



Our ref: #8633

Your ref:

Local Plan Team  
Planning Services  
Tunbridge Wells Borough Council

Highways England  
Bridge House,  
1 Walnut Tree Close,  
Guildford GU1 4LZ

Direct Line:  
Email:

**By email**

[localplan@tunbridgewells.gov.uk](mailto:localplan@tunbridgewells.gov.uk)

14 November 2019

Dear Sir/Madam,

**TUNBRIDGE WELLS BOROUGH COUNCIL**

**Regulation 18 Consultation: TUNBRIDGE WELLS DRAFT LOCAL PLAN (2019)**

Thank you for consulting Highways England regarding the above, seeking a response no later than 15 November.

**Background**

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with plans and/or proposals that have the potential to impact the safe and efficient operation of the SRN, in this case, particularly the A21.

Our primary concern, therefore, is the impact of proposed developments described in the Draft Local Plan (DLP) on the A21 trunk road. Several key junctions within or beyond the Draft Local Plan area currently experience congestion during both AM/PM peak periods. Therefore, future development proposals that would impact the SRN network would need to be robustly assessed and mitigated via the appropriate channels.

Highways England has recently completed the dualling the A21 carriageway between Tonbridge and Pembury. This work was undertaken between 2015-2017, and saw improvements to relieve congestion, maintain safety upon the SRN and maintain journey time. At present, Highways England is currently working with its local service provider, AOne+, to development a standalone scheme of enhancements at Flimwell Crossroads, with details likely to become available late 2019/early 2020. There are no other identified improvement works at this time on the A21.

Current traffic levels during the AM (08:00-09:00) and PM (17:00-18:00) Peak periods on the A21 indicate that there are a number of junctions which have congestions issues. These include Kippings Cross, Lamberhurst, Longfield Road, Pembury Road, Mabledon and, beyond the borough boundary, Flimwell.

We therefore strongly advise that the emphasis within the Draft Local Plan should be placed upon reducing the need to travel and, where travel is necessary, to use more sustainable modes rather than relying on improvements being in place.

Any necessary improvements required as a result of proposed development would need to be identified, designed, managed and fully funded via the individual proposals or via a Local Plan mechanism.

Based upon the above, we have the following comments to make with regards various consultation documents:

**Draft Local Plan**

	<b>LP Ref</b>	<b>Highways England Comment</b>
LP1	Whole Plan	<p>Highways England welcomes the opportunity to provide comments and notes the Duty to Co-operate discussions that have been held to date.</p> <p>Within the Draft Local Plan (eg para 1.42), any reference to the Highways Agency should be changed to Highways England.</p>
LP2	Whole Plan	<p>In supporting and considering draft local plans, Highways England will seek to influence the scale and patterns of development so that it is planned in a manner which makes best use of capacity on the SRN and will not compromise the fulfilment of the primary function of the SRN. Ideally, development locations should be chosen that would minimise travel and facilitate the use of sustainable transport.</p> <p>Highways England will work with local planning and highways authorities to ensure that local plans and other relevant development plan documents are underpinned by a robust transport evidence base which fully assesses the transport implications of the growth options being considered. This will include two key assessments:</p> <ul style="list-style-type: none"> <li>• the individual and cumulative impacts of the authority’s policies and proposals upon the ability of the road links and junctions on the affected parts of the SRN to accommodate the forecast traffic flows in terms of capacity, safety and cumulative environmental effects; and</li> <li>• the interactions between the strategic and local road networks.</li> </ul> <p>We will input to this work where we are able to, as well as share evidence that we have, and input our knowledge and experience of the network.</p>
LP3	Transport (Section 2 – Challenges and Opportunities)	<p>It is noted at paragraph 2.23 that Tunbridge Wells Borough faces “<i>significant transport challenges, particularly in terms of managing existing congestion and future growth</i>”, and while the focus of the Draft Local Plan is to ensure that both active travel and sustainable modes of transport are provided, there exists a need to balance the rural regions and private vehicle as the preferred mode of transport. Highways England accepts that inevitably, mode shift in rural regions is difficult without access to good sustainable transport options and that there will be a requirement to plan for vehicles (para 2.27).</p>
LP4	Transport (Section 2 –	<p>Highways England would strongly encourage all parties to engage with us at an early stage on all planning matters (plans/ applications) that might have an</p>

