APPENDIX 1 – PADDOCK WOOD TOWN COUNCIL COMMENTS ON THE LOCAL PLAN'S 'WALKING AND CYCLING STRATEGY' FOR PADDOCK WOOD AND EAST CAPEL

October 2024

Prepared on behalf of Paddock Wood Town Council by
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1. Introduction

1.1. The Town Council considers the walking and cycling infrastructure strategy and proposals for Paddock Wood and east Capel as set out in the Local Plan and supporting evidence base to be incoherent and unsound.

1.2. Whilst there are a number of evidence base documents relating to this topic and references in the Local Plan to this infrastructure there is not a clear strategy that will help facilitate the type of infrastructure required to realise a safe, healthy and accessible Paddock Wood.

1.3. As we can clearly see in the **Tunbridge Wells Local Plan Modelling - Modal Shift Analysis**, the success of the Local Plan and the proposed growth in Paddock Wood is highly dependent on significant levels of modal shift and sustainable transport measures to avoid additional congestion in and around the town and ensure that the infrastructure caters the everyday needs of residents.

1.4. The Town Council and its consultants wish to work closely with TWBC, KCC and the developers of the strategic sites on preparing a 'walking and cycling strategy' for the town and growth areas that could genuinely bring about a shift to more sustainable and active travel. We would like to share these more detailed ideas and proposals as part of an ongoing process as soon as possible.

1.5. Please note that we provide our detailed responses to the draft changes to the Local Plan policies and to the evidence base in our main representations document.

1. Local Plan Policy Context

Local Plan

1.1. The Local Plan puts a strong emphasis on sustainable transport modes to mitigate the extensive proposed growth in the borough as is set out in Policy STR 6 (Transport and Parking).

> *"Future development will be delivered within close proximity to accessible locations of existing settlements across the borough to help reduce the need to travel. Where travel is necessary, active travel (walking and cycling) will be prioritised, particularly in the urban areas, and then public transport (rail, bus, car club, car share, and taxi) as an alternative means of transport to the private car."*

1.2. Thus, the **Tunbridge Wells Local Plan Modelling - Modal Shift Analysis** sets out the assumption of a *"10% reduction on car (driver) trips with origins and destinations within an area regarded as a "Sustainable Transport Zone" (STZ)"* which includes a triangular area between Tonbridge, Paddock Wood and Royal Tonbridge Wells.

1.3. Policy TP 1 (Transport Assessments, Travel Plans, and Mitigation) and TP 2 (Transport Design and Accessibility) set out further requirements for new developments in relation to transport modes and infrastructure.

1.4. The **Post Hearing Stage 3 - Revised wording for Policy STR/SS 1 - The Strategy for Paddock Wood including Land at east Capel** document states the proposed growth of "approximately 2450 dwellings and associated infrastructure" in Paddock Wood.

1.5. The Policy refers to the **Strategic Sites Masterplanning and Infrastructure Study** to inform the proposed developments and associated infrastructure in more detail.

1.6. The Policy states that "*The development proposals as a whole shall: […](k) 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;*".

1.7. The Policy also emphasises that *"Each Masterplan shall: […] (e) show how the development will incorporate the full range of sustainable transport measures, including the proposed access and highway and transport links, including 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 wherever possible); (g) provide convenient and highly legible pedestrian and cycle links through the allocated site to connect the Parcels and integrate the new communities and provide good pedestrian access to Paddock Wood Town Centre and surrounding areas;".*

