

## Tunbridge Wells Borough Local Plan – Proposed Response by TWBC to the Inspector’s Initial Findings

### Representations on behalf of Crest Nicholson, Land North West of Paddock Wood

#### 1.0 Introduction

- 1.1 On behalf of Crest Nicholson, I set out below representations to the Tunbridge Wells Borough Local Plan - Proposed response by TWBC to the Inspector’s Initial Findings, in regard to their land interests at North West Paddock Wood, and in particular in strategic policy STR/SS 1, as amended by proposed Modifications SLP Mod 4, 6, 7, 8, and 9.
- 1.2 The response to the Addendum to Local Plan Viability Assessment (PS\_061a) has been sent separately.

#### 2.0 The Proposed Changes to Policy STR/SS1 – SLP Mod 9

- 2.1 As set out in the Proposed Modifications (PS-063) and the Local Plan Development Strategy Topic Paper (PS\_054) Policy STR/SS1 as proposed to be modified now runs to approximately 8 pages in length and now comprises four parts:
- Development Principles, setting out 15 criteria
  - Masterplanning, setting out 12 principles
  - Strategic Infrastructure, setting 10 principles
  - New Development Parcel policies:
    - (A) NW Parcel Requirements
    - (B) SW Parcel Requirements
    - (C) SE Parcel Requirements
    - (D) NE Parcel Requirements
- 2.2 Whilst Crest supports the overall principles of this policy, it considers the Policy to be unsound, as the policy wording needs to be more “effective” and concise. The policy could be further simplified and edited to make it easier to read, navigate and comprehend.
- 2.3 The Local Plan should be read as a whole; therefore, it should be as concise as possible with a minimal amount of repetition. This will also remove any discrepancies between slight deviations in wording of different policies or different parts of the same policy.
- 2.4 For example, Criterion 3 of Development Principles specifies that housing mix should accord with Policy H1. This is repeated (in less detail) in each of the Parcel Requirement Sections. Equally, the emphasis on the proposals being landscape-led should be in the Development Principles at the beginning of Criterion 5 and deleted from the Parcel Requirements. There are numerous other examples which duplicate the same point; therefore, the proposed policy needs to be heavily edited to be sound and avoid repetition and confusion. This will help the public also understand what is proposed and required of the whole and each parcel. This also will result in a much clearer idea of what each parcel will deliver in terms of infrastructure, as these will be the only elements left under each parcel section.
- 2.5 Crest has suggested an amended policy below as far as it affects the NW of Paddock Wood, but the principles can be extrapolated to the other parcels. It is suggested that an appropriate

form of words be agreed with those promoting the various parcels in advance of the Local Plan Examination resuming via a Statement of Common Ground to be presented to the Examination.

- 2.6 In regard to Criterion 6 of the Development Principles, which references zero and low carbon development in line with Policy EN3, this (along with Policy EN1 and EN3) needs to be considered in the context of the recent Written Ministerial Statement of the Minister of State for Housing on the 13 December 2023, which states that:

*“The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, **the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.** The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*

- *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
- *The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).”*

- 2.7 Given the above, and notwithstanding Crest’s commitment to zero carbon homes/carbon neutrality on all their sites there is no need for additional standards to be placed on developments through additional Local Plan policies that vary from that required in national government guidance. Crest suggest that Criterion 6, and potentially EN1 And EN3 are redrafted accordingly.

### The Use/Production of SPD

- 2.8 Crest notes that the Development Principles section of the modified policy STR/SS1 requires under criterion 13 that: *‘The development proposals for the whole of the allocated area shall embed garden settlement principles. Proposals for each Parcel should give effect to this requirement and be guided by the Council’s Structure Plan SPD for the whole of the allocation;’* and under criterion 15 that *‘The development to be delivered to be in accordance with a Framework Masterplan Supplementary Planning Document (SPD).’* In addition, criterion ‘i’ of the Masterplanning section of the modified policy STR/SS1 requires: *‘All development proposals in relation to the Eastern and Western parcels shall be in accordance with an approved masterplan relating to each parcel that will respect the above requirements and take into account the Council’s Structure Plan SPD’.*

- 2.9 From discussions with officers since the publication of the Proposed Modifications, however, it is Crest’s understanding that the process will be changed as follows:

- The Council’s Structure Plan (the work undertaken by David Lock Associates) will be proposed to be included as an Appendix to the Local Plan, to reflect the changes being brought forward in the LURB to not have SPD and not further delay adoption
- Joint masterplans for the West and the East will be prepared by Crest and Dandara, and Redrow and Persimmon respectively with the Council’s officers and statutory consultees and should be in general conformity with the Council’s Structure Plan set out in the Appendix and submitted with the individual planning applications to show comprehensive and cohesive development.

- 2.10 Crest supports this new suggested process rather than that set out in the proposed modified policy. It will provide the least amount of delay in delivering the sites to meet the proposed delivery trajectory process whilst also providing certainty in terms of meeting the Plan's objectives for Paddock Wood.
- 2.11 Crest is already in discussions with Dandara regarding a Western Masterplan, and this can be reflected in a Statement of Common Ground to formally set out the position to the Examination.
- 2.12 As such, Crest recommend the Development Principles Criteria 13 and 15 be amended as suggested in Section 3 below to reflect these changes.

### **Reference to the Strategic Sites Masterplanning and Infrastructure Study**

- 2.13 The SSMIS dated February 2021 is referenced in Masterplanning Criterion xiii and in (1) of Strategic Infrastructure. Crest is concerned about the reference to the SSMIS "*as updated from time to time*". As the plan is proceeding on the basis of the recommendations of the latest version of that document (PS\_046) and all the viability assessment work (in PS\_061) has been compiled to reflect this, Crest is concerned that any future amendments/ updates could prejudice the basis of the plan examination and the basis upon which those promoting the sites in Paddock Wood are doing so. As such, Crest suggest that policy STR/SS1 needs to be clear that any amendments to this document would be subject to consultation with all relevant parties. See suggested amendments to the Policy below in Section 3.

### **Strategic Infrastructure**

#### **Sports and Leisure**

- 2.14 Criterion f) of the Strategic Infrastructure section of the modified Policy references sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool). This should more clearly set out the revised leisure strategy set out in the Paddock Wood Strategic Sites Master Planning Addendum (PS\_046) that there will be financial contributions for improvements to existing facilities at Puntland's and the introduction of new outdoor sports facilities at Green Lane in Paddock Wood, as well as the more limited provision of outdoor pitches in STR/SS1(B) the South Western Parcel. The mechanisms for the delivery of both elements of this provision and the manner in which it relates to the housing delivery needs to be clarified so as not to prejudice the housing trajectory.
- 2.15 It is not clear, how this revised strategy and requisite contributions fit in with the Council's Infrastructure Delivery Plan (IDP), as no revised IDP has been published in the Post-Initial Findings Evidence Base Documents.
- 2.16 In addition, we note the point made at para 4.61 of the Development Strategy Topic Paper Addendum (PS\_054) that consideration is also being given as to how '*Further intensification of use could occur, for example by the replacement of the grass football pitch with an artificial surface, which can be used for more hours each week, supporting greater levels of participation and provision*'. Whilst having no objection to this in principle, the associated costs are somewhat different and reassurance needs to be provided as to what has been allowed for in the Viability Assessment.

#### **Health Provision**

- 2.17 Criterion g) states that health provision should be split across one or all of the local centres. Crest notes, however, that the Paddock Wood Strategic Sites Master Planning Addendum

(PS\_046) indicates that health provision is now to be off site. Also, the addendum Local Plan Viability Assessment (PS\_61b) has identified an infrastructure cost of £3mn against a new health care facility. Clarity is sought as to what is intended as, at present the evidence base is contradictory and this matter has not been discussed with the developers.

