



Tunbridge Wells Local Plan Examination

Red, Amber, Green (RAG) Assessment

Access and Movement

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Contents

1	Introduction.....	1
1.1	Overview.....	1
1.2	RAG Assessment Definitions	1
2	RAG Assessment, Access and Movement	1
2.1	Walking and Cycling.....	1
2.2	Public Transport	3
2.3	Congestion and Traffic	4
2.4	Five Oak Green Bypass	5
3	Scope of Work	9

Appendices

Appendix A Inspectors Findings

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1 Introduction

1.1 Overview

- 1.1.1 Tunbridge Wells Borough Council (TWBC) is currently in the process of preparing its new Local Plan. The Local Plan has now been submitted to the Secretary of State for independent examination and the examination process is underway. Most recently, following an Examination in Public (EiP), the Inspector has provided their initial findings in a written format. A copy of the Inspector's letter can be found at **Appendix A**.
- 1.1.2 Stantec have been appointed by TWBC to undertake a Red, Amber, Green (RAG) Assessment in relation to the Access and Movement findings in the Inspector's letter, which is titled '*Examination of the Tunbridge Wells Borough Local Plan: Initial Findings*'. This RAG Assessment will specifically relate to the section of the document titled '*The Strategy for Tudeley Village – Policy STR/SS3*'. Tudeley Village is a strategic site for 2,800 homes that is allocated within the TWBC Examination Local Plan. It is emphasised that this RAG Assessment focuses on matters relating to movement and access. Viability is a different matter and will be looked at separately by TWBC and their relevant consultants.
- 1.1.3 Within the above-mentioned document, the Inspector states that at the current time there are significant and fundamental unanswered questions relating to Tudeley Village regarding the:
- Accessibility of the site by sustainable modes of transport;
 - Ability to successfully mitigate against serious impacts on the highway network;
 - Suitability and deliverability of the Five Oak Green bypass; and
 - Ability of the site to deliver housing at the rate and scale envisaged by the Plan.
- 1.1.4 At the end of the document, the Inspector states that before the examination of the Local Plan can be moved forward, and for the plan to be considered sound and capable for adoption, the plan will need to be modified in relation to Tudeley Village. The Inspector believes there are three broad options available to the Council. They are:
- Provide additional information to justify the Tudeley Village allocation as submitted.
 - Modify the submitted Plan by making significant changes to the Tudeley Village allocation, and in doing so, seek to overcome the soundness issues identified above.
 - Delete the allocation from the submitted Plan.
- 1.1.5 The aim of this RAG assessment will be to analyse the Inspector's comments and determine the nature and extent of additional evidence that can be provided to the Inspector in relation to the questions raised. The likelihood of each question being satisfactorily answered will be categorised as red, amber or green depending upon the difficulty/complexity and timescale of providing the additional evidence. The definition of each colour is provided in the following section.

1.2 RAG Assessment Definitions

1.2.1 Stantec's RAG risk rating generally aligns with the following criteria:

	This concern is unlikely to pose a significant risk to the progression of the Local Plan Examination. It is believed the concern can be overcome with little additional work, most likely in the form of written evidence by specialists, supported by other documents already in place.
	Without additional evidence, this concern would pose a risk to the progression of the Local Plan Examination. Stantec believe it is likely that the concern can be overcome but it is highly likely that additional evidence would need to be submitted to the Inspector and this may cause some delay and result in additional cost.
	It is likely that significant additional evidence would need to be presented to the Examination to overcome the concern, with no guarantee of success. This concern has the potential to cause significant delay to the progression of the Local Plan Examination and could result in significant changes needing to be made to the Local Plan strategic sites that may result in significant extra cost.

