



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
--

Box 1: Name of the Local Plan Evidence Base Document to which this representation relates:	PS_095 Revised Policy Wording for Policy STR/SS 1 – Paddock Wood and Land at East Capel (September 2024)
---	---

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	De Wit	
Job title (where relevant)	Assistant Spatial Planner	
Organisation (where relevant)	National Highways	
Address Line 1	South East Region Operations Directorate	
Address Line 2	Bridge House	

Address Line 3	1 Walnut Tree Close	
Address Line 4	Guildford, Surrey	
Postcode	GU1 4LZ	
Telephone number	██████████	
Email address (where relevant)	██	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	National Highways
-----------------------------	-------------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Whole Document	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
<p>We wish to confirm that the revised wording of policy STR/SS 1 – Paddock Wood and Land at East Capel is (in our view) compatible with the technical assessments which have been carried out to demonstrate the impacts of the proposed allocation on the Strategic Road Network (SRN).</p> <p>However, we have previously recommended some amendments to the previous policy wording which are not present in the version of the policy text presented as part of this consultation. We remain of the view that these amendments are necessary to ensure that the policy is effective in delivering development in a manner which is consistent with the assumptions which have underpinned the technical assessments, as well as the requirements of Circular 01/2022. We have set these changes out under the “modifications” question below.</p> <p>Notwithstanding the above, the wording of the policy makes clear the mechanism by which the necessary highway infrastructure and other transport-related mitigation measures will be delivered. We have made some further comments on the IDP on a separate copy of this consultation form.</p> <p>With specific regard to the A264 / Pembury Road corridor, we note that the works to deliver the various components of this scheme are to be funded in stages, such that improvements to individual junctions within the overall scheme will be implemented in a sequence, such that the overall capacity of the corridor increases broadly in line with the delivery of development at Paddock Wood. We are content that this process should allow completion of all the works in a timely fashion and will allow appropriate traffic management procedures to be implemented. Whilst delivery of the works remains the responsibility of the Council and/or the Paddock Wood developers, National Highways will assist in all aspects as necessary to facilitate the further technical design and approvals needed, and will enter into the necessary legal agreements (such as Section 278 or similar) to allow the required works to take place.</p>	

	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p>
6.	<p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>

The specific changes to the wording of Policy STR/SS1 which we consider are necessary in order to make the policy more robust and consistent with national policy are as follows:

Masterplanning (page 5) – reference to vision-led development that manages down the traffic impact of development should feature at the top, as part of point 7. This is not just relevant to the parking strategy and/or other individual elements of the development and should therefore be included in the main over-arching masterplan principles embedded into the policy.

Masterplanning (page 5) – Point 8 should be amended / expanded so that it refers to the need to manage down the traffic impact of planned development by maximising opportunities for sustainable travel (01/2022, para.23).

Strategic Infrastructure (page 7) – Point 12 makes reference to conditions and S106 agreements as the legal mechanisms for securing necessary mitigation measures. This should also make reference to the need for any works to the SRN to be secured and delivered via a Section 278 agreement.

Strategic Infrastructure (page 7) – Point 13 This should clearly state that the delivery of necessary transport infrastructure shall be overseen by the monitor and manage regime involving relevant stakeholders as detailed in the supporting Infrastructure Delivery Plan. To ensure consistency across the Local Plan, other relevant policies, eg STR6 and TP1 of the submitted Local Plan, should be amended accordingly.

Strategic Infrastructure (page 7) – Point 14 makes reference to contributions to be paid in accordance with the IDP. We have commented separately on this document but wish to re-iterate that National Highways will not collect contributions toward works required to mitigate impacts associated with the Local Plan.

Strategic Infrastructure (page 7) – Point 15, bullet point e) should specifically reference the works to the A264 Pembury Road corridor, due to their importance in achieving an acceptable level of mitigation for the Paddock Wood sites.

7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>

8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)</p>	
	<p>No, I do not wish to participate at the examination hearing session</p>	
	<p>Yes, I wish to participate at the examination hearing session</p>	

9.	<p>If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:</p>	
	<p>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.</p>	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	22 October 2024
------------------	---	-------------	--------------------



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
--

Box 1:	
Name of the Local Plan Evidence Base Document to which this representation relates:	PS_099 Introductory Note to Highway Modelling Reports (September 2024)

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	De Wit	
Job title (where relevant)	Assistant Spatial Planner	
Organisation (where relevant)	National Highways	
Address Line 1	South East Region Operations Directorate	
Address Line 2	Bridge House	