### Secondary School

- 2.18 Criterion h) of the Strategic Infrastructure section of the modified Policy requires, “*the delivery of secondary school provision equivalent to 3 Forms of Entry (3FE) within the North-Western development parcel, unless it is demonstrated that through feasibility studies that the provision can be delivered through other means such as expansion of existing secondary school provision*”. Criterion vii of STR/SS1A – the north western parcel requires, “*Safeguarding of land for 4FE secondary school that has land available to expand to 6FE should it be required*”. This is confusing. It is suggested that it is explained in Criterion h) that the new development at Paddock Wood only generates enough secondary school children for a 3FE school, but that is not large enough for a standalone school. As such, if a new secondary school site is required in the NW Parcel, Kent County Council would want a 4FE school, with the land available to expand to 6FE should it be required, and that KCC will fund the additional classrooms beyond the 3FE.
- 2.19 Further explanation and clarity are required to explain that the feasibility of expanding Mascalls Academy is also being considered. to accommodate a 2 or 3FE expansion, taking it from 8 to 10/11 FE. The lower number takes into account the current average percentage of pupils that attend a selective school (35%). As you are aware, the feasibility study is being undertaken in consultation with Leigh Academy Trust which runs Mascalls, and consultants acting for TWBC/KCC. As a prelude to this work, it has been acknowledged that notwithstanding the fact the current Persimmon application in the south east of Paddock Wood includes 3.84Ha of land adjacent to Mascalls Academy to facilitate the potential expansion of the school, that there is likely to be sufficient land available on the existing school site to enable the expansion of Mascalls Academy in order that it can provide sufficient non-selective secondary education places for the whole of the proposed development of Paddock Wood.
- 2.20 Currently Mascalls school site occupies land covering a total of 13.4ha and DfE guidance regarding the recommended minimum and maximum site areas for secondary schools indicates that for an 11FE secondary school with a sixth form, the range of recommended site areas is 10.8 – 13.57ha. As a result the feasibility study is predicated on using the schools existing site without the need for additional land, albeit it is acknowledge the additional land is there if required and that the majority of this parcel of land has the same or similar gradient near Chantler’s Hill as the land further west which is also part of the existing school site, such that any proposal to use all or part of this additional 3.84Ha of land either for school buildings or other school uses would be similar to the uses which could be proposed on the existing school land located further west.
- 2.21 Given the above the assumption in the Paddock Wood Strategic Sites Master Planning Addendum (PS\_046) that the secondary school requirements will most likely be addressed through the safeguarding of land for a 6FE secondary on land to the west of PW needs to be considered in context and the safeguarding of said land within STR/SS1(A) addressed accordingly, as suggested in the amended policy wording in Section 3 of this report.
- 2.22 If it is proved that the expansion is feasible, this is the preferred option by Kent County Council, and developers will be required to contribute financially.

### Cycle and Pedestrian Provision (Including the Bridge Over the Rail Line)

- 2.23 Criterion i) of Strategic Infrastructure section references cycle and pedestrian provision and specifically the north-south pedestrian and cycle bridge over the railway line linking the North Western and South Western parcels. Crest does not object in principle to contributing to a

bridge and providing land for it, but it did object to the wording of this part of the policy in the Submission Local Plan, and still maintains its objection as it is for the Council to facilitate the provision of the bridge with Network Rail. As such, Crest has suggested the criterion is amended to set out that the Council will take the lead and will facilitate delivery between all relevant parties to ensure timely and efficient delivery.

### Highway Infrastructure

- 2.24 In terms of highway infrastructure, the Paddock Wood Strategic Sites Master Planning Addendum (PS\_046) indicates that masterplanning will proceed by modifying the 'Scenario 2' Infrastructure Schedule of the original infrastructure study (CD 3.66), which set out required infrastructure should only the Paddock Wood sites come forward, and that off-site highways provision has been re-examined as part of TWBC's Stage 3 highways modelling (undertaken by SWECO). It is not clear, however, how this has taken on board the proposed response to secondary educational needs, and the revised sports provision, and potential effects of this on the network. Nor is it clear if, in terms of the secondary education provision, an alternative option has also been considered – i.e. the expansion of Mascalls Academy and the associated local highway impacts.
- 2.25 There is Review of Key TWLP Documents by Ardent, Crest's Highways Consultant, appended to these representations. This sets out a number of issues that will need to be addressed. In summary:
- **The north-south railway crossing** should be clearly outlined as a strategic improvement for the town rather than a development-specific link, as indicated on Page 40 of the LCWIP – Stage 2 (October 2021), which states that:  
*“The extent of routes to the north were limited by the lack of crossing points across the railway line which is **an overarching issue for the town** and further enhancing connectivity with the north of Paddock Wood.”*  
The benefit of such a strategic designation is to secure the necessary planning policy support for the implementation of the foot/cycle bridge, given that participation from Network Rail (NR) would be require to effect the improvements
  - Given the reduction in dwelling numbers, it is suggested the **bus gate** should be removed from the masterplan at this policy stage, allowing for more detail to be investigated when more detail on the configuration of the E-W development spine road is fully tested through the Transport Assessment that would be prepared at the planning application stage
  - Some flexibility should be adopted around the ambitious 10% **bus mode share with the Travel Plans** for each individual developments, whereby bus patronage would be monitored to ensure that service frequency and demand can be match in achieving the viable bus services
  - any **public transport strategy** option that results in a significant shortfall at the end of the (Local Plan) period should be discounted if it is not able to demonstrate long-term viability of the services (and thus sustainability). Any loner term financial support needs to meet Regulation 122 tests. The concept of Demand Responsive Travel should be reviewed as an alternative to all of the options considered within the study, with the ambition to make the service both convenient and sustainable over the longer term
  - The removal of the Tudeley Garden Village from the Local Plan does not change the fact that the sole responsibility for **the A228 Colts Hill Bypass** would itself not rest on the strategic allocations at Paddock Wood either, and that some form of external funding should be identified in view of its wider benefits. The trigger point for the link into a potentially expanded Badsell Roundabout is *“estimated to be approximately 2000 dwellings.”* On the basis of the evidence presented, it cannot categorically be stated with any degree of confidence that the A228 Colts Hill Bypass is solely a requirement of the strategic allocations, when its trigger point could realistically post-date the period of the Local Plan

- In terms of wider highway management, it is not doubted that the Colts Hill bypass may provide some benefit to the wider network, however **the Local Plan must adopt a forward-thinking approach** regarding the creation of new road infrastructure and prioritise the implementation of sustainable transport schemes, particularly where other assumptions have been based on securing higher level of modal shift.



### 3.0 Suggested Amendments to Revised Policy STR/SS1

3.1 This section sets out Crest's suggested amendments to Revised Policy STR/SS1 in order to make it more effective and concise

Notation: **New suggested text.** ~~Suggested deleted text~~ [\[Comment\]](#)

#### Development Principles

5. Be **landscape led and** of a high standard of design with particular attention to be paid to structural and detailed landscaping (to promote and deliver a continuous and homogeneous landscape approach to the allocation as a whole), layout, scale, height, detailed design, and massing to ensure that the development responds to local character and its overall setting. Planning applications for development should be informed by a landscape and visual impact assessment, biodiversity and heritage studies and the initial outline/ hybrid applications should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application;

6. Incorporate ~~zero and low carbon development, in line~~ **with the Future Homes Standards, or any future national update**, ~~the requirements of EN3, provide an exemplar scheme with climate change mitigation and adaptation measures and sustainable development principles in relation to the design, construction and operational stages;~~

7. Meet the informal and formal recreational needs of the development and provide areas of green and open space [as shown schematically on Map 28], and biodiversity objectives of Policy EN9 and which where possible integrates with neighbouring Parcels to ensure a consistent and legible functional and visual relationship between them. **This should incorporate a scheme of management of communal spaces and green infrastructure within the eastern and western parcels including provision for management and funding, initial community and stakeholder involvement with amenity, landscape, and biodiversity objectives for a period of 30 years from the completion of the development.** [\[moved from Masterplanning Criterion v\]](#)

11. Provide walking and cycling linkages within and between each parcel, together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside **in accordance with Policy TP2;...**

12. Where possible and practicable connect to and enhance the existing bridleways network;

13. The development proposals for the whole of the allocated area shall embed garden settlement principles. Proposals for each Parcel should give effect to this requirement and be guided by the Council's Structure Plan for the whole of the allocation **as set out in the Appendix XX to this Local Plan**

14. Proposals for the piecemeal development of individual sites in the Eastern and Western Parcels that do not conform to the above requirements as a whole will not be permitted; and [\[Suggest this becomes Criterion 15\]](#)

15. ~~The development to be delivered to be in accordance with a Framework Masterplan Supplementary Planning Document (SPD)~~ **Further, joint masterplans for the West and the East of Paddock Wood should be prepared by the respective developers with the Council and relevant statutory consultees and submitted for approval with the individual planning applications to show comprehensive and cohesive development.** [\[Suggest this becomes Criterion 14\]](#)

## Masterplanning

As set out above at [\[suggested\]](#) Criterion 14, the new development shall be delivered through a joint masterplan approach for the West and East of Paddock Wood

i. All development proposals ~~in relation to the Eastern and Western parcels~~ shall be in accordance with an approved the appropriate Masterplan relating to each parcel that will respect the above requirements and take into account the Council's Structure Plan SPD. Where development parcels abut each other and developers have worked collaboratively on masterplanning, this will be supported where it meets the other aims and objectives in this policy. ~~The masterplan shall be submitted to the Council for its approval as part of the initial application for planning permission in relation to (any part of) the relevant Parcel.~~

ii. Each Masterplan shall show the intended overall design and layout of the development and the proposed distribution and location of uses across the Parcel including its functional links with neighbouring Parcels, the existing community of Paddock Wood and Paddock Wood Town Centre and surrounding land which shall accord with, be based upon, and promote, garden community principles as required in para.2 above.