	Challenges and Opportunities)	<p>impact on the SRN. We are committed to working with local planning/ highway authorities, applicants, other statutory consultees and infrastructure providers recognising that we have a responsibility to support and develop a more coordinated approach to planning with regards the SRN and the local highway network.</p> <p>It may, therefore, be helpful to include text somewhere in the plan covering applicants' need to engage with Highways England. Such text could usefully refer to the need for any developer of a site that by virtue of its location or traffic generation may affect the safety or operation of the strategic road network to provide robust evidence regarding the impacts and, as appropriate, to mitigate them. Any SRN mitigation is likely to be agreed and delivered via the use of S278 agreements under the Highways Act, rather than via S106 or CIL. A cross reference to national transport policy and Highways England guidance would also assist.</p> <p>This would work well in conjunction with paragraph 2.24, that highlights the need for the infrastructure planning process to identify certain issues as part of a robust and credible evidence base. The process should outline what infrastructure is needed (e.g. public transport measures, cycle lanes with road building as a last resort) to enable the delivery of all the DLP development and also detail the associated costs, sources of funding, timescales for delivery and gaps in funding.</p> <p>It should also cross reference to the text on Transport Assessment and Travel Plans Section 6.</p> <p>Similar text and cross references should also be included in the IDP.</p>
LP5	Vision and Objectives (Section 3)	<p>Vision Statement 1 (Para 3.2) indicates that <i>at the heart of all development in the borough will be connectivity, active travel...</i>but makes no mention of sustainable travel options as a guiding principle. Highways England would recommend the rewording as follows: <i>at the heart of all development in the borough will be connectivity, sustainable and active travel...</i>, to accord with guidance found within the NPPF.</p> <p>Vision and Objectives 2 (Para 3.4) also makes no mention of sustainable travel, particularly within the sub-statement 3 which states: <i>To prioritise active travel, but where necessary to plan appropriately for use by private motor vehicle, in particular embracing new technology.</i> While Highways England welcomes the move towards new technology, improvements within the public transport realms (such as Real Time Passenger Information, on-site bus service mobile apps) would also promote mode-shift away from private vehicles onto sustainable transport modes.</p>
LP6	Policy STR 6 (Transport and Parking) Transport (Section 4 – Strategic Policies)	<p>Highways England notes that <i>'Traffic and car parking will be carefully managed through developing innovative strategies that will both provide a sufficient level of parking in the borough as well as encourage sustainable travel'</i>. In order to minimise the impact of additional development on the already congested SRN, it is vital to avoid an over-provision of car parking spaces. An oversupply of parking is likely to limit the effectiveness of demand management measures, which, in accordance with the NPPF and local policies, are important in encouraging a reduction in travel and the use of sustainable modes. Consequently, in accessible locations the Council should seek to reduce the number of car parking spaces where appropriate and to encourage the provision and use of sustainable transport modes.</p>
LP7	Place Shaping Policies (Section 5)	<p>In a separate table below, we have provided a high level assessment of the allocated sites; although this is subject to the outcome of the local plan modelling and the Transport Assessment/Statement produced as part of any subsequent application.</p>