2 RAG Assessment, Access and Movement

2.1 Walking and Cycling

Inspector's Concern	Commentary	Recommendation/Action
<p>New dedicated foot/cycle route into Tonbridge</p> <p><i>"13. Pedestrian and cycle links would be provided as part of the scheme and there is a commitment to include a new dedicated route into Tonbridge. Although this could be secured by policies in the Plan, the distances involved to the centre of Tonbridge and back would not be conducive to walking. Likewise, it would be unrealistic to expect a significant number of people to cycle into Tonbridge, especially during the darker, winter months or during periods of inclement weather. The Local Cycling and Walking Infrastructure Plan: Phase 22 identifies some of the issues, which include isolation and a lack of passive surveillance due to the remoteness of a route in this location."</i></p>	<p>In paragraph 13 of the Inspector's initial findings, they raise concerns about the likelihood of a significant number of people cycling to Tonbridge, especially during the darker, winter months or during periods of inclement weather. They also state that the <i>'Local Cycling and Walking Infrastructure Plan: Phase 2'</i> identifies problems with the route including isolation and lack of passive surveillance.</p> <p>Stantec have sought advice from colleagues in the business who specialise in cycle infrastructure and shown them the proposed route between Tudeley Village and Tonbridge in the TWBC Local Cycling and Walking Infrastructure Plan (LCWIP) which utilises a public right of way (PROW) along Postern Lane, which is a private road, and a PROW through a field leading to the proposed settlement.</p> <p>It should first be acknowledged that Tonbridge is well within a reasonable cycling distance of the proposed site at Tudeley Village. It is approximately a 2-mile cycle to the eastern edge of Tonbridge which is well within the 5-mile cycle distance that LTN1/20 states would be an achievable distance to cycle for most people. Furthermore, the route is almost flat, therefore eminently suitable in terms of topography.</p> <p>Inclement weather is not a real concern when it comes to the likelihood of people cycling. People all across the country cycle for work and leisure in inclement weather and invest in appropriate all-weather gear to get them to their destinations as dry and as safely as possible. In terms of cycling in the darker, winter months, our colleagues have advised us that this can be dealt with using low level, ecologically sensitive route lighting. An ecological assessment would be needed to determine the right sort of lighting, but it is considered likely something appropriate can be found. They indicated that often in sensitive areas red lighting can be used as it disturbs the ecology less. There may also be options to screen the lighting or use lighting which adjusts its brightness (i.e. the lighting is brighter at peak times when people are more likely to be cycling but dims late in the evening/early morning when people are more likely to be at home).</p> <p>Isolation and lack of passive surveillance is an issue that is more difficult to overcome. To make the route feel safer it would ideally need to be lit with escape points available along the route. These escape routes would allow people to exit the cycle route onto a different route if they felt threatened or unsafe. It is noted that it would likely be difficult to provide escape routes along the route suggested within the LCWIP as there are no major roads nearby. Therefore, conditions relating to lighting, safety, isolation etc would need to be considered when estimating the mode share for cycling.</p> <p>Ideally, a rural cycleway would be located adjacent to a road to deal with issues relating to passive surveillance. However, it should also be pointed out that the Sustrans National Cycle Network contains lots of well used rural off-road cycle routes, despite them being unlit and isolated. It may be advantageous to try and compile a list of relevant examples that would support the implementation of the cycleway.</p> <p>Something else that should be considered, that was not raised by the Inspector but could impact the deliverability of the scheme, is how permission to convert the PROWs to a cycleway is obtained. To provide the upgrades, landowner permission will be required. It would take only one landowner to refuse permission for the scheme to become undeliverable. However, we understand that the land on which the cycleway would be provided is wholly within the ownership of the promoter. This would need to be verified and confirmed in submissions. It may be that further involvement by Phil Jones Associates would be advantageous. It also may be useful to meet with the KCC Public Right of Way Officer to understand whether they can assist with these matters.</p> <p>Given the commentary above, Stantec believe that a Technical Note supported by concept plans would need to be produced to address these points. This would need to explain how the Inspector's concerns can be addressed and set out</p>	<p>It is recommended that a Technical Note is produced to rebut the Inspectors concerns. This would address:</p> <ul style="list-style-type: none"> • Route lighting • Route surface / makeup • Security, escape routes • Examples of other schemes <p>It is also recommended that a meeting is had with the KCC Public Right of Way Officer to understand whether they can assist with a way forward for cycling between Tudeley Village and Tonbridge. This would also provide clarity on any third-party ownership that could cause a barrier to delivery of identified routes.</p> <p>See the full recommended scope of work in Chapter 3 of this report.</p>