iii. Demonstrate how heritage assets and their settings will be sympathetically integrated into the development and their significance respected;

iv. Show all structural landscaping and indicative treatments to be provided (including boundary treatments);

v. Incorporate a green and blue infrastructure (GBI) plan which is informed by a comprehensive wildlife and habitat survey and heritage and landscape character assessments. ~~This should incorporate a scheme of management of communal spaces and green infrastructure within the eastern and western parcels including provision for management and funding, initial community and stakeholder involvement with amenity, landscape and biodiversity objectives for a period of 30 years from the completion of the development;~~ [\[Suggest moving to amended Criterion 7 of Development Principles\]](#)

vi. Show how the development will incorporate the full range of sustainable transport measures, the proposed transport links, including access to the development and main internal highway links and all intended links within the site and to the surrounding footpath and cycleway and bridleway network, including proposed and potential footpath and cycleway and bridleway links to the wider area. All pedestrian and cycle links through the allocated site should be convenient and highly legible

vii. Show how development will safeguard, maintain and, where possible, enhance key views in and across the allocated site;

viii. ~~Provide for convenient and highly legible pedestrian and cycle links through the allocated site;~~ [\[moved to criterion vi. above\]](#)

ix. ~~Show how the development will incorporate the full range of sustainable transport measures;~~ [\[moved to Criterion vi. above\]](#)

x. Identify the locations and forms of the district and local centres, including the community and healthcare facilities to be provided within them as necessary;

xi. Incorporate a parking strategy in accordance with policy TP3 in relation to each Parcel.

xii. Proposals for employment development on the Northern Parcel shall be required to comply with the requirements of paragraph 8 (a), (b), (c) and (e) to (j) above. [\[Not sure what this refers to\]](#)

xiii. The masterplans for the East and West Paddock Wood shall include a phasing and implementation plan which shall identify the phasing of development across the whole of the relevant Parcel to ensure that the development will be carried out in a manner that co-ordinates the



implementation and occupation of the development and the timely delivery of such necessary on and off-site infrastructure as shall be reasonably required to support the development and occupation of each Parcel and its proper integration with neighbouring Parcels and the timely provision of Parcel specific and shared infrastructure taking into account Table 11 of the Council's SSMIS dated February 2021 as may be updated, **following consultation with relevant parties**, from time to time) or as may otherwise be reasonably required.

### **Strategic Infrastructure**

The development shall be delivered in accordance with the phasing and implementation plan **as approved under Criterion xiii above**, ~~which shall be required to be~~ **and** secured by conditions and/or s.106 obligations **to individual developer applications** to ensure that:

- i) Development across the whole of the allocated site shall be capable of being integrated and phased and its impacts satisfactorily and mitigated;
- ii) There are supporting facilities (including access to green and blue infrastructure, leisure and sporting facilities, shops, health, community, and educational facilities) that will allow the early establishment of a self-sufficient and cohesive community with an appropriate level of supporting infrastructure provision;
- iii) Occupiers have a range of sustainable travel options at their disposal, including access to bus services and the cycle and pedestrian links;
- iv) Transport links and associated transport and highway improvements and the provision of new transport and highway infrastructure is provided when it is needed to support the development and mitigate potential off-site highway and other transport impacts;
- v) The delivery of necessary infrastructure shall be informed by ongoing discussions with relevant stakeholders, including Kent County Council and adjacent local authorities (Tonbridge & Malling and Maidstone Borough Councils) and other relevant statutory consultees and be kept under review throughout the planning stages of the development.

Save to the extent covered by CIL requirements (if any), development proposals in relation to all Parcels will be required to be supported by planning obligations that provide so far (as necessary and reasonable) either for

- (1) the timely payment of proportionate contributions towards the carrying out and/or implementation of strategic and other necessary highway mitigation works and improvements, education and health provision and other necessary infrastructure as identified in the Council's Strategic Sites Masterplanning and Infrastructure Study as updated from time to time, **following consultation with relevant parties**, and/or
  - (2) its actual provision, as appropriate. This will include the requirement to pay reasonable and proportionate contributions retrospectively towards such infrastructure to support the development as may have been forward funded through other sources where the provision of such infrastructure is necessary and reasonable. Where necessary and appropriate, the occupation of the development shall be regulated by reference to the completion or provision of any such infrastructure as may be necessary to support the development and its sustainability, to be determined by reference to evidence current at the point of determination.
- f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool);
  - g) Health provision split across one or all of the local centres;
  - h) ~~The delivery of secondary school provision equivalent to 3 Forms of Entry (3FE) within the North-Western development parcel, unless it is demonstrated that through feasibility studies that the provision can be delivered through other means such as expansion of existing secondary school provision;~~ **The delivery of secondary school provision equivalent to up to 3 Forms of Entry (3FE). Subject to the current feasibility study, this may be delivered through the expansion of Mascalls Academy or through the provision of a safeguarded site within the North-Western development parcel (both alternatives are shown on the Revised Map 28). If the latter is required, the safeguarded site will need to be able to**

**accommodate a 4FE school as a minimum, with the land available to expand to 6FE should it be required. Kent County Council will fund the additional classrooms beyond the 3FE, if required.**

- i) Cycle and pedestrian links across the development parcels and linking into the existing settlement including a **strategic improvement of a north-south pedestrian and cycle bridge over the railway line linking the North Western and South Western parcels, linking neighbourhoods, and providing access to community facilities. In regard to the railway bridge, the Council will take the lead and will facilitate delivery between all relevant parties to ensure timely and efficient delivery;**

### Suggested Amendments to Policy STR/SS1(A) – North Western Parcel Requirements

#### Policy SS/STR 1(A) - North Western Parcel Requirements

- vi) A minimum of 770 dwellings, 40% of which shall be Affordable Housing in accordance with policy H3;
- vii) ~~A mix of housing in accordance with policy H1.~~ [Duplicates Criterion 3 of Development Principles]
- viii) ~~A scheme designed with a landscape led approach;~~ .[Duplicates Criterion 5 of Development Principles, as suggested to be amended above]
- ix) A two-form entry primary school, safeguarded to enable expansion to three form entry;
- x) A three-pitch gypsy/traveller site (to include space for one mobile home and one touring caravan per pitch) to be accommodated on the North - Western parcel south of the railway line in accordance with policy H9;
- xi) **Subject to being viable**, a local centre providing up to 700sqm commercial floorspace (Class E(a) to (f)) in total;
- xii) Safeguarding of land for 4FE secondary school that has land available to expand to 6FE should it be required;
- xiii) ~~Provide walking and cycling linkages within the site connecting to adjacent development parcels, existing walking and cycling infrastructure including together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside in accordance with policy TP 2;~~ [Duplicates Criterion 11 of Development Principles, as suggested to be amended above]
- xiv) ~~Incorporate zero and low carbon energy production, in line with the requirements of policies EN 1 and EN 3;~~ [Duplicates Criterion 6 of Development Principles, as suggested to be amended above]
- xv) ~~Provide appropriate areas of green and open space;~~ [Duplicates Criterion 7 of Development Principles]
- xvi) **If proved necessary by the approved flooding and drainage scheme**, a Wetland Park within and to the north of the North-Western parcel to deliver flood water attenuation and new wetland habitat, allowing for informal recreation via a network of footpaths and boardwalks;

- ~~xvii) Phasing and contribution towards strategic infrastructure delivery as set out in STR/SS 1; .[Duplicates first sentence of strategic Infrastructure as suggested to be amended]~~
- xviii) Provision of appropriate water supply and access to wastewater treatment facilities, inclusion of conservation and control through use of Sustainable Drainage Systems, and the contribution to an overall flood risk reduction in accordance with policies EN 24, EN 25, and EN 26; and provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement.
- xix) To provide compensatory improvements to the Green Belt;
- ~~xx) Development to be delivered to be in accordance with a Framework Masterplan Supplementary Planning Document (SPD). [Duplicate of Criterion 13 of Development Principles]~~

23 February 2024

**STANTEC UK LIMITED**

**APPENDIX – REVIEW OF KEY TWLP DOCUMENTS, ARDENT CONSULTING ENGINEERS**

# TECHNICAL MEMORANDUM

Prepared on behalf of Crest Nicholson



AN EMPLOYEE OWNED COMPANY

<b>Project Name</b>	Land NW of Paddock Wood
<b>Client</b>	Crest Nicholson
<b>Project Ref</b>	2204210
<b>Report Ref</b>	Review of key TWLP documents
<b>Date</b>	19/02/2024

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## TECHNICAL MEMORANDUM

Prepared on behalf of Crest Nicholson

**ARDENT**  
CONSULTING ENGINEERS

AN EMPLOYEE OWNED COMPANY

### Introduction

This Technical Memorandum provides some commentary on the relevant transportation matters covered by the updated evidence base documents prepared by Tunbridge Wells Borough Council (TWBC) as part of their consultation process into the revised emerging [Tunbridge Wells Local Plan](#).

