders Road/Crittenden Road PS_103 section 4.3.2.: no provision for this junction appears to be included in PS_105 nor any developer contributions set out for it in PS_106. If no contributions are expected from the Paddock Wood developments, who will fund the improvements to this junction? If the Badsell roundabout improvements are made, increasing traffic on the A228, what mitigations are being considered for this junction if the bypass is delayed? Hotspot Junction 35 Maidstone Road / A21 ‘Kippings Cross’ PS_103 section 5.8 explains the approach for Kippings Cross is a diversion via A228 improvements and improvements to the Pembury Road corridor. However, PS_105 states ‘A21 Kippings Cross/Blue Boys junction improvement, and appendix 1 provides £1.5m of funding for this ‘essential/critical’ work. In PS_106 there is £500k	The change in traffic flows through Brenchley and Matfield with the proposed highway mitigation is set out in Chapter 3 of the Strategic Transport Assessment Addendum (PS_104). This demonstrates the improvements along the A228 will result in an increase in traffic along this corridor and reduction along the B2160. The Matfield Crossroads (Junction 107) and Kippings Cross Junction (35) fall out of the ‘major’ hotspot list as a result. Whilst existing issues here may remain the Local Plan impact will be mitigated. Junction 14 will be realigned as part of the Colts Hill Bypass scheme therefore no specific improvements have been considered at this location as set out in Section 4.3.2 of the Strategic Transport Assessment (PS_103). The IDP secures all of the necessary infrastructure including Highway improvements indicated as necessary through the extensive modelling work. The Pembury Road corridor is the preferred option to increase network capacity on the A264 rather than having improvements made to	Yes, I wish to participate at the examination hearing session - The 14 October JTB report for KCC is not widely known about. It needs to be addressed at the hearing.

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							<p>from developers for these unknown improvements.</p> <p>TWBC’s response to KCC LTP 5 consultation October 2024, stated it partly supported the plan including ‘Key highway improvements to support our Local Plan (A21 Kippings Cross and A228/264)’</p> <p>No specific improvements are set out in the Local Plan and both of the 2 out of 11 options considered were dismissed on costs (PS_103). Are there going to be improvements to Kippings Cross or not? Section 5.13 shows it to be a collision hotspot, thus needed improvements. If there will be, why is £1.5m set aside for the improvements but only 500k contributions from developers assumed?</p> <p>Hotspot Junction 107 B2160 Chestnut Lane/ Brenchley Road “Matfield Crossroads”</p> <p>The only mitigation for this hotspot is the assumption that traffic will be diverted to the A228 Colts Hill/Pembury Road corridor (section 4.3.2 of PS_103).</p> <p>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 as well as the east of PW.</p> <p>This crossroads is hazardous, with poor visibility along the route and regularly congested. There is a primary school where you have to cross the road without street lighting, a 20mph limit or formal pedestrian crossing.</p> <p>If the Badsell roundabout improvements are made but the bypass is delayed, what mitigation measures are being considered for this junction and the roads leading towards it? At what cost and who will fund it?</p> <p>We believe there should be provision for safe crossings along the B2160 and outside the school if the bypass is delayed to mitigate the increased traffic.</p> <p>Mitigations to traffic growth in Brenchley and Matfield</p> <p><u>A228 Colts Hill Bypass</u></p> <p>PS_103 concluded the bypass would be required by 2029. Two months later Sweco states the road will be at capacity by 2031 (PS_104). It seems surprising that there has been a significant change in between these two months and has not been explained in layman's terms. Such a</p>	<p>the Kippings Cross junction. Should the associated funding need to be removed from the IDP as part of reviews to it they will be.</p> <p>The change in traffic flows through Brenchley and Matfield with the proposed highway mitigation is set out in Chapter 3 of the Strategic Transport Assessment Addendum (PS_104). This demonstrates the improvements along the A228 will result in an increase in traffic along this corridor and reduction along the B2160. The Matfield Crossroads (Junction 107) junction falls out of the ‘major’ hotspot list as a result. Whilst existing issues here may remain the Local Plan impact will be mitigated.</p>	