		With regards, smaller sites, these too are likely to require TAs/TS' that we will be consulted on in due course.
LP8	Development Management Policies (Section 6)	The DLP provides a comprehensive list of design guidance the Council will have regard to (para 6.14) but does not refer to the various design guidance relevant to roads such as the Design Manual for Roads and Bridges and the Manual for Streets. This should be rectified for completeness and cross reference to similar text at para 6.512.
LP9	Para 6.511	<p>This paragraph addresses the issue of cumulative development and states: <i>Where appropriate, new development proposals will be expected to enter into legal agreements to secure the delivery of mitigation to address both their direct and cumulative impacts on the transport network.</i></p> <p>This needs to be combined with text emphasising that as part of all submitted Transport Assessments or Transport Statements, the cumulative impact of both proposed and programmed development is assessed, and as necessary supported by WebTAG compliant modelling work.</p>
LP10	Policy EN-9 Advertisements	For completeness the supporting text should cross reference to DfT Circular 02/2013 that contains guidance regarding advertising along, or visible from, the SRN.
LP11	Policy EN29 Sustainable Drainage Systems	<p>Policy EN 29 states that the DLP will <i>'ensure that surface water runoff is managed as close to its source as possible and....3. Discharge to a surface water sewer, highway drain, or other drainage system.'</i></p> <p>DfT C2/13 para 55 states that <i>' Water run-off that may arise due to any change of land use will not be accepted into the highway drainage systems, and there shall be no new connections into those systems from third party development or drainage systems. The DMRB should be consulted further in such cases'</i>.</p> <p>Therefore, policy EN29 should be amended to reflect national policy regarding the strategic road network.</p>
LP11	Policy ED 1 Key Employment Areas	<p>Any new employment area is likely to generate trips on the network and should be located in areas where sustainable transport and active transport options are the primary mode choice.</p> <p>However, large number of employment sites, specifically within the B8 category can be predominantly vehicle based. Therefore, as well as providing a full transport assessment, a route distribution assessment will be required. This requirement should included in policy/text as appropriate.</p> <p>It should also be noted that parcel delivery companies have been found to generate up to 6 to 8 times as much traffic (staff/ deliveries) as other B8 uses. Consequently, until such time as the full impacts and appropriate mitigations of this particular sector are more widely understood and agreed, Highways England recommends that policy and text explicitly states that any applications for this type of use will be dealt with on their own merits and are not considered automatically to be in accordance with the local plan.</p>

## Tunbridge Wells Draft Local Plan Strategic Sites: Highways England Comments

### East Site Allocations:

Location:	No/Type:	Distance to SRN:	Impact:	Current traffic flows:	Recommendations
<b>Frittenden</b>	25-30 residential dwellings (1 site)	<b>+15km</b> A21 / A299  <b>+20km</b> M20 J8	No / minimal impact	NA	NA
<b>Sissinghurst</b>	100-115 residential dwellings (5 sites)	<b>+15km</b> A21 / A299  <b>+25km</b> M20 J7/J8	No / minimal impact	NA	NA
<b>Cranbrook</b>	718-803 residential dwellings (9 sites) Some large developments proposed >100 dwellings Community uses, employment uses, playing fields and sports facilities Safeguarding land for future primary school expansion	<b>+12km</b> A21/A268	Some impact expected at the A21/A268 (Forstal Farm roundabout) – even though it is >10km from the sites, this is primary route for vehicles joining A21 northbound.	Current traffic levels show as reasonable at the A21/A268 roundabout during weekday AM and PM peak.	Given multiple proposals are for >100 dwellings, we recommend a full transport assessment accompanies proposal. TA should include junction modelling for A21/A268 roundabout.
<b>Benenden</b> (includes East End and Iden Green)	119 – 129 residential dwellings (4 sites) Allotments, parks, recreation grounds	<b>+12km</b> A21 / A299  <b>+ 16km</b> A21 / A262 roundabout  <b>~5km</b> A268	Minimal impact on SRN (>10km) and A268 (5km)	SRN (>10km) dispersion of traffic over different routes / junctions.  A268 lies 5km south of Benenden parish. Congestion issues at Hawkhurst and Flimwell along A268, but unlikely commuters from Benenden developments will use this route with other options	NA