The intention is for the comments to form part of written representations which are to be made by Stantec, on behalf of Crest Nicholson, pursuant to the continued inclusion of its site on Land NW of Paddock Wood as a strategic allocation for residentially-led mixed-use development within the plan.

This follows a decision by TWBC to resume the Local Process through the publication of a [Local Plan Development Strategy Topic Paper – Addendum \(January 2024\)](#).

#### **1. PS\_046 –Paddock Wood Strategic Sites Master Planning Addendum** in conjunction with **PS\_046c-Figure 14– Infrastructure provision for Paddock Wood (October 2023)**

The [Paddock Wood Strategic Sites Master Planning Addendum \(October 2023\)](#) sets out the framework for the development allocations in terms of movement, with a clear focus on sustainable modes of transport.

### **Pedestrians / Cyclists**

Within the document, the [Paddock Wood Local Cycling and Walking Improvement Plan \(LCWIP\)](#) is referenced, citing the need for improved movement along N-S movement corridors, with primacy being given to the B2160 Maidstone Road.

However, the [Paddock Wood Strategic Sites Master Planning Addendum \(October 2023\)](#) also states in Para 3.13:

*"The addition of a new secondary school to the northwest (see study on options in following section) places greater importance on the north-south movements across the railway line, particularly for active travel. Secondary schools are significant destinations, and thus improvements to active travel provision on the existing Maidstone Road bridge, and a new north-south bridge between the western sites will be essential to ensuring the school can be accessed."*

It is noted that the [PS\\_046c Infrastructure Provision for Paddock Wood \(October 2023\)](#) plan produced by DLA shows a pedestrian/cycle route between the two strategic allocations to the south and north of the railway line.



## TECHNICAL MEMORANDUM

Prepared on behalf of Crest Nicholson

**ARDENT**  
CONSULTING ENGINEERS

AN EMPLOYEE OWNED COMPANY

However, this Railway crossing should be clearly outlined as a strategic improvement for the town rather than a development-specific link, as indicated on Page 40 of the [LCWIP – Stage 2 \(October 2021\)](#), which states that:.

*"The extent of routes to the north were limited by the lack of crossing points across the railway line which is an overarching issue for the town and further enhancing connectivity with the north of Paddock Wood."*

### **Bus Gate**

The [PS\\_046c Infrastructure Provision for Paddock Wood \(October 2023\)](#) plan also shows a 'bus gate' located on the eastern section of the proposed spine road through the NW Paddock Wood development.

There appears to be no specially stated intention that this bus gate should otherwise restrict access by cars to/from the B2160 Maidstone Road, although this is what it is likely to entail in practice. There is also no information presented as to the likely configuration or hours of operation of the bus gate, in defining how it would operate.

The [PS\\_047-TW Stage 1 Technical Note Review of Strategic Model Methodology and Set-Up for Local Plan \(August 2023\)](#) report itself suggests that around 540 dwelling would be accessed by all modes of vehicular traffic to/from the B2160 Maidstone Road.

There would therefore appear to be some inconsistency between this assumption and the inclusion/location of the bus gate shown in the framework Masterplan, when reviewed against the spatial distribution of homes within the Masterplan.

Given the revised (lower) scale of the development at NW Paddock Wood, there is no specific benefits in restricting the use of the A228-B2160 development spine road should. No through-movements would be a missed opportunity to provide further infrastructure (highway) capacity for the town, which could lead to some re-assignment of traffic locally. This would offer an opportunity to relieve existing road corridors in the town centre that could, in turn, allow for greater prioritisation of active modes (such as on the B2160 through the town and B2017 Badsell Road).

For its parts in meeting the needs of pedestrians and cyclists, the development at NW Paddock Wood focuses its strategy on segregated and direct corridors to/from the town centre and railway station, something that is more difficult to replicate within the existing village without some re-purposing of existing streets.

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It is suggested the bus gate should therefore be removed from the masterplan at this policy stage, allowing for more detail to be investigated when more detail on the configuration of the E-W development spine road is fully tested through the Transport Assessment that would be prepared at the planning application stage.

### **2. PS\_040 – Tunbridge Wells Public Transport Feasibility Study Review (October 2023)**

The **Public Transport Feasibility Study Review (October 2023)** seek to reflect the change to strategy that would occur as a result of reducing the number of dwellings being pursued through the revised Local Plan.

Although inter-urban services are considered to link Paddock Wood with others settlements, it is not anticipated that the strategic development allocations at Paddock Wood and East Capel would necessarily be responsible for contributing to the delivery of any such services in full, based on the increase in patronage alone.

The report itself does little to bring any quantification of exiting users, in establishing whether any of the options would ultimately be viable in the long-term. It states that:

*"On this basis, the options have not been developed using existing data pertaining to ridership across the existing service network within the study area and as such an in-depth analysis of the peak flows, directions, and days of the week where buses are most popular has not formed part of the initial brief."*

The Report simply presents 'potential' options that could underpin the rationalisation of existing (and new) services in the Borough, rather than necessarily indicate what may be required or desirable to specifically accommodate the spatial growth options.

### **3. PS\_041- Paddock Wood Bus Service Options (October 2023)**

The report focuses on a strategy specifically to serve the expanded settlement at Paddock Wood.

#### **General**

It is noted that the report highlights the excellent rail connectivity and commuting potential for London-bound users, with all bus options interacting with Paddock Wood Railway Station.

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The Railway Station and town centre are considered to lie within reasonable active travel distance to/from the NW Paddock Wood development and therefore the mode share is likely to be positively skewed towards rail-based and active travel modes, compared to bus.

The inclusion of two bus stops/halts, as shown in all options within the Paddock Wood NW parcel is, however, supported.

### **Bus Services Options**

Within the **PS\_041- Paddock Wood Bus Service Options (October 2023)** report, three bus service options are considered, with projected costs based on services at 15 and 20-minute intervals.

Options 1 and 2 operate the same route, however, Option 2 includes an extended running time between 6am-11pm whereas Option 1 and 3 are 7am- 7pm. Option 3 alters the location of bus stops adjacent to Paddock Wood Railway Station.

Chapter 9 sets out projected revenue for the bus services options, including a forecast each year for the duration of the local plan up to 2034. The revenue has been shown based on 3%, 5% or 10% bus mode share levels. In doing so, the report cites the DFTs 2021 National Travel Survey

*"With the data provided by the DFT2 in 2021, the mode share of bus dropped to 3% post-Covid. Following a recovery of the economy to pre-covid levels, a 5% bus mode share would be an appropriate figure for the baseline scenario."*

A review of **2021 Method of Travel to Work Census** data for the 'Paddock Wood and Five Oak Green' Major Super-Output Area (MSOA) indicates a current mode share of 0.8% for bus users.

This data would suggest that an assumed 5% baseline modal split could be challenging to achieve.

The table below shows figures extracted from the report highlights the anticipated 'break even' point of each option, based on the patronage equivalent to a 5% modal split for bus.

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Option	Year of breakeven point with 5% bus patronage
1a	2043
1b	2049
2a	2047
2b	2053
3a	2043
3b	2049

The study does not provide break even points for the existing 3% baseline level of bus-use that is reported, as an alternative potential assumption that could be adopted.

As shown within the table above, none of the suggested options are expected to break even within the primary Local Plan period up to 2034, with the worst option being 2b showing a likely break even point of 2053.

From the above, the only Options which appear, on current assumptions, to be viable are Option 1a and 3a which become profitable in 2033, albeit this is dependent on the bus modal share increasing to 10%, which appears unrealistic.

Within the study, it is also stated that:

*"It should be noted that, as this service would operate in addition to the previous network changes proposed, there could be a degree of abstraction of revenue from those services, should the additional service be introduced."*

This indicates that the additional services and extension to services, included those noted within **Tunbridge Wells Public Transport Feasibility Study Review (October 2023)**, have not been accounted for in terms of the potential patronage split or service frequency that could be supported overall.

Ultimately, if a strategy has limited prospect of being implementable without significant and on-going commercial support, then it cannot be considered to be necessary in planning terms to support specific development(s).

It is also noted that the revenue predictions within have been based on a nominal £1 bus fare, citing the example of this scheme in Taunton where the patronage increased by 24% based on the lower fare cap.