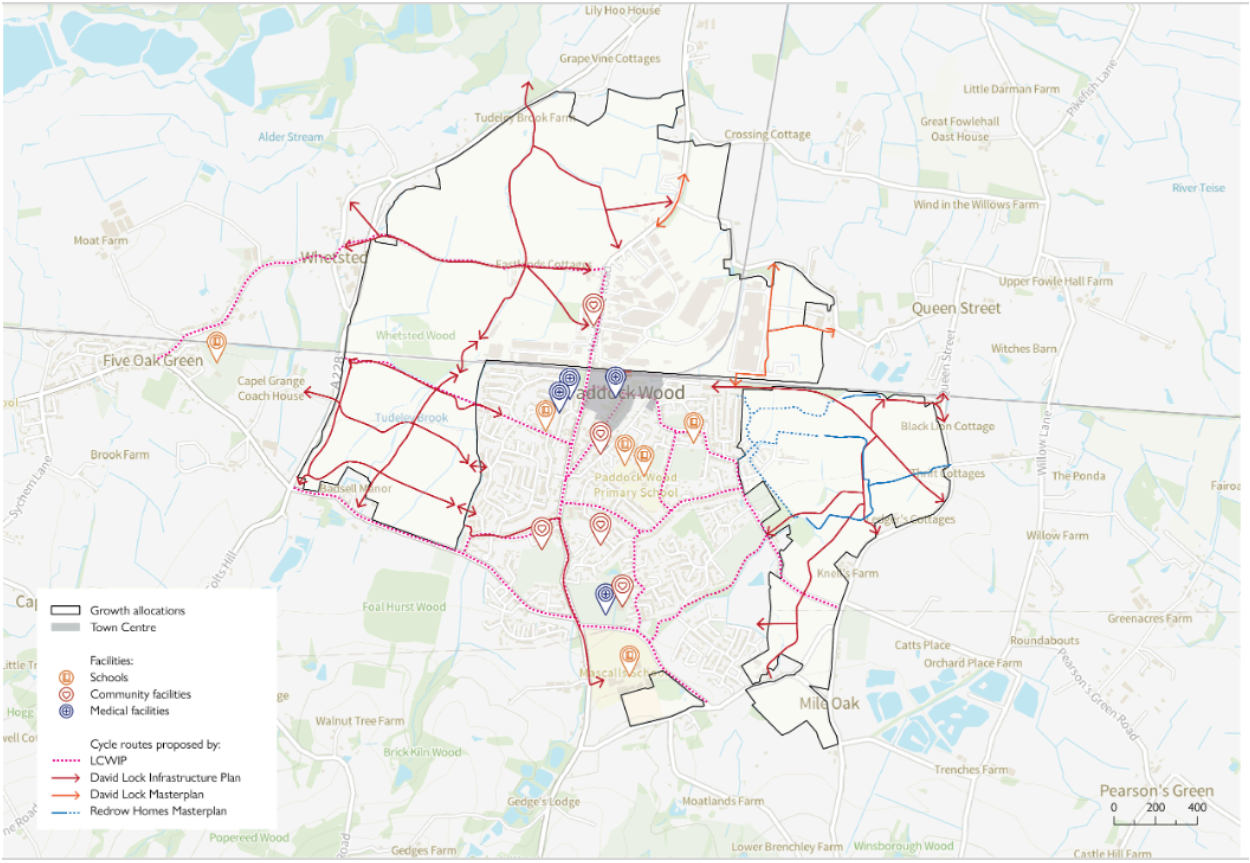
1.8. Point 14 of the Policy also sets out that planning obligations for the development of all Parcels will include proportionate contributions for the implementation necessary infrastructure as set out identified in the **Infrastructure Delivery Plan (IDP)**. As stated in Point 15, *"infrastructure to be funded shall include but may not be limited to: […] (d) cycle and pedestrian links across the development parcels with links to the existing settlement including a north-south pedestrian and cycle bridge over the railway line linking the North-Western and South Western Parcels, and links to adjoining neighbourhoods and access to community facilities;"*.

2. Overarching Walking and Cycling Strategy?

2.1. We have used the evidence base documents namely the Council's Local Cycling and Walking Infrastructure Plan Phase 2 (LCWIP) and the mapping from the Strategic Sites Masterplanning and Infrastructure Study (2023) as well as the Redrow Homes 'Masterplan' from its planning application and placed these all on one map / plan to try and comprehend what walking and cycling infrastructure is actually planned. This plan is provided below for illustrative purposes. Please see the individual maps for each of these documents at the back of this Appendix.