Inspector's Concern	Commentary	Recommendation/Action
	<p>the proposals in greater detail. It could also include examples on where schemes of a similar nature have been successfully implemented. It should be noted that Active Travel England are currently working on design guidance for rural cycle routes</p> <p>This concern has been classified as Amber as Stantec believe additional evidence will need to be submitted to the Inspector.</p>	
<p>Collaboration with Tonbridge and Malling Borough Council</p> <p><i>“14. Cycling and pedestrian links would also extend beyond the plan area. In order to be effective, they would therefore need to be agreed with Tonbridge & Malling Borough Council as part of a wider strategy. Paragraph 106 of the Framework requires planning policies to be prepared with the active involvement of local highways authorities and neighbouring councils so that strategies and investments for supporting sustainable transport and development can be aligned. The neighbouring authority confirms that promoting walking and cycling would require a joined-up approach with projects in their borough, which are still at an early stage.”</i></p>	<p>Stantec understand that conversations are ongoing between Tunbridge Wells Borough Council (TWBC), Tonbridge and Malling Borough Council (TMBC) and Kent County Council (KCC) on cycling and pedestrian links. It is understood that this matter is being addressed by TWBC. While greatest effectiveness would be achieved via integrated schemes between the Councils, in practice it is common for plan programmes to not fully align, requiring assumptions to be made on future links or supplementary measures. TMBC should continue to have the opportunity to advise on reasonable assumptions and to input to the design process, at the same time noting that, in this case, an overview function is provided by KCC as the local transport authority.</p> <p>It should be noted that TMBC are currently in the process of preparing the baseline models for their new Local Plan using the new Kent traffic model. It is understood that any modelling work completed by TMBC will be shared with TWBC to seek agreement on any mitigation proposals. However, it should also be noted this work is unlikely to be completed within the timeframes for the TWBC Local Plan, meaning its use in relation to the TWBC Local Plan may be limited.</p>	<p>It is recommended that TWBC continues discussions with TMBC and KCC to explore options to improve cycle links into Tonbridge town centre.</p>

2.2 Public Transport

Inspector's Concern	Commentary	Recommendation/Action
<p>Bus enhancements</p> <p><i>"15. The railway line between Tonbridge and Paddock Wood divides the site yet no new station is proposed. This could have provided an opportunity to access higher order services easily and quickly by public transport and reduce the reliance on private car journeys. In the absence of any rail links, potential future residents would be reliant on buses as an alternative to the car. Again, this could be a policy requirement in the Plan. However, at the hearing sessions it was confirmed that discussions are still ongoing with bus providers and Kent County Council. Even if private services were provided, it would still require some collaboration with Tonbridge & Malling Borough Council in order to be effective. It therefore remains unclear precisely what would be feasible and whether it would offer a genuine alternative to the private car."</i></p>	<p>In paragraph 15 of the Inspector's initial findings, the Inspector highlights that residents would have to rely on buses as an alternative to the private car, but they are concerned that TWBC have not demonstrated what sort of bus enhancements would be feasible in order to make bus a genuine alternative to the private car. Stantec is aware that the WSP Bus Report was not available as evidence at the summer 2022 Examination in Public (EiP) sessions.</p> <p>Stantec is aware that TWBC have been working with KCC and WSP to produce a Bus Study. Stantec have analysed the draft version of this note, which was produced in February 2023. This presents four options for upgrading the bus network on the Paddock Wood to Tonbridge corridor, the Paddock Wood to Tunbridge Wells corridor and the Tonbridge to Tunbridge Wells corridor. This looks at enhancing bus services in accordance with 'Bus Rapid Transport' characteristics. When looking at operational cost vs revenue through housing development, Option 1 is the only option that becomes self-sustaining within the first 5 years when assuming a moderate bus mode share of 5%. All other options would take 5-10 years at a bus mode share of 5%. It is noted that more optimistic scenarios, where bus mode shares of 10% and 15% are realised, all four options could become self-sustaining within the first 5 years. It is noted that the Stantec Access and Movement Report assumed that the Tudeley and Paddock Wood developments would be planned to maximise use of sustainable transport modes and lead to significant increases in bus mode share, targeting 7%-10%, plus feeder traffic from the 18.9% who would be catching the train.</p> <p>Option 1 in the Bus Feasibility Technical Note would see the frequency of the existing 205 service, which routes between Paddock Wood and Tonbridge via Tudeley on the B2017, upgraded from 1 per hour per direction to 2 per hour per direction, alongside upgrades to the 6 and the 218/219 services. WSP estimate that Option 1 would cost around £7.8 million of support over five years for it to become sustainable based on a static operational cost set at the highest level. This is more than the £4.5 million available over the same period from developer contributions as set out in the Stantec Access and Movement Report (which would need to be checked against potentially later information/assumptions made by DLA).</p> <p>Option 2 would see the 205 service (at 2 per hour per direction) supplemented by a new 'Blue' service, at a further 2 services per hour per direction running between Tunbridge Wells, Paddock Wood, Tudeley and Tonbridge. The commentary in the WSP Note focuses on Option 1, but it would be useful to know from WSP how much developer funding Option 2 would require to become viable over 5 years, with a bus/rail feeder mode share of up to 25-30%. Assuming double decker buses with a capacity of c.100 passengers per vehicles, this would give a total capacity per hour of 400 passengers per hour per direction, therefore meeting the potential bus and rail feeder demand set out in the Stantec Access and Movement Report.</p> <p>The study concludes that the proposed level of development across the TWBC area will support significant expansion of the local bus service network, and that credible and viable options for public transport enhancements are available that will be able to support the development coming forward.</p> <p>Stantec believe that the majority of the work needed to address the Inspector's concerns on bus travel, and the plausibility of it being a genuine alternative to the private car, has already been completed by WSP. As stated in the WSP note, further work will be needed to shortlist the new bus priority measures and bus network improvement options, but overall Stantec believe enough work has been done at this stage to demonstrate to the Inspector that credible bus enhancements are available. Therefore, the work done by WSP to date should be submitted to the Inspector.</p> <p>This concern has been classified as green* as a substantial amount of work has already been completed by WSP on bus feasibility and how the bus network in Tunbridge Wells could be upgraded to make bus travel an attractive alternative to the private car. The work by WSP should be submitted to the Inspector alongside a further Technical Note.</p> <p>[* For clarity, the viability of infrastructure improvements lies outside the scope of this assessment.]</p>	<p>It is recommended that the WSP Bus Study is submitted to the Inspector as additional evidence alongside a Technical Note summarising its impact on other reports.</p> <p>It is recommended discussions are had with WSP and KCC on Bus Option 2 costs and assumptions.</p> <p>See the full recommended scope of work in Chapter 3 of this report.</p>