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Compared to the population of Paddock Wood at approximately 8000, Taunton numbers 64000 people with a greater range of facilities and internal destination which would warrant a more comprehensive public transport network.

Using the 3% mode share discussed within the report, a 24% increase would result in an overall mode share of 4%, well below the 10% target. Furthermore the Sweco [PS\\_049TW Local Plan Stage 3 Modal Shift Impact Reporting](#) document, has assumed a potential modal shift of between 4-9%, split across all modes of transport, not solely for bus patronage.

A reliance on a public transport strategy that requires higher modal share to achieve a viable service has to be tempered therefore by what a town of this size can realistically support.

The Policy should therefore reflect the requirement for continual monitoring and adjustment of the bus service provision to ensure financial viability can be reviewed over time.

Some flexibility should be adopted around the ambitious 10% bus mode share with the Travel Plans for each individual developments, whereby bus patronage would be monitored to ensure that service frequency and demand can be match in achieving the viable bus services.

### **Funding**

Within the report it is stated:

*"It is likely that a new bespoke bus service will be required to better serve the areas. This would be a local bus service for the immediate Paddock Wood town and suburban area and could be funded in part or full with Section 106 funding attached by the new housing developments."*

It is understood that some level of funding is required to support the comprehensive improvement of public transport options within Paddock Wood.

Funding secured through Section 106 agreements can have an important role to play in supporting the introduction of improved or new bus services during the 'uneconomical' period when the patronage arising from new developments would be insufficient to make these services viable.

Indeed, it is generally positive to offer the widest choice of travel modes from early on within a development's build-out period. This allows new residents to shape their travel behaviours from the earliest point of occupation.

However, any public transport strategy option that results in a significant shortfall at the end of the (Local Plan) period should be discounted if it is not able to demonstrate long-term viability of the services (and thus sustainability).

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When it comes to developer funding, the Local Plan needs to clarify that any longer term financial support or some form of in-perpetuity provision from developers would not meet the planning obligations tests:

- 1. Necessary to make the development acceptable in planning terms.*
- 2. Directly related to the development; and*
- 3. Fairly and reasonable related in scale and kind to the development.*

Should more optimistic assumptions on patronage and modal shift be adopted to underpin any subsidy requirements, an appropriate review mechanism should be included as part of a monitor and manage approach.

The concept of Demand Responsive Travel (DRT) is also supported within the **PS\_041-Paddock Wood Bus Service Options (October 2023)**, to supplement the service and extend the hours instead of Option 2. This should be further reviewed as an alternative to all of the options considered within the study, with the ambition to make the service both convenient and sustainable over the longer term.

#### **4. PS\_046a-Figure 5 – Structure Plan for Paddock Wood (October 2023)**

Within the revised framework Masterplan, a bus gate has been included on the eastern section of the spine road through the NW Paddock Wood development, indicating a restriction of vehicular movements through the site.

It is not recommended that vehicular access should be restricted at this time, allowing for Transport Assessment to outline the benefits associated with the configuration of the E-W spine road to be considered within the Transport Assessment (TA).

#### **5. PS\_50 RAG Assessment Access and Movement Colts Hill Bypass**

Stantec has undertaken a RAG assessment on the Colts Hill Bypass. This assessment only covers Landscape and Visual, whereas the RAG Assessment for the Five Oak Green Bypass was far more extensive, covering deliverability, air quality, noise and Road safety aspects. The rationale behind this decision is unknown.

The Landscape and Visual aspect has been marked as Amber within the Assessment which indicates the following:



*"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."*

Comments include visual and landscape effects to the PROW network. With the definitive statement:

*"Some landscape and visual effects on PROWs and users of PROWs are likely significant."*

It is agreed that these aspects of the A228 Colt Hill Bypass project have not been comprehensively considered ahead of its inclusion as a major infrastructure scheme. Further Plans regarding the possible diversion of the PROW and crossing over the proposed bypass would be required for stakeholders to understand the possible interfaces.

Details on other elements such as deliverability and noise should be provided within a RAG assessment to understand the full context of the scheme.

Further details of the impact on local PRoWs should be published to understand the impact on the sustainable travel network.

## **6. PS\_053 Provisions for Sustainable and Active Travel (November 2023)**

The Provision for Sustainable and Active Travel (November 2023) document, prepared by Tunbridge Wells Borough Council, outlines some of the work done to date. It is stated that:

*"within the recent technical note produced by Sweco. This includes [...] Review of Paddock Wood zone loading to confirm accuracy in key junction where traffic flows will be loading onto the network."*

Although there is no reference to the specific document, it is assumed that the correct reference to the work completed is the **Stage 1 Technical Note Review of Strategic Model Methodology and Set Up for Local Plan (August 2023)**, which provides information on the zones, nodes and number of dwellings served.

As stated, the zone connectors included within the strategic modelling are inconsistent with the framework Masterplan layout, with **Paddock Wood Strategic Sites Master Planning Addendum and Figure 14, Infrastructure Provision for Paddock Wood (October 2023)** showing different loading points onto the B2160, for example.

## 7. PS\_054 Development Strategy Topic Paper Addendum

From the optioneering and review stages that have taken place, Para 12.3 concludes that:

*"The further work that has been carried out in reviewing options for the strategic growth of Paddock Wood has found that it can accommodate major expansion without building homes within higher flood zones, which reduces the overall level of housing on the strategic site by some circa 1,000 dwellings, but the resultant growth, for some 2,450 dwellings, is still capable of supporting the significant improvements in community and transport infrastructure."*

The inference from the above is that the package of transport infrastructure has remain largely unchanged, albeit without affecting the viability of the (remaining) developments.

However, a lower number of housing would lead to a reduction in residual vehicular trips, which would lead to a lower impact overall, and thus a reduced need for road-based engineering works.

Para 5.20 itself states that :

*"It is recognised that under a lower growth scenario option for the local plan (No Tudeley Village and a reduction of houses at PWeC) there will still inevitably be impact on the highway network. Nevertheless factoring in a reasonable level of sustainable transport related modal shift away from car use, and the improvement of certain junctions and delivery of road infrastructure projects will ensure that the road network continues to function within capacity at respective pressure points, whilst allowing the growth to come forward."*

From the perspective of reductions in vehicular trips, Para 5.10 confirms the parameters included within the modelling, while Para 5.11 states that:

*"The Stage 3 work continued in two parts. Part one assessed the respective reduction in traffic flows based on sustainable transport assumptions that have been discussed with consultants Sweco, National Highways and KCC Highways and are set out in the Sustainable transport Note [PS\_053]. The level of detail which identifies the shift from car use to sustainable modes (public transport, cycling and walking) or modal shift is integral to sustainable development and the strategic growth being modelled."*

The above provide an indication as to the level of modal shift that is expected to be achieved by the Paddock Wood and East Capel allocation, in tandem with the efforts that KCC would also need to implement across the town.

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### **A228 Colts Hill Bypass**

When discussing the merits of the Five Oaks Green Bypass (FOGB), the report stated in Para 3.48 that:

*"The Tudeley Village promoters have argued that development at Paddock Wood contributes materially to the need for the FOG Bypass (and argue for cost sharing as a result). However, the same may be said of the need for A228 improvements."*

The implies that the need for the A228 Colts Hill improvements were not considered to be related solely to the strategic development allocations at Paddock Wood and East Capel. The removal of the Tudeley Garden Village from the Local Plan does not change the fact that the sole responsibility for the A228 scheme would itself not rest on the strategic allocations at Paddock Wood either, and that some form of external funding should be identified in view of its wider benefits.

### **Public Transport**

Para 5.14 states that:

*"Recognising that the strategic sites are some 15 -20 minutes walking time from the town centre (see LCWIP, Figure 4-18), the street network is designed to allow a Town Bus loop to operate via bus gates at key points into them and connecting them to the town centre, northern employment area and railway station. Much of the highways and transport infrastructure identified in the masterplanning work is expected to be provided as part of the development of the sites."*

While each of the projected developments within Paddock Wood and East Capel can accommodate the means of physically accommodating buses, no decision has been taken as to whether a looping service would be the preferred option, based on the viability assessment carried out in the [PS\\_041- Paddock Wood Bus Service Options \(October 2023\)](#) report.

There should also be some recognition that alternative public transport options could also consider more innovative solutions such as Demand Responsive Transport (DRT) systems and that the strategy should be flexible enough to consider this form of public transport, rather than be wedded to standard fixed route services.

The suggestion of running a DRT service is covered within the [PS\\_041- Paddock Wood Bus Service Options \(October 2023\)](#), as an effective cost saving method when a fixed route bus service cannot be justified by the patronage, such as in the evening and weekends.