2.2. In order to understand how this link up with the key pieces of existing infrastructure and community facilities we included the location of schools, community facilities and health/medical facilities and the railway station.

2.3. As one can see from the plan below, there is no coherent strategy for how the proposed development at Paddock Wood will link up with the existing settlement and its infrastructure.



Plan to illustrate various walking and cycling routes (within the existing settlement and proposed allocation) proposed in various documents and location of key facilities. Prepared by Troy Planning + Design

Links with the existing settlement of Paddock Wood and its facilities

2.4. The map above includes the LCWIP routes which include routes within the existing town and some links to the surrounding countryside. However, these routes within the existing town <u>are not</u> shown on the Strategic Sites and Masterplanning document and only exist on the LCWIP. So, as it currently stands the Masterplan / Infrastructure Plan being relied on by TWBC only provides walking and cycling routes <u>to the edge of the existing settlement</u> and does not demonstrate how the proposed routes will link safely and sustainably with the existing network which is critical to ensure that these are viable routes and not just theoretical lines and arrows.

2.5. To illustrate this, we prepared a plan illustrating the routes shown on the Masterplanning and Infrastructure document with question marks indicated in a few places where it is unclear how these routes will actually link up with the existing network.

Plan to illustrate unclear walking and cycling routes between allocation and existing settlement / facilities. Prepared by Troy Planning + Design

2.6. To illustrate this, we prepared a plan illustrating the routes shown on the Masterplanning and Infrastructure document with question marks indicated in a few places where it is unclear how these routes will actually link up with the existing network.

2.7. The LCWIP (Phase 2) was informed by **DfT's publication of 'Gear Change'** and the revised **Local Transport Note 1/20 'Cycle Infrastructure** which introduce Low Traffic Neighbourhoods.

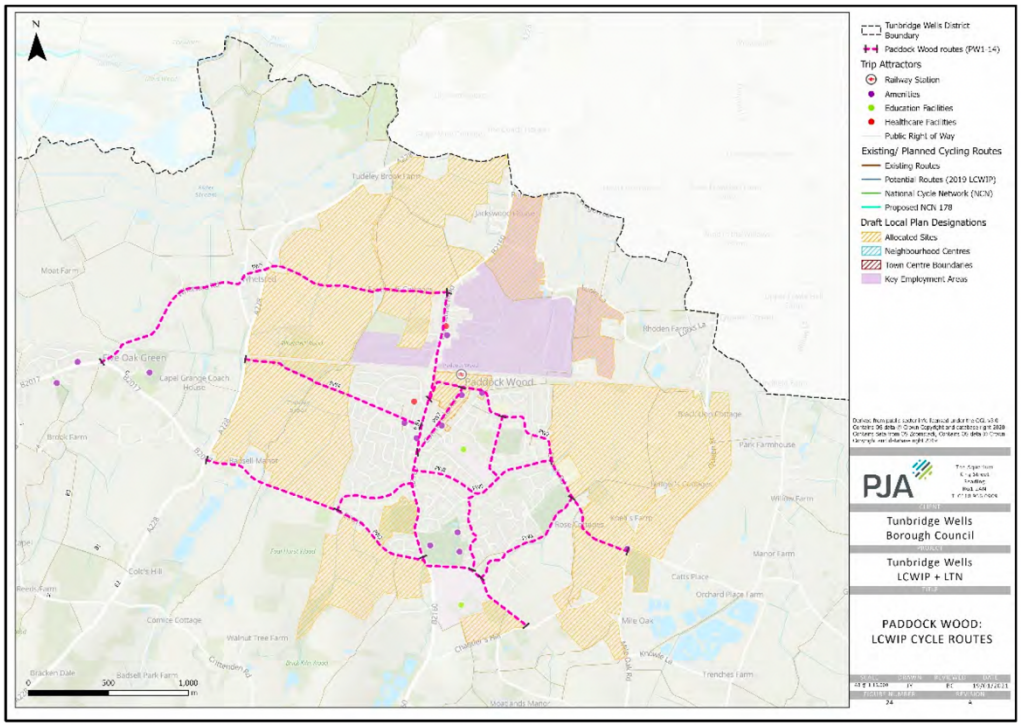
2.8. The LCWIP provides a standalone section for Paddock Wood which an analysis and a list of recommended routes for walking and cycling within the Town - see the map below *'Paddock Wood –LCWIP Cycling Network'*