2.3 Congestion and Traffic

Inspector's Concern	Commentary	Recommendation/Action
<p>Congestion in Tonbridge Town Centre</p> <p><i>"21. In summary, the evidence demonstrates that existing traffic volumes and limited capacity cause congestion in Tonbridge town centre. Local Plan growth will add traffic to these junctions, causing negative impacts on their operation. This substantiates the concerns raised by Tonbridge & Malling Borough Council and local residents.</i></p> <p><i>22. The issue with the soundness of the Plan is that, unlike some other junctions (which can be altered to mitigate harmful impacts), the space to provide any mitigation in Tonbridge town centre is limited. Suggested ways forward include traffic management and encouraging "significant modal shift". However, as identified above, details of the public transport improvements that could be provided are still at an early stage and it is not possible to establish whether they would genuinely achieve any significant modal shift."</i></p>	<p>At the hearing for the Examination, TMBC claimed that the traffic modelling completed by Sweco demonstrated that Tonbridge town centre is congested and has limited capacity to cope with additional traffic. At the hearing, Sweco argued that TMBCs claim was without basis but none the less we believe this is why the comments relating to traffic and capacity in paragraph 22 of the findings have arisen.</p> <p>It is understood that discussions have been had between TWBC, TMBC and KCC, which Stantec have not been party to, on the potential traffic impacts on Tonbridge town centre. Within these discussions, Stantec have been informed that TMBC expressed that they were not adequately satisfied that congestion will not be an issue in Tonbridge town centre. Stantec believe that if TMBC cannot be convinced that the TWBC Local Plan and the allocation of Tudeley Village will not have negative impacts on Tonbridge Town Centre then there is a real risk that additional modelling will need to be undertaken which could cause significant delay to the progression of the Examination process. It is understood that TMBC are currently preparing the baseline traffic model for their Local Plan, using the new Kent traffic model, but at the current time they have not provided any evidence that there would be a severe residual traffic impact on Tonbridge town centre. It is also unlikely this work will be completed within the timeframes for the TWBC Local Plan, meaning its use in relation to the TWBC Local Plan may be limited.</p> <p>It is Stantec's opinion that the TMBCs comment at the time of the EiP session was made with a 'Predict and Provide' approach to planning in mind rather than a 'Vision and Validate' and 'Monitor and Manage' approach. The Plan should be looking to promote sustainable travel ahead of any highway mitigation in accordance with the NPPF and the DfT Circular 01/22. The DfT Circular 01/22 was adopted in January 2023 and it is Stantec's opinion, discussed with KCC who acknowledged the new Circular change, that comments relating to capacity and mitigation in Tonbridge town centre are now out of step with this Circular, which states that new development should be facilitating a reduction in the need to travel by private car and that alternative measures to reduce traffic impact should be considered before capacity enhancements.</p> <p>Stantec would suggest it would be advantageous to introduce the DfT Circular 01/22 into the examination process as it could potentially help support the Local Plan strategic site allocations. Following conversations with Officers at TWBC, it has been suggested that a short Technical Note summarising any policy changes that have arisen since in the EiP last summer and the impact this would have on the approach to the Local Plan is produced. This would include the DfT Circular 01/22 and the appointment of Active Travel England as a statutory consultee to all major planning applications from June 2023.</p> <p>In relation to responding to TMBC, it is suggested a meeting is held between TWBC, Stantec and Sweco to determine the best way forward. This could involve Sweco undertaking additional work. The additional work undertaken on cycling and public transport should also help to ease concerns relating to traffic and capacity, as it shows genuine alternatives to travel by private car will be available.</p> <p>This concern has been classified as amber as the objections raised by TMBC in relation to TWBC Local Plan and the Tudeley village allocation will likely need additional evidence to be produced for the concern to be overcome, however it is judged that Circular 01/2022 corroborates the TWBC approach and will assist the process going forward.</p>	<p>It is recommended that TWBC continue discussions with TMBC and KCC Highways and that assumptions for further modelling work are reviewed and agreed.</p> <p>It is recommended that a Technical Note detailing policy changes since the EiP last summer is produced and that the DfT Circular 01/22 be submitted to the examination.</p> <p>It is recommended that a meeting is had between TWBC, Stantec and Sweco to determine the best way forward/next steps.</p>

