



The countryside charity

Kent

Infrastructure Delivery Plan (PS_105)

Thank you for giving CPRE Kent the opportunity to comment on the additional evidence base submitted by the Council in connection with its emerging Local Plan.

We have the following comments.

It is difficult to understand what KCC and TMBC have planned to alleviate traffic hotspots on the A228 at Kippings Cross and Standings Cross.

On the one hand, while the proposals for roundabout improvements at Colts Hill bypass/Badsell Road and proposals for a pedestrian/cycle route from Paddock Wood to Tunbridge Wells are identified (at paragraph 3.21 at Table 3 (page 44) and Table 3 (page 42), respectively).

On the other, the construction of the section of the Colts Hill bypass that would connect to the roundabout at Badsell Road is not shown anywhere in the Infrastructure Delivery Plan as now being planned and no funding mechanism is identified.

The only reference to the Colts Hill bypass appears to be at paragraph 3.18 of the IDP, which states: "A relief scheme for Colts Hill has been explored in the past by Kent County Council. No scheme has been progressed to date, although a funding bid was submitted to the Major Roads Network programme in 2019 to deliver a scheme".

It is noted that other highway evidence relies heavily on the construction of this new section of the A228 (Colts Hill is part of the A228) to take traffic that would otherwise use the B2160 and the rural lanes, and thus to alleviate the problems forecast at the Kippings Cross and Standings Cross hotspots.

It is difficult to know what exactly TWBC and KCC are now planning.

We note that the costs against the Colts Hill/Badsell Road - £11.745m (identified in the PS105 Appendix 1 table) and £10.425 million (in PS 105 table 3 and PS106b Appendix 1) seem large for just a roundabout. Does this include the Colts Hill bypass too? If so, for the avoidance of doubt the wording in the Infrastructure Delivery Plan should be made clearer.

We would appreciate clarification on this point.

We also have the following comments on modal shift.

We understand from the Stage 3 hearings and from the map in Figure 3 of PS100 that the cycle route between Tunbridge Wells and Paddock Wood is planned to follow the A228 (including a section of the A228 south of the Alders Road junction, some of which is so

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narrow that two HGVs cannot pass each other easily) and then to use a minor road before crossing into woodland owned by TWBC.

There is at present no commitment from TWBC or KCC to use compulsory powers to create an off-road/behind hedge cycle route and without use of compulsory powers landowner agreement appears unlikely.

This cycle route will not be safe and pleasant enough to be used sufficiently to produce any measurable modal shift in travel between Paddock Wood and Tunbridge Wells unless it is entirely off-road/segregated.

It follows that any modal shift would need to rely entirely on improvements to the bus service, and while CPRE would strongly support these, in the present financial climate these appear uncertain.

If bus services are to result in modal shift they should not only operate between the towns with greater frequency than at present in the day time, but also, unlike the present services, later into the evenings and on Sundays. There appears at present to be no proposals for this.

The estimates for modal shift that have been applied for the hotspot junctions between Paddock Wood and Tunbridge Wells may therefore not be valid.

CPRE would like to know how funding for highway or public transport improvements will be secured, if the proposed modal shift and highway mitigations fail to produce the anticipated vehicular traffic reductions.

In addition, we would like information about how the effects on the historic lanes of the High Weald will be monitored and what action would be taken, and how quickly, if a serious increase in traffic on them is detected.

We do not wish to appear at the Hearing Session on 14 November.