2.9. The Cycling Network was identified through the "Route Selection Tool" set out in the DfT LCWIP process guidance. *"The Route Selection Tool (RST) is an appraisal methodology that allows practitioners to determine the best route to fulfil a particular straight line corridor, referencing against existing conditions and the shortest available route. It considers five important criteria that determine the quality of a cycling route (directness, safety, gradient, connectivity, and comfort) plus junction safety."*

2.10. The LCWIP sets out overarching design principles and recommendations as follows:

- "*Lack of dedicated cycling facilities […] The recommendation is to provide protected cycle facilities on routes where cyclists would be mixing with vehicle flows of >500 vehicles per hour.*"

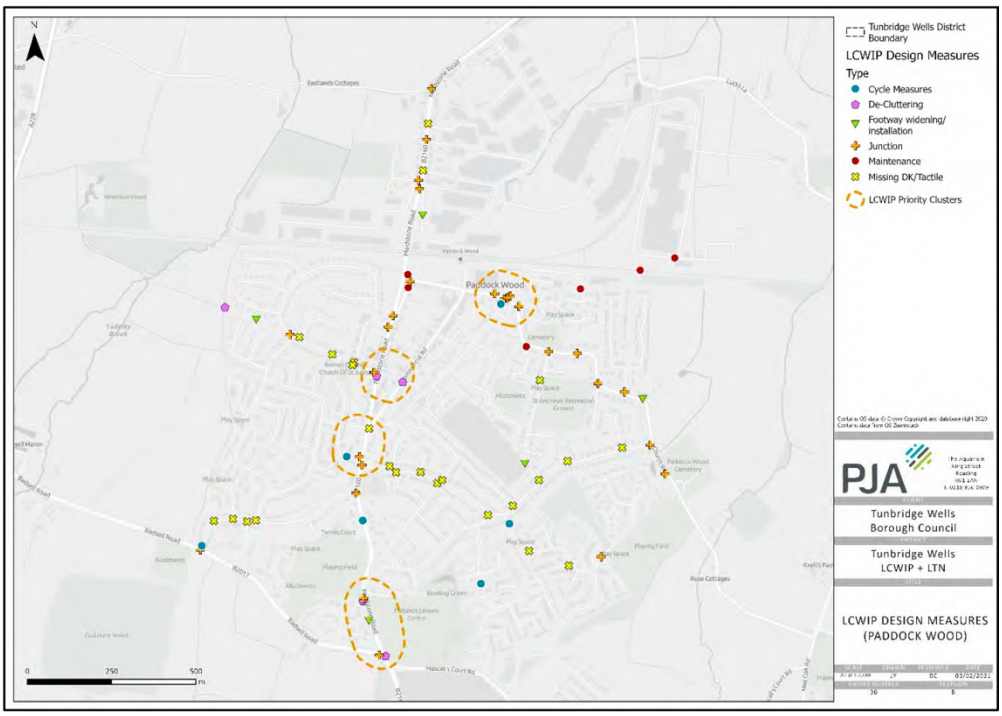
- *"Junctions […] A key recommendation therefore is to improve key junctions/crossings in the town to improve connectivity and permeability for cycling. Many of the junctions identified for improvements also require improvements for pedestrians too."*
- *"Mixing with general traffic […] The LCWIP recommendation is to provide protected cycle facilities on these routes where feasible."*
- *"Limited Porosity […] Developing Low Traffic Neighbourhood in the town would help to address the issues of cyclists mixing with general traffic and helping to improve the overall permeability of the town's cycle network."*



Paddock Wood LCWIP Cycle Routes

2.11. At Paragraph 4.10 and 4.11 the LCWIP provides a number of design recommendation for each identified walking and cycling route and organises their importance and

urgency in so-called 'Priority Clusters' as can be seen in the map below. The text states: "*The LCWIP design proposals have been shared and co-ordinated with the Strategic Sites Infrastructure Framework.*" and thus, emphasises that the LCWIP has informed the **Strategic Sites Masterplanning and Infrastructure Study** prepared by David Lock Associates.