2.4 Five Oak Green Bypass

Inspector's Concern	Commentary	Recommendation/Action
<p>Air quality concerns outside Capel Primary School</p> <p><i>"26. From discussions at the hearings there are three main concerns with this part of the Plan. Firstly, the bypass is to be accessed from a new junction almost directly opposite Capel Primary School. At the hearings the Council confirmed that no detailed consideration had yet been given to the appropriateness of this location having regard to issues such as air quality, road and pedestrian safety and noise. They are all important considerations."</i></p>	<p>In paragraph 26 of the Inspector's initial findings, the Inspector raised concerns about the proposed roundabout opposite Capel Primary School that will be used to access the promoted Five Oak Green Bypass. One of these concerns relates to air quality.</p> <p>Stantec have sought advice from air quality colleagues on this concern raised by the Inspector. They believe that the positioning of a roundabout outside a school is unlikely to have any direct impact on pupils in terms of air quality. The roundabout will re-locate the carriageway and therefore the cars marginally further away from the school and planting could be used to help shield the school from air quality effects.</p> <p>However, there is a wider air quality issue that may need to be considered. The new developments at both Tudeley and Paddock Wood are likely to generate more traffic along either Five Oak Green Road or the proposed bypass and anything that increases traffic/congestion directly outside a school could potentially have a detrimental impact on air quality for pupils. Conversely, if you assume most of the pupils that attend Capel Primary School live in Five Oak Green, then if the bypass comes forward and removes a substantial amount of traffic from the road through the village, this will reduce the pupil's exposure to poor air quality while at home, meaning the overall change impact pupil exposure is negligible.</p> <p>Stantec believe that the Inspector's concern regarding air quality has merit and additional work would be recommended to ease this concern. Although without detailed modelling it is difficult to robustly know what the air quality impact is likely to be, it is likely to be well below legal limits. At this stage, Stantec would suggest a high-level air quality assessment is undertaken that looks at the impact of the strategic sites on the village of Five Oak Green and Capel Primary School, using the Sweco traffic data. This, it is hoped, should be able to provide comfort to the Inspector.</p> <p>This concern has been classified as amber as Stantec believe the Inspector's concern has merit, which would require additional work to be undertaken to address the concern.</p>	<p>It is recommended that a qualified air quality consultant is commissioned to undertake a high-level air quality assessment of the school proximity.</p>
<p>Noise concerns outside Capel Primary School</p> <p><i>"26. From discussions at the hearings there are three main concerns with this part of the Plan. Firstly, the bypass is to be accessed from a new junction almost directly opposite Capel Primary School. At the hearings the Council confirmed that no detailed consideration had yet been given to the appropriateness of this location having regard to issues such as air quality, road and pedestrian safety and noise. They are all important considerations."</i></p>	<p>In paragraph 26 of the Inspectors initial findings, the Inspector raised concerns about the proposed roundabout opposite Capel Primary School that will be used to access the Five Oak Green Bypass. One of these concerns relates to noise.</p> <p>Stantec have sought advice from colleagues who specialise in acoustics. They believe that positioning a roundabout outside a school is unlikely to have any adverse noise impacts on pupils.</p> <p>However, there is a wider noise issue that may need to be considered. The new developments at both Tudeley and Paddock Wood are likely to generate more traffic along either Five Oak Green Road or the proposed bypass and, similarly, to air quality, anything that increases traffic/congestion directly outside a school will result in a greater noise impact.</p> <p>Stantec believe that the Inspector's concern regarding noise has merit and additional work may be needed to ease this concern. At this stage, Stantec would suggest a high-level noise assessment is undertaken that looks at the impact of the strategic sites on the village of Five Oak Green and Capel Primary School, using the Sweco traffic data. This should provide comfort to the Inspector and recommend mitigation measures to reduce any impacts.</p> <p>This concern has been classified as amber as Stantec believe the Inspector's concern is valid and additional work will need to be undertaken to address the concern.</p>	<p>It is recommended that a qualified acoustician is commissioned to undertake a high-level noise assessment.</p>