				available to join the A21 northbound or southbound.	
<b>Hawkhurst</b>	<p>681-731 residential dwellings (7 sites) New GP surgery, community and recreational facilities Relief road to reduce congestion around A268 Rye Road/Cranbrook Road/Highgate Hill crossroads, as well as any impact on the Flimwell junction A21 and A268.</p> <p>19/02025/HYBRID Hawkhurst Golf Club -Largest site proposes 400-450 dwellings, care home, relief road, community centre, closure of northern arm of crossroads. Currently being considered.</p>	<p><b>+3km west</b> A21 A268 runs through Hawkhurst, borders the largest proposed development at Hawkhurst Golf Club.</p>	<p>Primary concern is impact to A21 Flimwell crossroads. Development at Hawkhurst will generate significant trips. Hawkhurst Golf Club development estimated +200 trips during AM and PM peak.</p>	<p>Current traffic information shows there is congestion at Flimwell crossroads during AM and PM peaks. Google traffic shows heavier traffic during PM peak, particularly slow on the A21 southbound carriageway.</p>	<p>Highway capacity improvements proposed to mitigate impact.</p> <p>TA submitted with 19/02025/HYBRID planning app mentions HE are currently working with A-one+ to development standalone scheme of enhancements to Flimwell Crossroads and that PRA will be identified Autumn 2019. Applicant welcomes opportunity to work with HE to deliver improvements.</p> <p>S106/S278 Agreement.</p>

### North Site Allocations:

Location:	No/Type:	Distance to SRN:	Impact:	Current traffic flows:	Recommendations
<b>Five Oak Green</b>	<p>The provision of either one 3 FE or two 2 FE primary schools within Tudeley Village and/or 1 FE expansion of the existing Capel primary school at Five Oak Green;</p> <p>No specific housing allocation but may be impacted by either Paddock Wood or Tudeley Development</p>	<p><b>6km</b> A21/ B2017/A228/ <i>Pembury Bypass</i> B2017</p>	<p>Bypass link for the A228 should help to alleviate traffic along the B2017.</p> <p>Main aim is to minimise impact upon Five Oak Green.</p>	<p>Slightly higher than normal traffic flows during the AM/PM peak that may be exacerbated by any further development at Paddock Wood or Tudeley;</p>	<p>Strategic transport links shall be provided between Tonbridge, Tudeley Village, the A228, Five Oak Green, Royal Tunbridge Wells/Southborough, and land at Capel and Paddock Wood and Paddock Wood Town Centre. To include the provision of an offline A228 strategic link. Links from Tudeley Village to the east should minimise the impact on the road network in the settlement of Five Oak Green.</p> <p>The exact location of such a link has not been determined;</p>
<b>Paddock Wood</b>	<p>Employment site and approximately 4,000 new homes on land at Capel and Paddock Wood, including a rejuvenated Paddock Wood town centre.</p> <p>Four new primary schools and expansion of Mascalls secondary school</p> <p>A new swimming pool, outdoor sports hub and a new community hall</p> <p>A new doctors surgery (either here or in Tudeley village)</p>	<p><b>6km</b> A21/B2160 (<i>Kippings Cross</i>), A228 (<i>Tonbridge Rd Rdbt</i>)</p> <p><b>~15km</b> M20 – J4/J5</p>	<p>Significant/ any movement along this route will need mitigation as traffic is already operation at higher levels during peak hour. Opportunity for railway station enhancement as on direct line to Tonbridge.</p>	<p>Majority of movement would be either direct towards A21; which indicates heavier traffic flows in the AM/PM peak at the A21/A228/B2160 junctions</p> <p>Movements northwards are likely to impact on M20 – J4 – which demonstrates a higher level of traffic in the PM period. J5 currently has a mitigation scheme in place and undergoing works.</p>	<p>Transport infrastructure to include the A228 Colts Hill bypass, a distributor road in the eastern part of Paddock Wood, and bus and cycle links from Paddock Wood to Tonbridge via Tudeley.</p> <p>Mitigations measures required for Kippings Cross/ Tonbridge Rod Roundabout; full modelling assessment.</p> <p>Trip distribution assessment onto M20.</p>