Paddock Wood LCWIP Design Measures

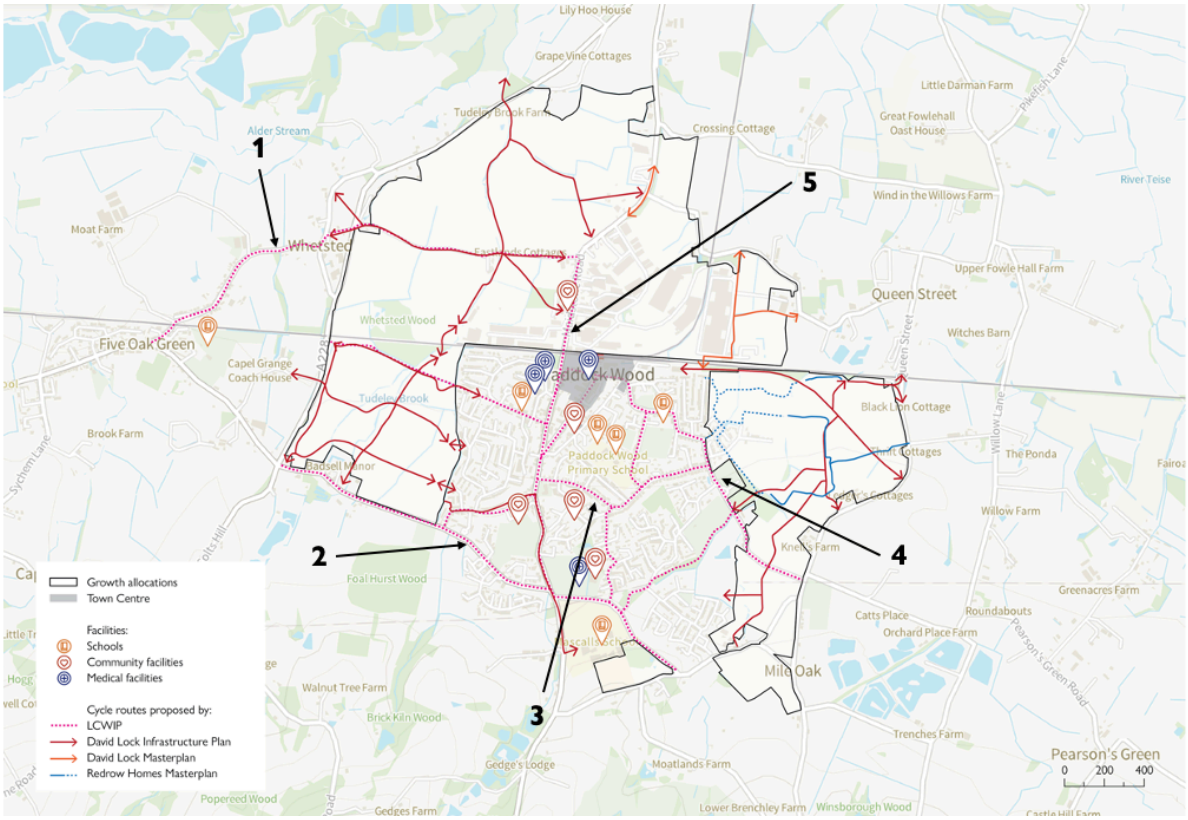
2.12. According to the LCWIP, the proposed Structure Plan, Infrastructure Plan and a Masterplan that has been developed as part of a Planning Application for one of the proposed sites, were informed by walking and cycling routes laid out in the LCWIP. However, no reference is made in the document. This could be due to the fact that the LCWIP Phase 2 document was released in March 2021 while the first version of the Strategic Sites Masterplanning and Infrastructure Study was already released in February 2021.

