

Paddock Wood Town Council

Matter 12 – Transport Infrastructure (Policies STR6, TP1, TP2, TP3, TP4, TP5 and TP6)

ISSUE 1 – Effects of Local Plan Growth

Q1. Have transport issues been considered at the earliest stages of plan-making, as required by paragraph 104 of the Framework?

PWTC Response:

1. This is for TWBC to answer.

Q2. How have the potential impacts of the development proposed in the Plan been tested, and how will the necessary highways mitigation be delivered? Is it clear to decision-makers, developers and local communities what will need to be provided, when and by whom?

PWTC Response:

2. It is for TWBC to answer the first question.
3. In relation to the clarity to decision-makers, developers and local communities about what will need to be provided, when and by whom the Town Council considers the plan lacks this clarity.
4. When one looks to the Council's [Infrastructure Delivery Plan \(October 2021\)](#)¹ it is vague about the actual transport / highways strategy bringing into serious doubt the deliverability of the long list of projects.
5. For example, most of the highways projects proposed for Paddock Wood & East Capel (see starting on Page 135 of the IDP) are in the 'Short' term which according to the IDP is '5 years and less' and all are classified as 'Critical' priority.
6. In the view of the Town Council the Highways proposals to mitigate for the quantum of development are totally inadequate and fail to address the fact on the ground that there is one spine road for the whole of Paddock Wood that already struggles to cope with the volume of traffic which is an existing residential road with parked cars on both sides of the road.
7. The East/West access roads of Badsell Road and Church Road are no more than narrow lanes and totally incapable of accommodating the amount of development

¹ CD 3.142

on the sites that will access and egress from them. It is clear to the Town Council that the intention is to divert development funded highways improvements away from Paddock Wood to fulfil need elsewhere rather than funding highways for the settlement itself. The Town Council feels that this is unsustainable.

8. The suggestion in various policies that the Highways demand can be mitigated by increased use of cycling and walking is rendered ridiculous by the impossibility of retrofitting cycle paths and so forth in a densely developed town where the pavement widths are insufficient for additional pedestrian use and can certainly not accommodate cycles.

Q3. *What are the reasons for the preparation and submission of the Local Plan Sensitivity Test Addendum Report and the Local Junction Capacity Sensitivity Testing Technical Note?*

PWTC Response:

9. This is for TWBC to answer, however as we have set out in previous hearing statements the late submission of these documents demonstrates that the Local Plan was lacking critical evidence for consideration by consultees at the Regulation 19 stage.

Q4. *Does the additional transport evidence support the level of growth proposed in the Local Plan and demonstrate that the necessary mitigation measures are achievable?*

PWTC Response:

10. This is for TWBC to answer.

ISSUE 2 – Transport and Accessibility

Q1. Is it clear to decision-makers, developers and local communities what is meant by ‘reasonably close proximity’ for the purposes of Policy TP2?

PWTC Response:

11. No. In the absence of such a policy the emerging Neighbourhood Plan includes a policy that says within areas of major growth all homes should be located within a 400 metre walk of a bus stop. This equates to a five-minute walk and is a well-established and well-recognised walking distance that people are willing to travel to access bus services.

Q2. What is the justification for requiring developers to fund any necessary changes to external speed limit restrictions under Policy TP2(7)?

PWTC Response:

12. The Town Council considers this to be a result of inadequate cooperation with KCC Highways in the preparation of the Local Plan. This lack of cooperation has resulted in there being no consideration of the infrastructure requirements that result from the proposed new development sites. Proper cooperation would have enabled KCC to outline these requirements for inclusion in the plan rather than delaying their identification and expecting developers to fund them at the point where an application is submitted.

Q3. What are the reasons for the suggested changes to Policy TP2? Are they necessary for soundness?

PWTC Response:

13. This is for TWBC to answer.

ISSUE 3 – Parking Standards and Public Car Parks

Q4. Paragraph 107 of the Framework states that if setting local parking standards, policies should take into account;

- **The accessibility of the development;**
- **The type, mix and use of development;**
- **The availability of and opportunities for public transport;**
- **Local car ownership levels; and**
- **The need to ensure an adequate provision of spaces for charging plug-in and ultra-low emission vehicle**

How have these factors been taken into account in setting the residential parking standards in Policy TP3?

PWTC Response:

14. This is for TWBC to answer.

Q5. Are the residential parking standards based on appropriate local evidence and are they justified for each Zone?