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							<p>significant change brings into question the original analysis. What is to protect us from the from the bypass being deferred again? How will the increased traffic in the parish be dealt with without the bypass?</p> <p><u>B2160 Junction at Mascalls Court Road/Badsell Road (Mascalls Crossroads)</u> S106 contributions in the form of cash and land were made for the Mascalls Farm development (413 dwellings) for improvements to the B2107 and Badsell Roundabout/A228. The modelling for the 2023 ‘Queen Street applications’ for 1400 dwellings were based upon these improvements. On the 14 October TWBC Joint Transportation Board (JTB), KCC Highways reported that they were unable to implement the improvements to this junction. The revised approach is to expand the Badsell Road junction at the B2017 but the staggered junction at Mascall Court Road will remain. Therefore, there will be no mitigation for vehicular traffic west along Mascalls Court Road towards the Badsell Roundabout/A228.</p> <p>Why is it acceptable for residents for developments to take place without the correct infrastructure? It contradicts KCC’s ‘Infrastructure First’ approach in the KCC strategy Framing Kent’s Future 2002-26.</p> <p>Without the Mascalls Crossroads improvements and without any timeframe for delivery of the Badsell Roundabout, we would expect significantly higher flows through the villages, higher than the 4.1% modelled in the Queen Street applications.</p> <p><u>Pembury Road Corridor Improvements</u> PS103, section 4.3.2 – the modelling assumes improvements to 5 junctions along the corridor will improve capacity by 10%, which is critical for the conclusions by TWBC, KCC and NH. However, PS_104 analyses the impact of 4 of these junctions, but excludes any improvements to the NW roundabout of the dumbbell roundabout on either side of the A21. We also understand there are concerns that two of the four remaining improvements could be problematic (A264/A21 southern dumbbell may fail to meet road safety requirements, and the A264/Blackhurst Lane junction would presumably require land owned by Southern Water).</p>	<p>Chapter 4 of the Strategic Transport Assessment Addendum (PS_104) sets out a detailed analysis of when the Badsell Roundabout (Junction 13) will reach the ‘hotspot’ criteria which was identified as 2031. This analysis followed discussions between Sweco, Stantec and TWBC.</p> <p>The B2160 junction us undergoing further wok by KCC Highways to examine future improvements. The junction was subject to enhancements secured by previous planning decisions.</p>	

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							<p>How can the modelled traffic capacity improvement be 10% with these deliverability concerns? When are the improvement works going to start?</p> <p>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.</p> <p>Nevertheless, much of the additional traffic heading to the A21 via Kippings Cross from the proposed PW developments will head south along the A21 or north towards Tonbridge, Sevenoaks etc. Therefore, the proposed Pembury Road corridor improvements will have no effect on that traffic.</p> <p>Model Shift</p> <p><u>Buses</u></p> <p>PS_100 the proposal for a service every 15 min between PW, Pembury and RTW would be welcome, provided it does not involve any reduction in service to bus stops in Matfield. BMPC is concerned PS_100 does not specific the route to the taken by the revised service and that it suggests the frequency offers the opportunity to provide express services between PW and RTW, presumably not stopped at Matfield.</p> <p><u>Walking and Cycling</u></p> <p>Figure 3 in PS_100 shows the proposed pedestrian/cycle route. Assuming the new segregated route will end with the bypass at the Alders Lane junction, the cycle route would then need to use the carriageway of the remaining, narrow and heavily trafficked part of the A228. There is no additional room for cyclists to connect to Redwings Lane further south unless agreement can be reached with the relevant landowners for a behind the hedge path. The narrow, partly sunken Redwings Lane would also not be a particularly safe route for cyclists.</p> <p>Given the volume of traffic on the A228, only an entirely segregated route is likely to be sufficiently attractive to persuade people to cycle. Without the willingness to contemplate a CPO or reach agreement with the landowners (at a cost likely greater than the £1.2m in the IDP), it should be removed from the modelling assessments.</p> <p>Highways Improvement Plan (HIP)</p>	<p>The 10% increases in capacity presented in the Strategic Transport Assessment (PS_103) was based on an emerging scheme along the Pembury Road corridor. Once details of the scheme were available following the feasibility study undertaken by Stantec (PS_101), this scenario was updated to reflect the preliminary scheme designs, with the updated results presented in the Strategic Transport Assessment Addendum (PS_104).