	Addition waste water treatment, and strategic sewerage provision				
<b>Tudeley</b>	<p>Residential garden village at Tudeley of up to 2,800 homes, to include employment and other facilities, including retail, community facilities etc</p> <p>It is anticipated that 1,900 of these homes will be built before 2036</p> <p>Two new secondary schools (between Tonbridge and Tudeley, and at Spratsbrook, south of Royal Tunbridge Wells)</p>	<p><b>2.5km</b> (West) A21/B2017/A26 (Pembury Rd Rdb)</p> <p><b>&gt;15km</b> M20 – J4, M26 – J2a or M20 – J4</p>	<p>Significant; given proximity to A21, this is the major route choice to onwards western destinations and any development along this route will need mitigation as traffic.</p> <p>Potential to provide railway station as on direct line to Tonbridge.</p>	<p>Current traffic flows for AM/PM peak hours are currently acceptable at the A21/A26 Pembury Road roundabout.</p>	<p>Local road network improvements for A228 (Colts Hill bypass).</p> <p>Eastern link from Tudeley Village to be considered.</p> <p>TA required with junction modelling and trip distribution for A21/A26 Pembury Rd Roundabout and further distribution onto M20 and M26.</p>

**West Site Allocations:**

Location:	No/Type:	Distance to SRN:	Impact:	Current traffic flows:	Recommendations
<p><b>Southborough</b></p>	<p>Approx 50-120 dwellings on allocated sites, plus 85 which already have planning permission.</p> <p>The Southborough Hub, a mixed used scheme to include approximately 69 residential dwellings, and including retail units, flexible community floor space, including for assembly and leisure uses, Town Council Offices, medical centre, new sports pavilion with ground maintenance store and workshop, and extension to the existing Yew Tree Road public car park. New, retail floorspace should enhance and diversify provision within Southborough, provided it is of an appropriate scale and will not have a significant adverse impact on the town.</p> <p>Any residential uses fronting onto London Road shall be located above ground floor.</p> <p>This site already has planning permission. Development is currently under construction</p>	<p><b>3km</b> <i>A21/A26 or via Longfield Road/ A21 Bypass/</i></p> <p><b>&gt;15km</b> M26/M25-J5</p>	<p>Significant; any development along this route will need mitigation on the local network as traffic is already operating at higher levels during peak hours directly into Tonbridge (south).</p> <p>Potential to provide railway station as on direct line to Tonbridge from High Brooms.</p>	<p>Operating between normal flows and slightly higher than normal for both AM and PM respectively.</p>	<p>Transport Assessment likely for this area given the relationship to the A21 and Royal Tunbridge Wells.</p> <p>Trip distribution and assignment to the wider M25/26 should also be assessed.</p>

<b>Royal Tunbridge Wells</b>	<p>Approx 780 dwellings allocated on 17 sites, plus 440 dwellings which already have planning permission</p> <ul style="list-style-type: none"> <li>• 14 hectare business park with over 80,000 sqm floorspace (North Farm/Longfield Road Key Employment Area)</li> <li>• New secondary school and two primary schools extended</li> <li>• New sports hub</li> <li>• New cultural and leisure facilities</li> <li>• Major new business park adjoining North Farm</li> </ul>	<p><b>3km</b></p> <p><i>A21/A264(Pembury Bypass)</i></p> <p><b>~20km</b></p> <p><i>M23 – J10</i></p> <p><i>M25 – J5</i></p> <p><i>M20 – J4/5</i></p>	<p>Impact will be widely felt on the A21/A264 interchange and will need to be monitored.</p> <p>Trip distribution likely to be needed for the wider impact on the M23/M25 and M20 network. Especially movements associated with the business park.</p>	<p>Current traffic at A21/A264 Pembury indicate higher than normal levels in the AM/ PM peak.</p> <p>A21/A26 (Mabledon) interchange does shows higher than normal southbound flows during the AM peak period.</p>	<p>Transport Assessment likely for this area given the relationship to the A21 at various junction points, especially A21/A26.</p> <p>Trip distribution and assignment to the wider M25/26 should also be assessed.</p>
<b>Mabledon</b>	<p>Approximately 300 dwellings, between 2 sites</p> <ul style="list-style-type: none"> <li>• Additional facility for hotel with 200 rooms</li> </ul>	<p><b>&lt;1km</b></p> <p>A21/ A26</p>	<p>Adjacent to the A21/A26 junction. Will need to demonstrate that additional movements can be accommodated.</p>	<p>Current traffic flows indicated higher than normal movement in the AM peak period, but normal levels during the PM peak.</p>	<p>Safe and direct access will be provided from the A26. Full capacity modelling would be required for the junction given its proximity.</p>