Inspector's Concern	Commentary	Recommendation/Action
<p>Road and pedestrian safety concerns outside Capel Primary School</p> <p><i>“26. From discussions at the hearings there are three main concerns with this part of the Plan. Firstly, the bypass is to be accessed from a new junction almost directly opposite Capel Primary School. At the hearings the Council confirmed that no detailed consideration had yet been given to the appropriateness of this location having regard to issues such as air quality, road and pedestrian safety and noise. They are all important considerations.”</i></p>	<p>In paragraph 26 of the Inspector's initial findings, the Inspector raised concerns about the proposed roundabout opposite Capel Primary School that will be used to access the Five Oak Green Bypass. One of these concerns relates to road and pedestrian safety.</p> <p>Stantec have briefly spoken to one of their own internal road safety auditors and shown them the proposed roundabout outside Capel Primary School. They do not believe that the scheme would pose any significant issues in relation to road or pedestrian safety. The scheme may even provide some benefits to the school. For example, Capel Primary School sits within a 30mph speed limit but the nature of the road (wide and straight with no traffic calming and limited built frontage) means speeding can potentially be an issue, therefore the addition of the roundabout will help to slow traffic and help to improve road safety.</p> <p>There may also be the opportunity to provide a dedicated drop-off/pick-up car park for the school adjacent to the new bypass, bringing wider benefits to the school and community. This would be within a short walking distance of the school and would help to prevent the errant parking on Church Lane that currently takes place. Safe pedestrian crossing facilities would also be provided to ensure parents and children can safely cross from the car park to the school.</p> <p>Going forward Stantec would suggest a high-level road safety review is carried out by a qualified road safety auditor to address any safety concerns through potential further recommendations.</p> <p>This concern has been classified as amber as Stantec believe the Inspector's concern is valid, but once additional work has been completed Stantec believe that road and pedestrian safety outside Capel Primary School should no longer be a concern.</p>	<p>It is recommended that a qualified road safety auditor is commissioned to review the roundabout scheme at a high level.</p>
<p>Deliverability of the Five Oak Green Bypass</p> <p><i>“28. Thirdly, there remains uncertainty about the funding, phasing and deliverability of the road. At the hearings, it was suggested by the council that changes are required to the submitted Plan because only the Tudeley allocation needs to contribute to it. But without the bypass, presumably some residents of the nearly 3,500 new homes proposed at Paddock Wood will pass through Five Oak Green?”</i></p> <p><i>The hearings also flagged uncertainty about when the by-pass would need to be built and what implications this would have on safety within the village. Finally, and crucially, building the road would require land in multiple ownerships. Although the Council is optimistic about the use of compulsory purchase orders, this process adds to the complexity, cost, timescales and general uncertainty of its deliverability.</i></p>	<p>In paragraphs 28 and 29 of the Inspector's initial findings, the Inspector raised concerns about the funding, phasing and deliverability of the Five Oak Green bypass and what would happen in Five Oak Green if the bypass wasn't delivered.</p> <p>To prevent an unacceptable level of traffic travelling through Five Oak Green, traffic calming measures could be implemented in the village to deter anyone other than residents using this route to travel between Paddock Wood and Tonbridge. The idea would be to encourage people travelling from Paddock Wood to Tonbridge to travel down the A228 and then up the A21.</p> <p>Stantec cannot comment on the funding, phasing and deliverability. The purpose of this RAG Assessment is to consider the impact of the Five Oak Green bypass. The delivery of the scheme and compulsory purchase orders are separate matters which will be dealt with separately by TWBC and their relevant consultants.</p>	<p>TBC.</p>