</p> <p>The Pembury Road corridor improvements as per Document PS101 are indicative schemes that demonstrate highways improvement schemes for delivering additional capacity within highway boundary land. As is typical, further details with respect to detailed design and a Road Safety Audit would need to be provided at an appropriate time, usually at planning application stage. For the purposes of the current plan-making stage, this level of detail, showing indicative improvements is considered to be appropriate and deliverable.</p> <p>The improvements to bus services presented in the Modal Shift Analysis Technical Note (PS_100) are based on the Bus Feasibility Review (PS_040). There would be no impact on existing bus services within Matfield.</p> <p>The LCWIP Phase 2 [CD_3.115b(ii)] expands upon the existing Tunbridge Wells LCWIP and develop complementary measures for Low-Traffic Neighbourhoods and Inter-Urban Routes which will further support the Borough’s ambitions for mode shift to sustainable modes.</p>	

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							<p>It was suggested at the Stage 3 hearings, that is monitoring indicated that contrary to Sweco modelling, congestion was substantially worse or the effect on road safety was severe, this could be addressed through the HIP. BMPC, through extensive discourse with KCC on the HIP, has established the only traffic calming measures KCC are willing to permit on the B2160 are some road markings and the mobile speed indicator devices, which BMPC has already funded and are only advisory.</p> <p>The discussions established that the B2160 through Matfield will not qualify for safe crossing facilities and therefore, the HIP would not be capable for providing a solution.</p> <p>High Weald National Landscape – Rural Lanes The AONB Management Plan was adopted by TWBC in June 2024. The character and ecology of historic routeways forms part of objectives R1 and R2. The existing traffic congestion at peak times, and summer/holiday weekends already leads to unacceptable volumes of traffic diverting onto the historic routeways in the parish. If no Kippings Cross improvements are included in the plan and the bypass is delayed or not built, there will be further pressure leading to increased damage and erosion to these lanes.</p> <p>BMPC believe TWBC and KCC are failing to fulfil the new statutory duty under Section 245 of the Levelling-up and Regeneration Act 2023 by failing to seek to conserve and enhance the historic rural lanes in the borough.</p>	<p>Inter-Urban Routes such as the A228 will be fit for cycling between the borough’s main urban settlements using consistent, safe, and intuitive designs to ensure that cyclists can follow the routes comfortably from beginning to end.</p> <p>See responses above on modelling work demonstrating Local Plan impacts through Matfield will mitigated.</p>	
NEBD20-3		Save Capel			PS_100 to PS_104		<p>Unsound, legal compliance not stated</p> <p>Save Capel’s Transport Consultants (“Motion”) have provided a technical note on this evidence which is included as Appendix 1 of the representation and demands fully consideration to the note.</p> <p>PS_100 – Modal Shift Analysis Technical Note (April 2024)</p> <ul style="list-style-type: none">The Highways and Transport evidence relies on the claim by TWBC of a 10% modal shift away from the use of cars to more sustainable options including buses, rail and cycling however no evidence to support the claim of a 10% shift has been provided meaning other evidence and outputs cannot be relied upon.	<p>The 10% modal shift target used throughout the Local Plan modelling was based on research presented in Chapter 10.5 of the 2021 Transport Assessment (3.114).</p> <p>It should be noted that the 10% target (actually 9% in the model) has only been applied to total trips to / from the Paddock Wood development.</p>	<p>Yes, I wish to participate at the examination hearing session - SC intends to continue to participate fully in any remaining stages of the Local Plan’s review and will seek to make formal representations in any future hearings during which the issues raised in this</p>