Links with the surrounding countryside

2.13. In terms of the links to the surrounding rural areas there are equal concerns about how viable the routes and connections are. They are for the most part arrows point outwardly from the town but the full route and improvements to road safety for walking and cycling are unclear and have not been demonstrated.

Measures to adapt the existing road network

2.14. We question how the existing road network will be adapted in such a way that will achieve a modal shift away from the personal automobile to the extent that TWBC's transport modelling assumes. We have selected five of the key routes identified by the Council and taken snapshots of the existing road layout to illustrate the challenges.



Route / Photo Reference Map. Prepared by Troy Planning + Design

Route 1: Five Oak Green – Whetsted – Maidstone Road



Route 1 is the link proposed in the LCWIP between Paddock Wood and Five Oak Green which effectively a country lane.

Route 2: A228 – B2017 – Mascalls Court Road



Route 2 is the link proposed in the LCWIP which would effectively link the south west parcel to Mascalls Academy. Yet it is difficult to see how this route will be adapted to be a safe walking and cycling route.

Route 3: Maidstone Road – Warrington Road – Church Road



Route 3 is more of an internal route identified in the LCWIP which appears to have more opportunities for adaption for a safe walking and cycling route however it is still unclear how this will be achieved.

Route 4: Queen Street – Church Road – Station Road



Route 4 is also an internal route identified in the LCWIP however does have segments that are quite narrow.

Route 5: Maidstone Road – B2160



Route 5 is a key north-south route in the LCWIP linking the areas north of Paddock Wood and the rest of the town to the south including over the railway line which also include traffic to and from the employment parks. It is unclear how this will be adapted.

3. Conclusion

3.1. In order for there to be a step change in active travel in Paddock Wood existing and new residents will need to be heavily persuaded by the introduction of an integrated, quick, attractive and safe walking and cycling network. This means both the internal connections and connections between the growth allocations should create a preferable and easy choice for residents compared to driving a car.

3.2. The main requirements of cycling infrastructure are issued by the Dutch institute of traffic design (CROW), which is the basis for the UK Guidance **Cycle Infrastructure Design (LTN 1/20).**

- **Safe:** The safety of the trail for traffic is crucial. This involves evaluating how different types of transport users are mixed on the trail and assessing the safety of intersections. The minimum requirement for a safe intersection includes the presence of a median, allowing people to cross a busy road in phases. A grade-separated intersection is a safer and more appealing option, though it comes with a higher cost.
- **Comfortable:** The route must provide comfort for all users. Factors such as potential stops at intersections, the quality of the surface, obstacles along the way, and noise levels are considered to ensure a pleasant experience.
- **Attractive:** The attractiveness of the route plays a key role in its usability. This includes evaluating whether the route runs parallel to major roads or passes through greener, more scenic environments.
- **Direct:** The route should offer a direct connection between points, minimizing both travel distance and travel time. This can be achieved, for example, by avoiding busy intersections. The deviation factor is considered here, which is the ratio of the actual cycling route distance compared to the straight-line distance.
- **Coherent:** The cycling network should be logical and provide good connectivity to various destinations. It is important that the network integrates well with other routes, ensuring a seamless connection for cyclists traveling through different areas.

3.3. As overarching strategy, we suggest that solutions for Paddock Wood should focus on delivering on these requirements for the new and existing development of the town.

3.4. The Town Council and its consultants wishes to work closely with TWBC, KCC and the developers of the strategic sites on preparing a ‘walking and cycling strategy’ for the town and growth areas that could genuinely bring about a shift to more sustainable and active travel. We would like to share these more detailed ideas and proposals as part of an ongoing process as soon as possible.