### Central Sites Allocations:

Location:	No/Type:	Distance to SRN:	Impact:	Current traffic flows:	Recommendations
<b>Pembury</b>	300 residential dwellings (5 site) Majority of the sites share boundary with A21.	<b>&lt;1km</b> A21 /A228/Hastings Road/Maidstone Rd/A264/ Longfield Rd  <b>&gt;15km</b> M25, M20	Significant impact expected on	Traffic data flags up current congestion problems in local and strategic road network surround Pembury during AM and PM peaks, particularly Kipping's roundabout and A21/A228/A264 interchanges .	Direct; mitigation required for the A21/A228 Interchanges. Modelling at these junction and Kipping's roundabout and mitigation measures required.
<b>Horsmonden</b>	225-305 residential dwellings (3 sites) Safeguarding land for primary school expansion, doctors surgery Open spaces Large scale developments >100 dwellings proposed.	<b>&lt; 5km</b> A21 / A262  <b>+25km</b> M20 J7/J8	Some impact expected at B2162 Lamberhurst Rd/ A262 T junction, A21 at Forstal Farm Roundabout. See screenshot for junction layout.	Traffic data shows moderate traffic currently at AM and PM peaks.	T junction modelling recommended at the B2162 Lamberhurst Rd/ A262 to understand impact of development turning right onto the A262 to join A21.  Roundabout modelling recommended at Forstal Farm roundabout. Mitigation at roundabout may be required to accommodate increase in trips.
<b>Matfield</b>	91-150 residential dwellings (4 sites)	<b>+2km</b> A21/B2160	Some impact expected at the A21/B2160 (Kipping's Cross roundabout) – majority of trips generated by developments in Matfield expect to use this junction to access the A21.	Traffic data show the roundabout is already badly congested at weekday AM and PM peaks (see screenshot below)	The location of Matfield means there is only 1 primary route option for traffic accessing the A21. Recommend junction modelling at the A21/B2160 roundabout. Mitigation at roundabout may be required to accommodate increase in

					trips.
<b>Lamberhurst</b>	50 – 60 residential dwellings (2 sites) Safeguarding land for future expansion of primary school. Small scale developments	< 2km A21	Interested in impact to A21 /B2169 Forstal Farm roundabout and Scotney Castle roundabout. Given small scale, unlikely developments will have major impact on junctions.	Current traffic data on Googlemaps does not flag any issue at Scotney Castle roundabout. Forstal Farm roundabout shows some congestion currently. See screenshot below.	Roundabout modelling recommended at Forstal Farm roundabout.
<b>Goudhurst</b>	21-26 residential dwellings (2 sites) Small scale development proposed at these sites.	A262 runs through Goudhurst, joining with the A21 at Forstal Farm roundabout approximately 4km west.	No / minimal impact given scale of development. Trips expected to use A21 Forstal roundabout for access onto SRN.	Currently roundabout showing some traffic during AM and PM peak hours.	NA

## Sustainability Appraisal Consultation Document (2019)

	<b>LP Ref</b>	<b>Highways England Comment</b>
SA1	Whole SA	<p>In accordance with the Highways England Licence, in exercising our legal duties and other obligations we will act in a manner best calculated to, inter alia,</p> <ul style="list-style-type: none"> <li>• Minimise the environmental impacts of operating, maintaining and improving the network and seek to protect and enhance the quality of the surrounding network; and</li> <li>• Conform to the principles of sustainable development i.e. encourage economic development while protecting the environment and improving safety and quality of life for current and future generations.</li> </ul>
SA2	Whole SA	<p>In accordance with national policy and normal practice, it is for each statutory consultee to comment on matters under their jurisdiction. Therefore, any comments regarding topics such as air quality, noise and vibration come within the remit of the statutory environmental bodies. However, Highways England would wish to work with all parties to fully understand any environmental implications of highways proposals or consequences, in order so assist the Council to reach evidence based conclusions and holistic decisions.</p>