Inspector's Concern	Commentary	Recommendation/Action
<p>Landscape and Visual Impact:</p> <p>"27. Secondly, only limited information has been provided to consider the visual impact of a new road in this location. This is especially important when considering the topography of the area, the need for a crossing over the Alder Stream, heritage and the proximity of the road to the AONB. The AONB Setting Analysis Report found that the high ground to the south of Tudeley contributes most to the setting of the AONB because it has the highest intervisibility and forms a transition from the lower ground further north. Significant engineering works, significant increases in traffic volumes, light and noise are all identified as factors which may harm the setting of the AONB. All are probable as part of the development of a new bypass. Without proper consideration of these issues, it is therefore not possible to determine the likely suitability of the scheme. It would also require additional development in the Green Belt and in areas at risk of flooding.</p>	<p>Key landscape and visual issues are identified below based on desktop analysis. The landscape and visual impact RAG assessment in relation to the Tudeley Village site allocation as part of the Local Plan Examination, is Red for Landscape and Visual Impact, but noting that the proposed Bypass route alignment can be reviewed as noted below.</p> <p>The desktop review has highlighted environmental sensitivities and constraints upon the route for the proposed Five Oak Green Bypass, and the potential for significant landscape and visual effects which could remain after mitigation. It is therefore strongly recommended that the Five Oak Green Bypass route alignment / design is revisited and reviewed against potential environmental effects, including those upon the setting of the High Weald Area of Outstanding Natural Beauty (HWAONB), and other landscape and visual receptors, to avoid and minimise adverse environmental effects as far as practicable, and which provides maximum opportunity for effective mitigation to reduce significant adverse effects. Relevant environmental topics, in addition to landscape and visual, which are recommended for the Environmental Review and to inform the route alignment include: ecology / biodiversity, heritage, arboriculture and hydrology. To inform the review, it is recommended that a Preliminary Landscape and Visual Impact Assessment (LVIA) supported by Concept Environmental Mitigation Design is prepared and which would provide evidence for the selection of the final Bypass alignment.</p> <p>.</p> <p>Setting of the High Weald Area of Outstanding Natural Beauty (HWAONB) (AONB Setting Analysis Report (tunbridgewells.gov.uk)): Alders Road forms the northern boundary of the HWAONB and is to the south of the Site. People who enjoy the visual amenity and views of the HWAONB from its setting are its visual receptors. These visual receptors have a high visual sensitivity. There are potential visual impacts upon people living in and working in the AONB's setting, and people visiting the AONB. The HWAONB Setting Report did not specifically consider the potential bypass route. However, comment was made about the landscape between the boundary of the HWAONB at the B2017 and the railway line to the north, stating that this area is, "...a transitional landscape between the high and low weald."</p> <p>Mitigation will be required: for example, consideration of final alignment and evidence that it causes least harm will be required, considering cut fill / using false cuttings, potentially wider land take to provide topography tie in, new landscape infrastructure/screening and to avoid tall bridge structures, and provision of landscape planting that is in keeping with local landscape character of the site and the surrounding area (e.g. linear tree planting and small corner copses). It is anticipated that appropriate mitigation would reduce the residual magnitude of adverse effects, but there is the potential that significant adverse effects will remain after mitigation upon the setting of the HWAONB.</p> <p>Listed Buildings: Several Listed Buildings are in proximity to the proposed bypass route (closest within c.100m), and the setting of the Listed Buildings would be of high sensitivity. Potential for adverse effects on the setting of the Listed Buildings (note that separate heritage assessment will be required to determine heritage impacts), subject to historic purposes, and visual association and intervisibility with their surrounding landscape. Mitigation potentially required e.g. through landscape planting appropriate to heritage setting and local landscape character. Appropriate mitigation is anticipated to reduce magnitude of effects, and there is potential for significant effects on the setting of Listed Buildings, in the long term, to reduce to not significant after mitigation.</p> <p>Landscape features and ecology: Streams and watercourses, copses, trees and hedgerows would be of high to medium sensitivity, and Ancient Woodland would be high sensitivity as landscape receptors but would also be important features for ecology. As a result of the current alignment, there would be direct landscape and ecological impacts arising upon the streams / watercourses, and from losses of trees and hedgerows, some effects are likely significant. It is noted that the current route appears to clip, or is adjacent to, the northern end of Ancient Woodland; any loss of Ancient Woodland would be a significant adverse landscape effect. Mitigation required: e.g. avoid loss of Ancient Woodland (and its associated minimum 15m buffer) through design and alignment, minimise loss of stream habitats, minimise loss of trees and other vegetation, potentially wider land take to provide topography tie in</p>	<p>It is recommended that the Five Oak Green Bypass route alignment is revisited and reviewed against potential environmental effects, including those upon the setting of the High Weald Area of Outstanding Natural Beauty (HWAONB), and other landscape and visual receptors, to identify a route alignment which avoids adverse environmental effects as far as practicable, and which provides maximum opportunity for effective mitigation to reduce significant adverse effects.</p> <p>Relevant environmental topics, in addition to landscape and visual, which are recommended for the Preliminary Environmental Review and to inform the route alignment include: ecology / biodiversity, heritage, arboriculture and hydrology.</p> <p>It is recommended that a Preliminary Landscape and Visual Impact Assessment (LVIA), including Zone of Theoretical Visibility plan, and a Concept Environmental Mitigation Design are prepared, and which would provide evidence for the selection of the final Bypass alignment and demonstrate the potential for reduction of significant landscape and visual effects. Consideration of necessary structures that would be required, such as bridges, should also be part of the Preliminary Environmental Review.</p> <p>It is recommended that TWBC engage with KCC PROW to understand their view on the impact the Five Oak Green Bypass may have on the surrounding PROW network.</p>