Address Line 3	1 Walnut Tree Close	
Address Line 4	Guildford, Surrey	
Postcode	GU1 4LZ	
Telephone number	██████████	
Email address (where relevant)	██	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	National Highways
-----------------------------	-------------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Whole Document	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
<p>We consider that this document represents an accurate summary of the transport technical reports which have been prepared on behalf of the Council to inform transport-related matters addressed as part of the Stage 3 hearings.</p> <p>We confirm that National Highways has engaged with the Council and their appointed consultants throughout the undertaking of the technical work. As such, National Highways has been able to comment on this work as part of our hearing statements for Stage 3, and to respond to questions put by the Inspector during the associated Stage 3 hearing sessions.</p> <p>Further details of our appraisal of the transport evidence which forms part of the current consultation are set out in our submitted Stage 3 hearing statements for matter 4 (REP-763700-001 National Highways Hearing Statement Matter 4) and matter 7 (REP-763700-002 National Highways Hearing Statement Matter 7).</p>	

6.	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We do not consider that any additional modifications to the Local Plan are necessary.

7.	Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

8.	If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)
	No , I do not wish to participate at the examination hearing session
	Yes , I wish to participate at the examination hearing session

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:
-----------	---

National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by other responses to this consultation, we will be happy to do so.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	22 October 2024
------------------	---	-------------	--------------------



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
--

Box 1:	
Name of the Local Plan Evidence Base Document to which this representation relates:	PS_100 Modal Shift Analysis Technical Note (April 2024)

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	De Wit	
Job title (where relevant)	Assistant Spatial Planner	
Organisation (where relevant)	National Highways	
Address Line 1	South East Region Operations Directorate	
Address Line 2	Bridge House	

Address Line 3	1 Walnut Tree Close	
Address Line 4	Guildford, Surrey	
Postcode	GU1 4LZ	
Telephone number	██████████	
Email address (where relevant)	██	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	National Highways
-----------------------------	-------------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Whole Document	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We consider that the information and analysis set out in this report supports the assumptions around modal shift which have informed the highway modelling (strategic and local) which is the subject of further evidence presented as part of the current consultation and in advance of the Stage 3 hearings.

We note that this document summarises analysis from earlier technical work and clarifies how amendments have been made specifically to address the changes to the proposals at Paddock Wood which were proposed in response to the Inspectors' Initial Findings.

Further details of our appraisal of the transport evidence which forms part of the current consultation are set out in our submitted Stage 3 hearing statements for matter 4 (REP-763700-001 National Highways Hearing Statement Matter 4) and matter 7 (REP-763700-002 National Highways Hearing Statement Matter 7).

6.	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We do not consider that any additional modifications to the Local Plan are necessary.

7.	Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

8.	If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)
	No , I do not wish to participate at the examination hearing session
	Yes , I wish to participate at the examination hearing session

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:
-----------	---

National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by other responses to this consultation, we will be happy to do so.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	22 October 2024
-----------	---	------	--------------------



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
--

Box 1:	
Name of the Local Plan Evidence Base Document to which this representation relates:	PS_101 A264 Pembury Road corridor – Junction capacity assessment (June 2024)

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	De Wit	
Job title (where relevant)	Assistant Spatial Planner	
Organisation (where relevant)	National Highways	
Address Line 1	South East Region Operations Directorate	
Address Line 2	Bridge House	

Address Line 3	1 Walnut Tree Close	
Address Line 4	Guildford, Surrey	
Postcode	GU1 4LZ	
Telephone number	██████████	
Email address (where relevant)	██	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	National Highways
-----------------------------	-------------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Whole Document	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We consider that the Pembury Road corridor assessment suitably demonstrates that the proposed upgrades to a series of junctions on this corridor (including the A21 / A264 dumbbell roundabouts) will achieve the necessary capacity increases to accommodate demand associated with the Local Plan. These mitigations will also serve to maintain the use of this corridor by traffic which would otherwise seek to avoid predicted congestion by routing via the A21 Kippings Cross junction, removing the need for separate mitigation measures to be provided in this location.

Further details of our appraisal of the transport evidence which forms part of the current consultation are set out in our submitted Stage 3 hearing statements for matter 4 (REP-763700-001 National Highways Hearing Statement Matter 4) and matter 7 (REP-763700-002 National Highways Hearing Statement Matter 7).

6.	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We do not consider that any additional modifications to the Local Plan are necessary.