However, DRT could also offer a potential alternative at other times, in the event that the patronage resulting from the developments is not able to sustain fixed route services on an on-going basis.

**8. PS\_047-TW Stage 1 Technical Note Revision (August 2023), PS\_048 TW Local Plan Stage 2 Reporting (August 2023), PS\_049 TW Local Plan Stage 3 Modal Shift Impact Reporting (September 2023), PS\_059 Tunbridge Wells Local Plan Stage 3 Part 2 Outcomes (November 2023)**

As noted within the *Access and Movement Report (November 2023)*, the trip generation exercise undertaken by Sweco appears to have adopted robust assumptions, with no allowances made for internalisation of trips. Within the report, it is in Para 3.2.5 stated:

*"The vision of the TWBC Local Plan anticipates that there will be internal trips being undertaken by residents within Paddock Wood and east Capel which have not been accounted for, and that these can be undertaken mostly by walking or cycling. It is the aspiration that most, if not all trips for the primary school and sport facilities will take place internally within Paddock Wood and east Capel and wouldn't interact with the highway network assessed by SWECO."*

Some mode share and internalisation has been included within the mitigation scenarios, however this is not site- or land use specific, but this is instead applied across the Paddock Wood zone.

Additionally, no allowance has been made for inter-linked trips or home-working and the NTEM Version 7.2 growth factors have been used as opposed to the latest Version 8.

KCC provided the following concern with using the V7.2 growth factors over the V8 factors:

*"It is robust but if that level of growth is unlikely then there will be unnecessary engineering/mitigation."*

Within a sensitivity test, Sweco confirmed that the V7.2 growth factors were higher, but not significantly so and, therefore, these have been retained within the revised modelling.

The highway modelling undertaken by SWECO on behalf of TWBC used a SATURN model, which is capable of modelling the effects of congestion and constraints on the highway network and the re-routing trips that would occur as a result.

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It is customary for such modelling outputs to be presented with reference to 'Actual' flows as opposed to 'Demand' flows. 'Actual' flows represent the forecast traffic volume anticipated on a given link whereas 'Demand' flows present what would be on the link should there be no congestion or constraints to the link.

The results provided within the [PS\\_059 Tunbridge Wells Local Plan Stage 3 Part 2 Outcomes \(November 2023\)](#) report are presented in terms of 'Demand' flows. This approach is more consistent with a traditional 'Predict and Provide' approach, which has the potential to lead to the over provision of Highway Infrastructure.

Instead, the current transport planning paradigm that should be promoted is a 'Decide and Deliver'. This envisages a 'visioning' of what transport environment should be, with measures aimed to achieve that. In this respect, some level of congestion can be considered acceptable, where it helps to achieve preferential modal shift to others modes of transport.

The absence of 'Actual' flow values in Table 4 (A228 and B2017 link capacity analysis) complete and associated analysis does not allow for a sufficient or effective understanding to be gained on the effect of the infrastructure presented.

In particular, the requirement for a version of the A228 Colts Hill Bypass (Norther Section = off-line, Southern Section = on-line) continues to be included within the Local Plan evidence base as a suggested requirement of Local Plan growth without, however, presenting the effect of this mitigation in terms of Actual Flows (but only the demand placed upon it).

Notwithstanding this, it is recognised within the report that:

*"Stantec have designed up the Colts Hill Bypass link for the area that links into a potentially expanded Badsell Roundabout. The trigger point is estimated to be approximately 2,000 dwellings."*

The Revised Draft Local Plan allows for a revised total of 2,633 dwellings at Paddock Wood and East Capel, which is not significantly higher than the 2,000 dwelling trigger point stated as the trigger point for the Colts Hill Bypass.

In turn, Table 8 ('Infrastructure Schedule') contained within the [PS\\_046 Strategic Sites Masterplanning and Infrastructure Study \(October 2023\)](#) suggests a 'Medium Term' delivery, which is in consistent with the longer-term outlook above. This timing could be revised.

However, on the basis of the evidence presented, it cannot categorically be stated with any degree of confidence that the A228 Colts Hill Bypass is solely a requirement of the strategic allocations, when its trigger point could realistically post-date the period of the Local Plan.

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In terms of wider highway management, it is not doubted that the Colts Hill bypass may provide some benefit to the wider network, however the Local Plan must adopt a forward-thinking approach regarding the creation of new road infrastructure and prioritise the implementation of sustainable transport schemes, particularly where other assumptions have been based on securing higher level of modal shift.

**9. PS\_060 Paddock Wood and east Capel Access and movement report (November 2023)**

**Trip Generation**

It is clear that the report places a significant emphasis on trip reduction through an account of internalisation and modal shift.

It describes the modelling assessment undertaken by Sweco, on behalf of TWBC, as being 'robust' on account of its not taking into account the potential for internal movements, inter-linked trips or the potential increases in home-working.

It also notes that any assumption relating to modal shift was only taken into account within the 'with mitigation' modelling scenario, with estimate of between 4-9% applied (PS\_049TW Local Plan Stage 3 Modal Shift Impact Reporting). This appears to be applied to all trips within Paddock Wood, and not just the additional development trips.

While recognised as being robust, there does not appear to be any need at this stage to necessarily depart from the vehicular trip generation shown in Table 3.1 Vehicle Trip Generation for Residential Units, which for NW Paddock Wood would be as follows:

Dwellings	Zone	AM			PM		
		Dep	Arr	2-way	Dep	Arr	2-way
771	231	87	33	120	36	85	121
	308	116	44	160	47	114	161
Total		<b>203</b>	<b>77</b>	<b>280</b>	<b>83</b>	<b>199</b>	<b>282</b>

In defining the assumptions to be used in the Transport Assessment for NW Paddock Wood, it may be that some reductions to the above to reflect specific on-site provision of facilities or infrastructure.



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### **Public transport**

It is understood that WSP has prepared a report which looks at the options for providing bus transport to support the development of Paddock Wood and east Capel within the Local Plan.

A separate review of this report suggests that the options cannot be delivered commercially following the build-out of all developments, without a more significant review of what frequency can be achieved, or whether the Bus Loop is the most efficient way of serving the main facilities within the town.

Due to the location of the sites (surrounding the outskirts of existing Paddock Wood), the Stantec report recognised that the proximity of Paddock Wood railway station means that one could see this mode play a more important part of the overall mix of travel choices available to future residents.

Crest is committed to ensuring the maximum level of accessibility from the NW Paddock Wood development to the railway station.

### **Cycling**

It is noted that the Stantec report refers to the [PJA Report Local Cycling and Walking Infrastructure Plan \(LCWIP\): Phase 2 Evidence Base for Pre-Submission Local Plan \(March 2021\)](#).

The study identifies where there are gaps in the infrastructure and what would be required to provide a network of comprehensive routes serving the wider town.

The use of the Propensity to Cycle Tool (PCT) that the Government target sees a 2% increase in cycle trips compared to the 2011 Census (1% to 3%).

While Stantec recognises that the vision for the Tunbridge Wells Local Plan is to be more ambitious than this, it does not state how this would be achieved, or whether it would be realistic for the area.

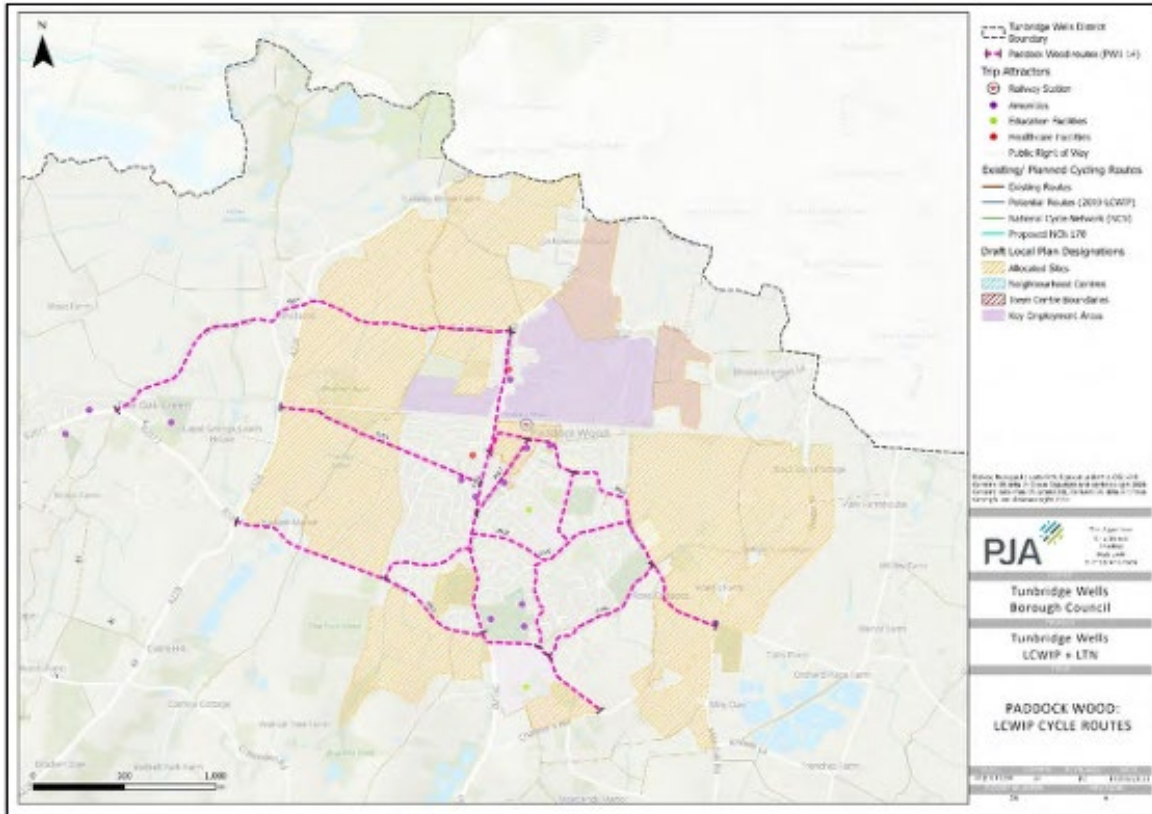
For Paddock Wood, the recommendations of the LCWIP are broken down into Local Routes and Inter-Urban Routes.