Inspector's Concern	Commentary	Recommendation/Action
	<p>and avoid tall bridge structures, utilise cut fill / use false cuttings, improved layout and multifunction of attenuation ponds to achieve degree of fit in the landscape, replacement planting and habitat creation. Links also to hydrology mitigation, ecology and biodiversity net gain and mitigation. There is potential in the long term for significant landscape and visual effects to reduce to being not significant after appropriate mitigation and a wider land take offers scope for Biodiversity Net Gain.</p> <p>Landscape Character and Historic Landscape Character: there would be landscape impacts on the local landscape character of the site and adjacent land, including historic landscape and the change in use would result in significant adverse landscape character effects. Potential for impacts on adjoining landscape character and historic landscape character areas, including landscape character areas of the AONB, but subject to intervisibility.</p> <p>Mitigation required: utilise cut fill / use false cuttings, potentially wider land take to provide topography tie in, improved layout and multifunction of attenuation ponds to achieve degree of fit in the landscape, and provision of landscape planting that is in keeping with local landscape character of the site and adjacent area (e.g. linear tree planting and small corner copses). Appropriate mitigation would be anticipated to reduce magnitude of effects and there is potential for significant landscape and visual effects to reduce to being not significant.</p> <p>Public Rights of Way (PROW) network inc. those PROWs crossing both segments of the bypass route, PROWs on rising land to the south in the HWAONB and PROWs along the valley floor / along stream. PROWs that would be directly affected by the Bypass would have medium to high landscape sensitivity, and people's views from PROWs would be of high or medium visual sensitivity dependent on the visual context and visual relationship of the Bypass with the HWAONB in the view. Some landscape and visual effects on PROWs and users of PROWs are likely significant. Mitigation required: maintain the PROW routes and provision of PROW crossings that are sensitively designed to have a degree of fit in the landscape, potentially wider land take to provide topography tie in and avoid tall bridge structures, utilise cut fill / use false cuttings, and provision of landscape planting that is in keeping with local landscape character of the site and adjacent area (e.g. linear tree planting and small corner copses), but maintaining visual links with the AONB as appropriate. Mitigation would be anticipated to reduce magnitude of effects and there is potential for significant landscape and visual effects to reduce to being not significant. Some visual effects upon people's views from PROWs are likely to remain significant and adverse but improvements to the wider PROW networks could be made. It is advisable that TWBC engage with the KCC PROW team to understand their view on the impact the bypass will have on the surrounding PROW network.</p> <p>People's views from local roads, dwellings and edge of settlements: the extent of visibility of the proposed Bypass and thus the level of effect upon people's views from local roads, dwellings and edges of settlements depends on the nature of the landform and intervening vegetation between the Bypass and the visual receptors. It is not possible to determine that through desktop analysis alone. However, it is anticipated that sensitivity of people's views from local roads, dwellings and edge of settlement would range from low to high sensitivity. It is anticipated that some visual effects would be likely to be significant and adverse. Mitigation required: potentially wider land take to provide topography tie in and avoid tall bridge structures, utilise cut fill / use false cuttings, and provision of landscape planting that is in keeping with local landscape character of the site and adjacent area (e.g. linear tree planting and small corner copses), but maintaining visual links with the AONB as appropriate. Mitigation is anticipated to reduce the magnitude of visual effects and there is potential in the long term for some significant visual effects upon views from local roads, dwellings and edge of settlement to reduce to being not significant.</p>	