7.	Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

8.	If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)
	No , I do not wish to participate at the examination hearing session
	Yes , I wish to participate at the examination hearing session

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:
-----------	---

National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by other responses to this consultation, we will be happy to do so.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	22 October 2024
------------------	---	-------------	--------------------



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
--

Box 1:	
Name of the Local Plan Evidence Base Document to which this representation relates:	PS_102 Junction Hotspot Comparison (June 2024)

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	De Wit	
Job title (where relevant)	Assistant Spatial Planner	
Organisation (where relevant)	National Highways	
Address Line 1	South East Region Operations Directorate	
Address Line 2	Bridge House	

Address Line 3	1 Walnut Tree Close	
Address Line 4	Guildford, Surrey	
Postcode	GU1 4LZ	
Telephone number	██████████	
Email address (where relevant)	██	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	National Highways
-----------------------------	-------------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Whole Document	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
<p>We consider that this report appropriately reflects the additional modelling work which has been undertaken in response to the changes to the Local Plan allocations (principally relating to Paddock Wood and the removal of Tudeley Village) which have been brought forward by the Council in response to the Inspectors' Initial Findings.</p> <p>We confirm that National Highways has been previously consulted on the technical work presented in the document and this has informed our hearing statements for Stage 3.</p> <p>Further details of our appraisal of the transport evidence which forms part of the current consultation are set out in our submitted Stage 3 hearing statements for matter 4 (REP-763700-001 National Highways Hearing Statement Matter 4) and matter 7 (REP-763700-002 National Highways Hearing Statement Matter 7).</p>	

6.	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We do not consider that any additional modifications to the Local Plan are necessary.

7.	Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

8.	If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)
	No , I do not wish to participate at the examination hearing session
	Yes , I wish to participate at the examination hearing session

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:
-----------	---

National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by other responses to this consultation, we will be happy to do so.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	22 October 2024
------------------	---	-------------	--------------------



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
--

Box 1: Name of the Local Plan Evidence Base Document to which this representation relates:	PS_103 Strategic Transport Assessment – Modelling Appraisal (April 2024)
---	---

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	De Wit	
Job title (where relevant)	Assistant Spatial Planner	
Organisation (where relevant)	National Highways	
Address Line 1	South East Region Operations Directorate	
Address Line 2	Bridge House	

Address Line 3	1 Walnut Tree Close	
Address Line 4	Guildford, Surrey	
Postcode	GU1 4LZ	
Telephone number	██████████	
Email address (where relevant)	██	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	National Highways
-----------------------------	-------------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Whole Document	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
<p>We consider that this report appropriately reflects the additional modelling work which has been undertaken in response to the changes to the Local Plan allocations (principally relating to Paddock Wood and the removal of Tudeley Village) which have been brought forward by the Council in response to the Inspectors' Initial Findings.</p> <p>We confirm that National Highways has been previously consulted on the technical work presented in the document and this has informed our hearing statements for Stage 3.</p> <p>We note that this document presents the updated analysis for the A21 Kippings Cross roundabout and the initial analysis of the Pembury Road corridor which in turn has provided a rationale for the subsequent Pembury Road corridor study (reported in consultation document PS_101).</p> <p>Further details of our appraisal of the transport evidence which forms part of the current consultation are set out in our submitted Stage 3 hearing statements for matter 4 (REP-763700-001 National Highways Hearing Statement Matter 4) and matter 7 (REP-763700-002 National Highways Hearing Statement Matter 7).</p>	

6.	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We do not consider that any additional modifications to the Local Plan are necessary.

7.	Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

8.	If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)
	No , I do not wish to participate at the examination hearing session
	Yes , I wish to participate at the examination hearing session

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:
-----------	---

National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by other responses to this consultation, we will be happy to do so.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	22 October 2024
------------------	---	-------------	--------------------



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
--

Box 1:	
Name of the Local Plan Evidence Base Document to which this representation relates:	PS_104 Strategic Transport Assessment Addendum (June 2024)

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	De Wit	
Job title (where relevant)	Assistant Spatial Planner	
Organisation (where relevant)	National Highways	
Address Line 1	South East Region Operations Directorate	
Address Line 2	Bridge House	

Address Line 3	1 Walnut Tree Close	
Address Line 4	Guildford, Surrey	
Postcode	GU1 4LZ	
Telephone number	██████████	
Email address (where relevant)	██	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	National Highways
-----------------------------	-------------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Whole Document	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
<p>We consider that this report appropriately reflects the additional modelling work which has been undertaken by SWECO to test the proposed mitigation scheme for the A264 Pembury Road corridor. We note that this test was requested by National Highways and Kent County Council Highways to demonstrate that the proposed mitigation would successfully draw vehicle trips away from the A21 Kippings Cross junction and the local roads used to access it, such that additional mitigation in these locations is not required.</p> <p>We confirm that National Highways has been previously consulted on the technical work presented in the document and this has informed our hearing statements for Stage 3.</p> <p>Further details of our appraisal of the transport evidence which forms part of the current consultation are set out in our submitted Stage 3 hearing statements for matter 4 (REP-763700-001 National Highways Hearing Statement Matter 4) and matter 7 (REP-763700-002 National Highways Hearing Statement Matter 7).</p>	

6.	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We do not consider that any additional modifications to the Local Plan are necessary.