#### *Local Routes*

The extract for the Local Cycle Routes is shown below with the most relevant to the NW Paddock Wood strategic allocation being the East-West connection through the site from B2160 Maidstone Road and the A228 Whetsted Road.

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Replicated from Table 5.8

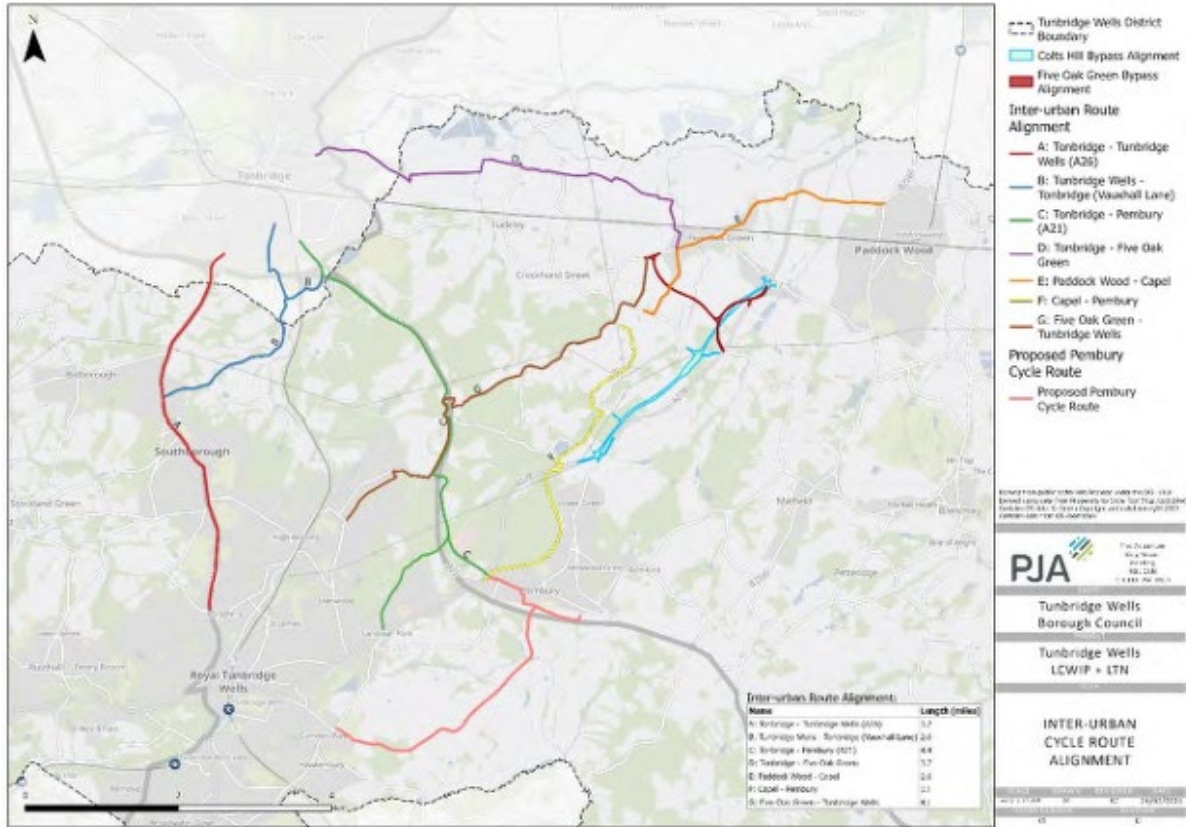
Within the scope of the PJA Study, no specific responsibility is attached to the delivery of the all of the identified routes, nor is there any suggestion that there would necessarily all be functionally linked to the identified development(s). The Study, after all, concerns the propensity for all users within Paddock Wood, rather than those specifically associated with the new strategic allocations.

### Inter-urban Routes

From the perspective of the inter-urban routes, the link between the new developments and the need for improvements is diluted further, as the number of cyclists is likely to be much lower than for intra-Paddock Wood users.

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Replicated from Table 5.8

The above provides a useful typology-related assessment of the inter-urban routes between Paddock Wood and Tunbridge Wells. It defines for 'Route E Paddock Wood – Capel' the following improvements:

- *WT176 east of Maidstone Road will require conversion from a Public Footpath to enable cycle and equestrian access. This section falls within the proposed development parcels around Paddock Wood and therefore is likely to be incorporated within those masterplans.*
- *A crossing will be required to enable safe at-grade crossing of the Maidstone Road for both pedestrians and cyclists on WT176. The recommendation is that this crossing is installed south of the Capel Cottage Garden Nursery. To enable installation of an at-grade crossing, the Maidstone Road speed Limit would need to be reduced to a minimum 50mph (ideally 40mph) supported with installation of footway on both sides of the Maidstone Road to connect the crossing.*
- *There is a short section of public footpath (WT176) between Whetsted Road and Maidstone Road which will need to be reviewed for access agreements as this forms the most direct and convenient connection between the two main roads.*
- *Whetsted Road (between Maidstone Road and Five Oak Green) is a semi-rural/residential 400m section of route however it has a 60mph speed limit which severely undermines the route's comfort and attractiveness for cycling.*

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*The recommendation is to extend the 30mph speed limit east from Five Oak Green to the junction with Whetsted Road.*

- *Rather than focussing exclusively on walking and cycling improvements, the recommendation is to develop a more holistic approach which promotes Five Oak Green Road and Whetsted Road as the village centre rather the main thoroughfare. This approach should extend north of the railway line to include Whetsted Road up to the village boundary. This approach will need further exploration, but it is envisaged that the key design features would include Gateway features on key approaches to village, Installation of controlled crossings on Five Oak Green Road, Public realm scheme at centre of village at Five Oak 'Green' and localised footway widening*
- *The northern half of Sychem Lane is a residential street and comfortable to cycle on however the southern half is a narrow rural lane with a 60mph speed limit. It is recommended that a 'Quiet Lanes' treatment is used on this section of Sychem Lane including gateway treatments at each end of the lane to remind vehicles of the nature of the road and to extend the 30mph speed limit south to Alders Road. A modal filter could also be considered which would remove through traffic and therefore improve conditions for walking and cycling along the lane"*

From the above list, many of the interventions involve aspects which it would be difficult for any one development promoter to facilitate, including reductions in vehicular speed limit, conversion of existing Public Rights of Way (PRoWs), or neighbourhood-led public realm schemes.

It is therefore uncertain, how much of these inter-urban initiatives can be attained solely in support of strategic allocation contained within the Tunbridge Wells Local Plan.

The Strategic Sites Masterplanning and Infrastructure Study Paddock Wood Growth Follow-on Study (October 2023) does itself not list any off-sites inter-urban routes within its list of 'Sustainable Transport' measures within Table 8 – Infrastructure Schedule. Paragraph 2.30 of the report states:

*"The Tunbridge Wells LCWIP (Part 2) has developed detailed proposals for Paddock Wood, and was published after the February 2021 report. These broadly relate to the existing built up area and where connections can be made to the growth areas. As part of the previous study, liaison was undertaken with the LCWIP team to ensure that inter-urban routes and Paddock Wood infrastructure was aligned."*

The above would suggest a requirement to 'align' with proposals for inter-urban routes, rather than a requirement to deliver these.