PWTC Response:

15. Supporting text to Policy TP3 notes that the standards are based on information from the 2011 Census. This information is out-of-date. The Census information is also based on residents living in the area at the time of the Census. The growth of Paddock Wood will accommodate a significant increase in population. The development should be designed to help create healthy lifestyles and changes in travel patterns that can be achieved. The standards need to look to the future. It is not clear how the aspirations for sustainable growth and development have been factored into the approach to setting parking standards.

Q6. Where maximum standards are concerned, paragraph 108 of the Framework states that standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.

What is the justification for requiring development proposals within Use Class C2 (and all non-residential developments) to accord with maximum standards in Kent County Council's latest guidance?

PWTC Response:

16. This is for TWBC to answer.

Q7. Is it appropriate and justified to set out future parking standards in SPDs, which, according to Policy TP3, would 'have primacy' over the requirements in the Local Plan?

PWTC Response:

17. No. For policies to have full weight they should be included in the Local Plan. It is inappropriate to defer any standards to a later date as it will undermine the potential for creating the conditions that support sustainable development now, with development supporting walking, cycling and public transport use.

Note TWBC has, over the last three years, approved a whole series of infill developments on parking and garage areas for the social housing estates held by the local housing associations. This has resulted in appalling parking congestion and pedestrian safety issues in the adjacent streets caused by the removal of all dedicated parking. Is this relevant, applicable, worth mentioning????? What policies are proposed to prevent this happening in the future on private estates?

Q8. What is the justification for the level of detail in Policy TP3? For example, what are the reasons for restricting tandem parking, specifying sizes and stating that car barns must be open on three sides?

PWTC Response:

18. Tandem parking is understood to be the provision of one parking space in front of another (as opposed to side by side). It is not understood why the Borough Council considers tandem parking to be unacceptable.

19. The quantum, location and design of parking is a major determinant on the quality of the street scene and if designed inappropriately can undermine wider place making objectives. The approach in the Local Plan requires parking to be provided on-site. For individual homes this effectively means parking being provided side-by-side. The risk inherent in the approach set out in the Local Plan is that parking visually dominates the street environment, promotes an inefficient use of land, and makes driving a convenient option, undermining initiatives to promote active

travel. This is despite Policy EN1 in the Local Plan stating that parking should not dominate the street scene nor cause harm to visual amenity. Whilst tandem parking might not be the most appropriate solution in all instances, it can be an effective way of providing parking that helps meet the design criteria of Policy EN1.

Q9. What are the reasons for seeking to safeguard public car parking spaces through Policy TP4?

PWTC Response:

20. The rationale is not clearly justified. The Local Plan states that this position will be reviewed after five-years. This will be too late. The position needs to be reviewed now to help contribute towards climate change objectives creation of healthier lifestyles, maximising the potential for active travel and use of public transport. A more proactive approach needs to be taken by the Borough Council, extending to consideration of new technologies and alternatives to the private car.
21. With the scale of growth proposed around Paddock Wood it is recognised that there will still be demand for car travel, but the conditions need to be put in place from day one that make other modes of travel a more attractive proposition on a day-to-day basis. By safeguarding the current level of provision car travel will remain too convenient. This is recognised in Policy TP3 (exceptional circumstances, Point 1) which notes that growth of Paddock Wood 'could be designed with highly sustainable transport links'. This being the case, policy should be drafted that preclude proposals coming forward that undermine the sustainability of any future growth.

ISSUE 4 – Safeguarded Infrastructure

Q1. The supporting text at paragraph 6.579 of the Plan states that an entirely ‘off-line’ route for the A228 at Colts Hill is not necessary to mitigate the impacts of proposed growth at Tudeley Village and around Paddock Wood. What are the reasons, therefore, for safeguarding the route of the ‘off-line’ scheme of the Plan?

PWTC Response:

22. The Town Council has stated in its previous representations and hearing statements that the A228 Colts Hill bypass does not benefit Paddock Wood or mitigate the strategic growth proposed at Paddock Wood, East Capel or Tudeley.

23. It is the highest cost piece of highways infrastructure proposed in the IDP (£20m) for infrastructure that the Council concedes will not benefit its largest proposed growth area(s).

Q2. Does the safeguarded route remain justified and is it deliverable?

PWTC Response:

24. The Town Council considers that TWBC’s proposed approach to Colt Hill bypass is not justified and therefore it is irrelevant whether it is deliverable.

Q3. What is the justification for safeguarding the remaining section of the A21 from the Kipping’s Cross roundabout to the Lamberhurst roundabout? How and when is this expected to be delivered?

PWTC Response:

25. No Comment.