7.	Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

8.	If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)
	No , I do not wish to participate at the examination hearing session
	Yes , I wish to participate at the examination hearing session

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:
-----------	---

National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by other responses to this consultation, we will be happy to do so.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	22 October 2024
------------------	---	-------------	--------------------



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
--

Box 1:	
Name of the Local Plan Evidence Base Document to which this representation relates:	PS_105 TWBC Final Infrastructure Delivery Plan IDP August 2024.

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	De Wit	
Job title (where relevant)	Assistant Spatial Planner	
Organisation (where relevant)	National Highways	
Address Line 1	South East Region Operations Directorate	
Address Line 2	Bridge House	

Address Line 3	1 Walnut Tree Close	
Address Line 4	Guildford, Surrey	
Postcode	GU1 4LZ	
Telephone number	██████████	
Email address (where relevant)	██	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	National Highways
-----------------------------	-------------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Whole Document	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
<p>We are broadly content with the content of the submitted version of the Infrastructure Development Plan (IDP), in that this has been updated to our satisfaction with regard to the revised and additional mitigation proposals which the additional technical work undertaken subsequent to the Inspectors' Initial Findings consultation has identified as being necessary to address the expected impacts to the Strategic Road Network (SRN).</p> <p>We note that Theme 1 (Transport) makes specific reference to Department for Transport Circular 01/2022 and establishes key concepts from that document, including "Vision and Validate" and "Monitor and Manage" approaches as being a core part of the transport infrastructure strategy for both the strategic and local road networks.</p> <p>However, the IDP does not currently incorporate the current development trajectory in the form that we have previously suggested (i.e. following the structure and approach laid out in the Crawley Local Plan via the Infrastructure Delivery Schedule, where the Inspector's report has now been issued); this would benefit the monitor and manage regime by providing a starting point for determining the currency of the phasing of the supporting infrastructure alongside the development.</p>	

6.	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We have previously provided the council with a copy of the Infrastructure Delivery Schedule which forms part of the IDP for the Crawley Local Plan; this document may also be found via the following link: <https://crawley.gov.uk/planning/planning-policy/local-plan/local-plan-examination/crawley-borough-council-examination-documents> as document CBC/KD/IP/07. We would recommend that a similar schedule be prepared for the schemes included in the Tunbridge Wells IDP document; this will allow the Monitor and Manage process to track the requirements and delivery of phased mitigation measures as implementation of the Plan progresses.

7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>

8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)</p>	
	<p>No, I do not wish to participate at the examination hearing session</p>	
	<p>Yes, I wish to participate at the examination hearing session</p>	

9.	<p>If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:</p>
-----------	--

National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by other responses to this consultation, we will be happy to do so.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	22 October 2024
------------------	---	-------------	--------------------



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
--

Box 1: Name of the Local Plan Evidence Base Document to which this representation relates:	PS_109 Revised Policy Wording and supporting text for Policy STR 1 – The Development Strategy (September 2024)
---	---

Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	De Wit	
Job title (where relevant)	Assistant Spatial Planner	
Organisation (where relevant)	National Highways	
Address Line 1	South East Region Operations Directorate	
Address Line 2	Bridge House	

Address Line 3	1 Walnut Tree Close	
Address Line 4	Guildford, Surrey	
Postcode	GU1 4LZ	
Telephone number	██████████	
Email address (where relevant)	██	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	National Highways
-----------------------------	-------------------

3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Whole Document	
Paragraph number or appendix		

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
<p>We are content that the revised wording of Policy STR 1 responds appropriately to the revisions to the Paddock Wood proposals and removal of Tudeley Village which have been brought forward in response to the Inspectors' Initial Findings.</p> <p>We note that the revised policy wording introduces a commitment to a focused review of the plan (to commence within 6 months of adoption of the plan, with an updated plan to be submitted within 30 months of the commencement of the review).</p> <p>This will enable more detailed consideration of the borough's needs toward the end of the current submitted plan period. In combination with the Monitor and Manage Strategy (for which key principles are established in the submitted Infrastructure Delivery Plan) this will enable any necessary adjustments to the mitigations proposed in the current Local Plan to be appraised. However, for avoidance of doubt, in regards specifically to the Strategic Road Network, we are satisfied that the submitted technical work has provided acceptable evidence of the currently expected performance of the SRN at the end of the current plan period, subject to the agreed mitigations being implemented in accordance with the timescales established in Policy STRSS1 and reflected in the IDP.</p>	

6.	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
-----------	--

We do not consider that any further modifications are required to this policy to make it sound in the context of the wider Local Plan.

7.	Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

8.	If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)
	No , I do not wish to participate at the examination hearing session
	Yes , I wish to participate at the examination hearing session

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:
-----------	---

National Highways does not have any matters to raise in relation to this document which we wish to discuss at the hearing session. However, should the Inspector wish representatives of National Highways to attend to facilitate discussion on matters or points raised by other responses to this consultation, we will be happy to do so.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	22 October 2024
------------------	---	-------------	--------------------