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							<ul style="list-style-type: none">Save Capel (SC) considers the 10% modal shift is <u>not deliverable</u> because travelling by car is twice as fast as any other form of transport (Table 1), no direct cycle route between Paddock Wood and Tonbridge for cyclists, proposed cycle route from Paddock Wood to Tunbridge Wells (Figure 3) includes the already busy A228, no new bus services proposed directly connecting Paddock Wood and Tonbridge, the PW Orbital Bus service would not operate beyond 7pm, other references to “Bus Rapid Transport” and “turn up and go” services are misleading.This leads to a much better cycle and public transport being proposed than is capable of being delivered. The most optimistic high scenario (9% reduction) is below all below the 10% claimed, therefore the evidence submitted to the EIP is wrong (See Appendix 1 – 2.8/2.9) <p>PS_101 - Pembury Road Corridor (PRC) – Junction Capacity Assessment (June 2024)</p> <ul style="list-style-type: none">SC (Motion) details issues with 3 out of 5 of the major junctions (Wood Gate Corner, Halls Hole Road, Sandhurst Road) in PS_101 concerning topography, space required and ownership.Additionally there are other issues associated with the two A21 Dumbbell Roundabouts:<ul style="list-style-type: none"><u>A21 East Roundabout</u>, 5.7 ii. TWBC have relied on the proposed mitigation of the Woodgate Corner junction being deliverable (in spite of Motion’s issues raised).<u>A21 West Roundabout</u>, 5.7 iii. Forecast to operate beyond capacity in all scenarios. The design sketch is of poor quality and does not meet requirements of the Design Manual for Roads and Bridges (DMRB) which are mandatory.There are therefore design and potential safety issues with all the proposed mitigations for the PRC.	<p>Trips between Paddock Wood and Tonbridge has been reduced by 5% as set out in Table 2 in the Modal Shift Analysis Technical Note (PS_100).</p> <p>The Pembury Road corridor improvements as per Document PS101 are indicative schemes that demonstrate highways improvement schemes for delivering additional capacity within highway boundary land. As is typical, further details with respect to detailed design and a Road Safety Audit would need to be provided at an appropriate time, usually at planning application stage. For the purposes of the current plan-making stage, this level of detail, showing indicative improvements is considered to be appropriate and deliverable.</p>	representation are discussed.

							<div><div><div>PS_102 - Junction Hotspot Comparison (June 2024)<ul style="list-style-type: none">Hotspots analysis are wholly reliant on modal shift being realistic, PRC mitigation being deliverable and a change in Volume over Capacity (V/C) to trigger mitigation, none of which can be relied upon.SC has serious concerns that junctions 8 and 88 remain in the Hotspots Comparison list despite the reduced housing growth from Tudeley Village removal.A simple plan to show the changes on traffic flows between the Submission Local Plan and the proposed growth now as requested by the Inspector during Stage 3 Hearings has not been delivered.</div><div><div>PS_104 - Strategic Transport Assessment Addendum (June 2024)<ul style="list-style-type: none">A264 Pembury Road Corridor tests prepared for TWBC by Stantec is simply not deliverable and so the Addendum's starting point is falsely based. SC made this point orally in July, and will again, if needed at any further hearing.Table 2 is a replication of what has already been submitted in PS_103 April 2024.We have previously noted to the Inspector that the criteria used to determine hotspots are wrong in that TWBC asserts that infrastructure isn't needed until a V/C ratio is greater than 5 percentile points – a flawed logic for not taking existing road conditions into account.The table shows that in 2024 the Badsell roundabout is already failing in terms of capacity, yet the submission claims that improvements are not needed until at least 2031. The 'residual cumulative impacts' in NPPF 115 should be referred to.</div><div><div>Conclusion<ul style="list-style-type: none">The EIP proceedings have been marked by TWBC providing incomplete and late information. When additional evidence is requested, it fails to justify the claims and assumptions in the Plan.SC believes that further evidence on Highways and Transport will not change their view that the current evidence is unreliable. SC argue that any new evidence would only highlight the significant problems in the Local Plan,</div></div></div></div><div><div><p>The hotspot criteria, as presented in Section 3.3 of the Strategic Transport Assessment (PS_103), were derived to identify locations where the Local Plan is expected to have a significant impact. Both Kent County Council and National Highways were consulted throughout the process.</p><p>Mitigation is proposed at Junction 8 and Junction 88 is recommended for inclusion in the Monitor and Manage Plan.</p></div><div><p>Whilst there may be existing capacity issues the analysis has focussed on mitigating the Local Plan impact. Chapter 4 of the Strategic Transport Assessment Addendum (PS_104) sets out a detailed analysis of when the Badsell Roundabout (Junction 13) will reach the 'hotspot' criteria which was identified as 2031.</p></div></div></div>	
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							showing that necessary work was not done earlier and attempts to “shore up” the plan are failing.		