## Local Transport Evidence Base (SWECO Sept 2019)

	<b>LP Ref</b>	<b>Highways England Comment</b>
LTEB1	Whole LTEB	<p>Highways England notes the production of a Local Transport Evidence Base (SWECO Sept 2019). We welcome its aims to</p> <ul style="list-style-type: none"> <li>• Assess the quality and capacity of transport infrastructure across the borough and its ability to meet forecast demands.</li> <li>• Assess the cumulative impacts of the Preferred Growth Strategy on all transport modes and networks and the impact on the locality, including the impact on networks in the locality of sensitive designated international sites.</li> <li>• Set out proposals to minimise the impact of the development on the transport network to inform the infrastructure requirements associated with the Local Plan</li> </ul>
LTEB2	Section 8 LTEB Transport Model	<p>The Council has separately provided Highways England with the Transport Model underpinning the Local Plan. We have therefore provided a separate technical note setting out our observations and requirements.</p> <p>In summary, while the model provides a good starting point, it requires further work before it can be formally signed off by Highways England. Particular matters include:</p> <ul style="list-style-type: none"> <li>• The area covered by the model</li> <li>• Some technical details and assumptions require further explanation and clarification</li> <li>• The need for a PM peak assessment as well as the AM peak assessment supplied</li> </ul> <p>We will work with the Council, Kent County Highways and SWECO on these tasks.</p> <p>It should be noted that</p>

		<ol style="list-style-type: none"> <li>1. This process may necessitate an update regarding our current policy and site specific comments set out in this letter.</li> <li>2. The Council are advised not to proceed significantly further with their plan making and transport evidence ahead of resolving the outstanding LTEB and modelling matters.</li> </ol>
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### **Infrastructure Delivery Plan**

	<b><u>LP Ref</u></b>	<b><u>Highways England Comment</u></b>
IDP1	Whole IDP	It would assist to include a map of the borough showing key infrastructure locations. This could be via different colour dots for each type of infrastructure. It would also assist in seeing the complete picture and any implications for the timing of infrastructure delivery.
IDP2	Whole IDP	While the themes are helpful, the Plan/IDP should also ensure that a holistic approach is taken. For example, to ensure the transport implications of the delivery of education, health, energy or communications provision in particular locations are assessed at the outset.
IDP3	Theme 1 Transport	Text should be included to acknowledge that mitigation required as a result of development within the Borough may be located beyond its boundary; for example, at the Flimwell Crossroads.
IDP4	Table 1	Equestrians should be included under transport.

### **Summary and Conclusion**

Highways England has assessed the Draft Local Plan and made comments in line with its remit to safeguard the safety and reliable operation of the Strategic Road Network.

Subject to the comments set out above, the Tunbridge Wells Draft Local Plan and its supporting documents contain policy, text and various means that should ensure that proposed developments effectively mitigate against any impacts upon the SRN.

However, in the short term there is an urgent need to address the various technical and other matters raised in our Technical Note on the Transport Model, and the implications for the wider Local Transport and Local Plan Evidence Base and the Local Plan policies and text.

Therefore, once you have been able to digest all the representations, it is suggested that the Council, Kent Highways, SWECO and Highways England meet to agree actions and a timetable.

I hope that the above information is helpful, but if you have any queries please do not hesitate to contact me.

Yours faithfully

**Kevin Bown BSc(Hons) MPhil CMS MRTPI**  
**Spatial (Town) Planning Manager**  
**Spatial Planning Team**  
**South East Region Operations Directorate**