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In addition to the LCWIP proposals for within Paddock Wood itself, which continue to be included within the Infrastructure Delivery Plan, the Stantec Report does place the responsibility of the developments to encourage cycle travel as much as possible through the individual Travel Plans. Crest supports this.

### **A228 Colts Hill Bypass**

The report suggests some progression in the consideration of the A228 Colts Hill Bypass which it cites as being a 'Previous KCC Scheme'.

The prior [Access and Movement report Access and Movement Report Tunbridge Wells Local Plan: Paddock Wood and east Capel \(November 2020\)](#) concluded that the southern section of the A228 from Alders Road junction should remain online, while the section north would be offline to the west of the row of cottages.

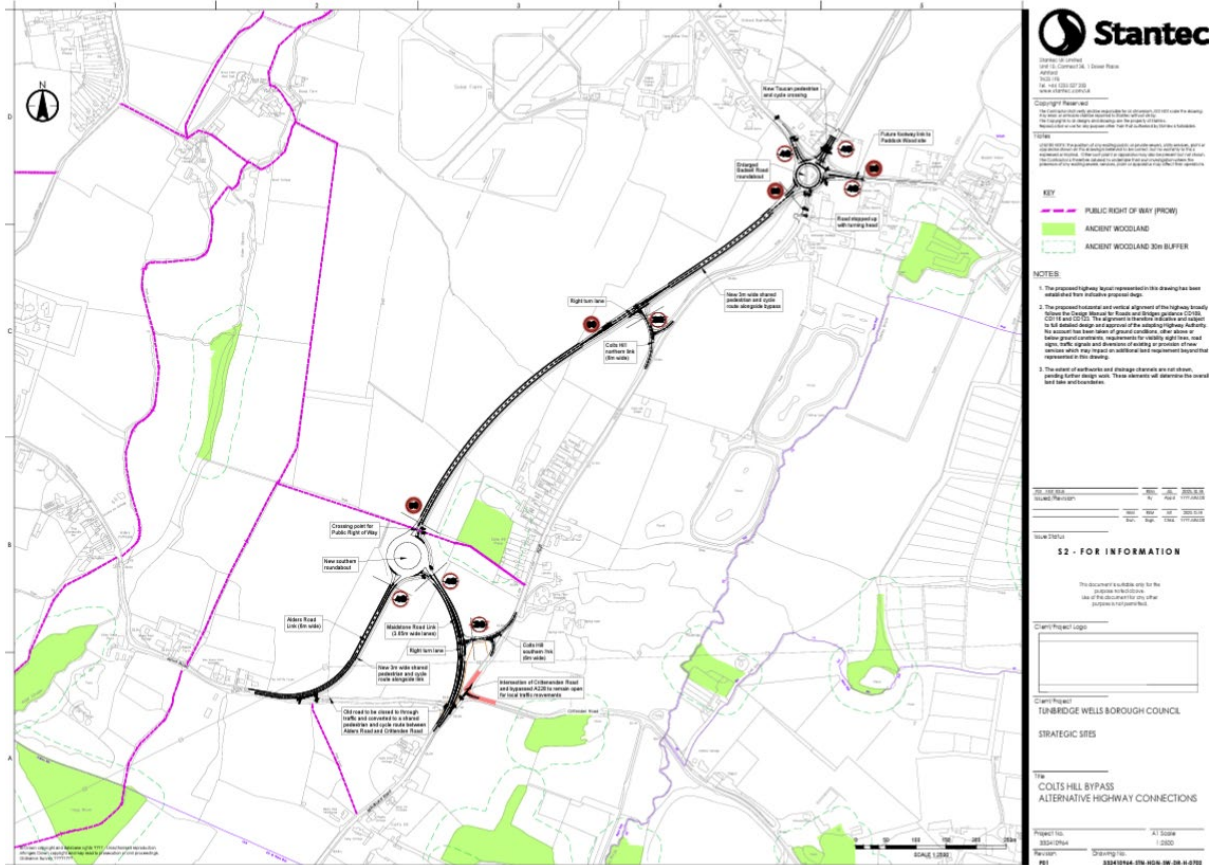
Through this updated report, an alternative configuration for the Bypass scheme has been produced by Stantec, which would reduce the overall footprint of the scheme, in view of the greenbelt nature of the proposals.

The Drawing [332610964-STN-HGN-SW-DR-H-0702](#): Colts Hill Bypass Alternative Highway Connections is shown below:



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The above option partly follows the route of the bypass scheme proposed by Kent County Council, but with a less intrusive impact on the surrounding area.

The report states in Para 5.3.5 that:

*"This option provides appropriate highway access to the development sites without adding traffic to Colts Hill, which currently is very width constrained and historically has experienced road safety issues. It is likely to reduce traffic on Colts Hill in the vicinity of the row of cottages which is likely to reduce the risk of collisions in this area. This proposal includes infrastructure for active travel by providing pedestrian facilities and segregated cycle facilities and so encourages travel by sustainable modes."*

Crest' observations on the above are that:

- As well meaning as the A228 Colts Hill Improvement Scheme is, this is a long-standing KCC aspiration that it could look to implement regardless of any developments coming forward at Paddock Wood.

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- No causality has been presented by TWBC between the impact of the development allocations at Paddock Wood and the 'need' for the scheme. In fact, the Stantec report suggests that further reductions in traffic could be accounted for, as part of the sustainable transport improvements planned for the town. These would in fact reduce the need for additional highway infrastructure further.
- There would undoubtedly be road safety benefits arising from the scheme.
- The Stantec-devised scheme would reduce the cost of providing the A228 Colts Hill Bypass scheme, owing to its lower footprint.
- There would seem to be some duplication in cycling infrastructure, given the inclusion of a 3m shared footway/cycleway along the re-aligned A228 given that the pre-existing A228 alignment could be re-purposed to provide a cycling friendly street
- The cost of the scheme remains uncertain, given that the infrastructure proposals have not benefitted from any 3-D ground modelling that could have allowed for topographical level changes and ground conditions to be better understood.
- The justification and viability of the scheme as it pertains to the Local Plan therefore remain important question marks for the examination.

### **Other Mitigation**

The report provides some indication on which other off-site junctions are likely to require "some form of [physical] improvement" to accommodate the impact of the Local Plan:

- A228 Whetsted Road/A228 Bransbridges Road/B2160 Maidstone Road roundabout
- A228 Maidstone Road / Whetsted Road priority roundabout junction
- A228 Maidstone Road / B2017 Badsell Road (Colts Hill) roundabout
- B2017 Badsell Road / B2160 Maidstone Road signalised junction
- B2160 Maidstone Road / Commercial Road priority junction
- Shuttle signal Bridge Paddock Wood High Street

While the exact operational performance of the above is said to fall within the realms of Transport Assessments, it is noted in Para 5.4.5 that:

*"Mitigation requirements as part of the Local Plan would be identified by SWECO"*

The above is taken to mean that schemes for the above would be defined through the Local Plan, based on the assessment of the cumulative impact of strategic allocations, and that the individual developments will be expected to make a financial contribution towards those works.

## TECHNICAL MEMORANDUM

Prepared on behalf of Crest Nicholson

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If this is the case, the schemes should be developed to a sufficient stage where costs can be attributed, so that they can be included within the Infrastructure Delivery Plan (IDP) or similar.

It is not sufficient to expect Transport Assessments, submitted by individual applicants, to define those schemes, particularly if any require local authority powers to deliver (e.g. land outside highway boundary).

The alternative is that individual developments can, through their respective Transport Assessments specify 'interim' or 'incremental' improvements that can deal with their own impacts, with a proportionate 'proxy' contribution being made towards any more comprehensive improvement at the aforementioned locations.

It is also noted in [Table 5.1 Recommended Transport Infrastructure – Paddock Wood and east Capel](#) that a further list of suggested improvements is pertaining to each masterplan areas is proposed on-site.

For both the Crest and Dandara land, a mention is made of a 'Pedestrian/cycle Bridge across Railway'. This should be identified as a strategic improvement for the town, not linked specifically to these two developments.

The benefit of such a strategic designation is to secure the necessary planning policy support for the implementation of the foot/cycle bridge, given that participation from Network Rail (NR) would be require to effect the improvements.

While there is a generally provision by NR to seek the closure/replacement of at-grade railway crossing, to reduce the risk of accidents, any development-specific requirement, without such policy backing, could introduce an element of 'ransom' by NR for use of its land (or rights over the railway) which could unduly affect the viability of developments.

It is therefore recommended that the 'Pedestrian/cycle Bridge across Railway' be moved to the Off Site Pedestrian and Cycle Improvements part of Table 5.1