NEBD24-2, 24-3, 24-4, 24-5, 24-6, 24-7	Mr Nigel De Wit	National Highways			PS_099 to PS_104	We do not consider that any additional modifications to the Local Plan are necessary.	<p>Legally compliant and sound</p> <p>PS_099: This document is an accurate summary of the transport technical reports. We confirm National Highways have engaged with the Council and their consultants throughout the undertaking of the technical work.</p> <p>PS_100: We consider the information and analysis set out in this report supports the assumptions around modal shift which have informed the highway modelling.</p> <p>PS_101: We consider this assessment suitability demonstrates the proposed upgrades to a series of junctions on this corridor will achieve the necessary capacity increases to accommodate demand associated with the Local Plan. These mitigations will seek to ensure the use by traffic which may seek to avoid the predicted congestion by routing via the A21 Kippings Cross junction, thus removing the need for mitigation at this location.</p> <p>PS_102 and 103: We consider these reports appropriately reflect the additional modelling work has been undertaken in response to the updated development strategy.</p> <p>PS_104: We consider this report appropriately reflects the additional modelling work undertaken by Sweco to test the proposed mitigation scheme for the A264 Pembury Road corridor, as was requested by NH and KCC.</p>	This is noted.	National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session; we have set out our concerns in this response. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by this or other responses to this consultation, we will be happy to do so.
NEBD28-2	Mrs Carol Richards				PS_099		<p>Legally non-compliant and unsound</p> <p>Colts Hill Bypass needs to be built before 2026. Does not believe it will be built until at least 2031 after listening to the hearing sessions. The roads are already at 95% capacity.</p>	Whilst there may be existing capacity issues the analysis has focussed on mitigating the Local Plan impact. Chapter 4 of the Strategic Transport Assessment Addendum (PS_104) sets out a detailed analysis of when the Badsell Roundabout (Junction 13) will reach the 'hotspot' criteria which was identified as 2031.	No, I do not wish to participate at the examination hearing session
NEBD39-5	Stephanie Holt-Castle	Kent County Council (KCC)			PS_099 to PS_104		<p>Legal compliance and soundness not stated</p> <p>All below comments are on Highways and Transportation in relation to:</p>	This is noted.	Not stated

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							<p><u>PS 099 Introductory Note to Highways Modelling Reports</u> County Council acknowledges the purpose of this note is to set out a list of highways related reports produced to support the new Local Plan. Comments relating to those documents included below.</p> <p><u>PS 100 Modal Shift Analysis (Vs2) 9th April 2024</u> Support the high modal shift vision and infrastructure proposed, including enhancements to bus services, rail links, and walking and cycling infrastructure.</p> <p>Accepted that approach is in line with Circular 01/2022 and NPPF. Additional confidence in the success of sustainable transport interventions is provided through development of a Monitor and Manage strategy and the requirement for travel plans.</p> <p>In accordance with Circular 01/2022 three demand scenarios (low, medium, high modal shift) were developed. The new Local Plan strategy has been modelled for the low and high modal shift scenarios and major hotspots for each scenario. In the high modal shift scenario only one hotspot is removed from the list of major hotspots when compared to the low modal shift scenario. This is the junction of A228/A264/A21 and this junction is included within the A264 Pembury Road Corridor – Junction Capacity Assessment with mitigation proposed.</p> <p><u>PS 101 A264 Pembury Road Corridor – Junction Capacity Assessment 28th June 2024</u> County Council reviewed this Technical Note prior to the 2024 hearing sessions and found it acceptable subject to the following: the schemes presented in the Technical Note are high level designs appropriate for the Local Plan examination stage and subject to the County Council’s Technical Approval Process (TAP), safety audit, costings and checks for statutory undertakers’ equipment.</p> <p><u>PS 102 Junction Hotspot Comparison 17th June 2024</u> This is useful to compare hotspots identified in the transport evidence supporting the Submitted Local Plan with those identified in the evidence</p>		

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							<p>supporting the revised Local Plan. Mitigation measures are included in the IDP for the key major hotspots, KCC has recommended in comments for PS_095 Policy STR/SS1 and the IDP (PS_105) that those junctions/links identified as hotspots but not included for mitigation in the IDP are included in the Monitor and Manage strategy.</p> <p><u>PS 103 Strategic Transport Assessment Modelling Appraisal April 2024</u></p> <p>There are a number of junctions identified as hotspots where mitigation is not proposed at this stage. County Council recommend these junctions are included in the Monitor and Manage Strategy, however reference is not included in the IDP, Viability Assessment or Policy STR/SS 1.</p> <p>These junctions are listed below:</p> <p><i>Junction 14: A228 / Alders Road / Crittenden Road</i></p> <p>This junction will be reconfigured as part of the Colts Hill Bypass scheme. It has not bee identified as a collision hotspot in the recent Sweco study but there will an increase in traffic movements along the A228 prior to delivery of the bypass. Therefore, it is recommended to include this junction in the Monitor and Manage Strategy to monitor the crash record leading up to the delivery of the bypass.</p> <p><i>Junction 13 A228/ Maidstone Road</i></p> <p>The junction was identified in the Strategic Transport Assessment as a ‘major hotspot’ and so additional modelling was undertaken in the A264 Corridor Assessment (PS_101). The capacity assessment concluded that the junction would work within capacity for all demand scenarios and so no mitigation is needed. However, as it has also been identified as a collision hotspot in the STA Addendum and is expected to experience significant increases in traffic flow, the County Council recommends it is included in the Monitor and Manage Strategy in terms of safety.</p> <p><i>Junction 107 Matfield Crossroads</i></p>		

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							<p>The County Council will work with TWBC to identify traffic management measures and signage measures which can help to discourage the potential for rat running on rural roads. This junction should also be included in the Monitor and Manage Strategy.</p> <p><i>Junction 72 A267/B2169 Birling Road and Junction 88: B2017/ Hartlake Road</i></p> <p>These junctions are included in the IDP and the Viability Assessment but not referred to in the revised Policy STR/SS 1. Further detail is required of the capacity results and proposed mitigation. Recommended that mitigation for these junctions is included in the Local Plan Strategy and brought forward if identified as necessary in the Monitor and Manage Strategy. The Monitor and Manage Strategy should also review the crash record at these junctions.</p> <p><i>B2017 Five Oak Green</i></p> <p>The B2017 is included in the latest version of the IDP and Viability Assessment and should also be included in Policy STR/SS1, and the Monitor and Manage Strategy to review capacity and safety as traffic flows increase along the route.</p> <p>The STA reviewed personal injury crashes over a 3-year period at sites with increased vehicle traffic due to the Local Plan Strategy and recommended further exploration with the County Council Highway Improvements team.</p> <p><u>PS 101 A264 Pembury Road Corridor – Junction Capacity Assessment and PS 104 Strategic Transport Assessment Addendum June 2024</u></p> <p>The County Council, as Local Highway Authority, is broadly in agreement with the conclusions of the STAA subject to the following:</p> <p>Reference to the following junctions in Policy STR/SS1 for inclusion in the Monitor and Manage Strategy as already outlined in the comments relating to the STA above:</p> <p>- Junction 13: A228 / Maidstone Road</p>		

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							<div>- Junction 14: A228 / Alders Road / Crittenden Road</div> <div>- Junction 72: A267 / B2169 Birling Road</div> <div>- Junction 88: B2017 / Hartlake Road</div> <div>- Junction 107: Matfield Crossroads</div> <div>- B2017 Five Oak Green</div>		
NEBD42-5	Carol Williams	Paddock Wood Town Council	Troy Hayes	Troy Planning + Design	PS_099 to PS_104		Not legally compliant or sound The Town Council has made multiple representations to the transportation evidence in its previous submissions, including the Stage 3 hearing sessions, and wishes to rely on these for this consultation.	This is noted.	Yes, I wish to participate at the examination hearing session - The Town Council wishes to participate in any future Hearings on the Local Plan given the scale of growth still proposed at Paddock Wood and given the well-known constraints and complexities of the area as well as the Local Plan, masterplanning, infrastructure delivery and funding uncertainties that still remain.