Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Hearing Statement

Matter 6: Strategic Sites (Policies STR/SS1, STR/SS2, STR/SS3, STR/PW1 and STR/CA1) Issue 4: Paddock Wood Town Centre (Policy STR/SS2)

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Matter 6 – Strategic Sites (Policies STR/SS1, STR/SS2, STR/SS3, STR/PW1 and STR/CA1)

Issue 4 – Paddock Wood Town Centre (Policy STR/SS2)

Inspector's Question 1: [re. Paddock Wood Town Centre Framework]

Policy STR/SS2 states that the Paddock Wood Town Centre Framework Masterplan SPD will identify 'key development sites'. Is this approach justified when taking into account that the SPD will not form part of the development plan for the area?

TWBC response to Question 1

Introduction

- The transformational growth proposed around Paddock Wood and east Capel is likely to double the size of Paddock Wood from present levels. There will also be a significant increase in the provision of employment land. This presents a significant opportunity for Paddock Wood town centre.
- 2. The Council is very keen to ensure that this opportunity is seized to enable this growth to facilitate investment into the town in the most appropriate way, to enhance its vitality and viability moving forward.
- Such levels of growth demand a holistic understanding of what this might mean for the function, form, and opportunities for the town centre. Planned properly, the growth will underpin new services and an increase in activity and viability of the town centre.
 Please see paragraphs 4.38 and 4.43 of the Strategic Sites Topic Paper [CD 3.67].
- 4. This aspiration was established from the outset in David Lock Associates'(DLA) instruction in the preparation of the Strategic Sites Masterplanning and Infrastructure

Study [CD 3.66]. Indeed, part of the instruction included the preparation of a high-level masterplan for the town centre so its future revitalisation could be planned for. This is to form the basis of the preparation of the Town Centre Framework as required through Policy STR/SS2. Please see Appendix 2 of the Strategic Sites Topic Paper for the Masterplanning Brief [CD 3.67].

- 5. Given the significant opportunity presented by this growth, and the changing role and nature of town centres which have been seen across the country over recent years, exacerbated by the Covid-19 pandemic (paragraph 5.198 of the Submission Local Plan [CD 3.128]), it is considered appropriate that the Local Plan identifies provision for a more detailed Paddock Wood Town Centre Framework Masterplan SPD (referred to as the Town Centre Framework Masterplan SPD for the purposes of this Hearing Statement) to be produced. It will build upon and provide more detailed advice/guidance on Policy STR/SS2 in the Local Plan as required by the Planning Practice Guidance (PPG) (paragraph: 008 Reference ID: 61-008-20190315). The Town Centre Framework Masterplan SPD will deal with the issues as set out on page 27 of the Council's Local Development Scheme [CD 3.143]; through close consultation with the local community, Paddock Wood Town Council and Paddock Wood Neighbourhood Development Plan group.
- 6. The Town Centre Framework Masterplan SPD will build upon the policy requirements as set out in Policy STR/SS2 criteria 1-8. These establish the key land use and other parameters which will underpin the Town Centre Framework Masterplan SPD. This includes reference to the appropriate range of uses (reflecting main town centre uses as defined in the NPPF, Annex 2) and requirements for the town centre to provide a comprehensive network of pedestrian and cycle routes. It also provides for residential uses (facilitated in part through growth to the west providing betterment in flood risk terms to the town centre) to encourage activity in the town centre, enhancing vitality whilst maximising sustainable travel opportunities by offering dwellings close to buses and rail transport [see Strategic Sites Topic Paper <u>CD 3.67</u> paragraph 4.41].
- This Town Centre Framework Masterplan SPD is required to reflect these policy requirements and will be a material consideration in the determination of planning applications.

- 8. Turning to the specific part of the question, part 6) of Policy STR/SS2 requires key development sites to identify and deliver the uses it allocates to the area as a whole and requires specific areas to be identified through the Town Centre Framework Masterplan SPD within the allocated site. It is not intended that the SPD should itself allocate uses. Given the transformational growth around Paddock Wood, investment into the town centre as a whole will be supported in line with the parameters of Policy STR/SS2 and other policies in the Plan. The intention is that key zones within the allocations already established through the Policy within the Local Plan will be identified in the Town Centre Framework Masterplan SPD setting out where investment can help transform the town centre, with an indication of the distribution, scale and quantum of proposed uses in line with those identified in the policy, together with key areas of open space, public realm, vehicular access and pedestrian routes. This approach is considered to be justified. When read as a whole, the policies within the Plan coupled with the requirements of Policy STR/SS2 will provide a firm policy basis for the determination of a planning application, the detail of which will be guided by the SPD.
- 9. The Council draws the Inspector's attention to the Draft Town Centre Masterplan which has been prepared by DLA [Appendix 1]. This has been presented to members of the Strategic Sites Working Group (SSWG) and Paddock Wood Town Council and its associated Neighbourhood Development Plan Group as a working draft document. This document will form the basis of future discussions and engagement with key stakeholders and the community as part of the preparation of the Town Centre Framework Masterplan SPD, which is being progressed in line with the timeframes set out in the Council's published LDS [CD 3.143].
- Please also note that one of the key development parcels in question; to the south of Station Road and west of Commercial Road [Site AL/PW 1 in the Tunbridge Wells Local Plan Site Allocations Local Plan 2016 [CD 3.119] benefits from two developments which cover approximately two thirds of the site.
- 11. The first is for the provision of 33 apartments for older people with a 287 sqm retail unit at ground floor level, which was granted on appeal (Ref 18/03262/FULL). A site plan is enclosed at Appendix 2. This scheme is currently being implemented and construction has begun.

12. The second scheme has planning permission for the provision of 14 residential units and flexible commercial/office uses on land to the rear of 7-9 Station Road (LPA Ref. 21/00665/FULL). The applicant, who forms part of the SSWG, worked proactively with the Council on this scheme and responded to the principles of the draft Town Centre Framework. A site plan is enclosed at Appendix 3.

Inspector's Question 2: [re. Town Centre Framework SPD]

Is the Plan justified and effective by requiring development proposals to accord with the (not yet prepared) Masterplan SPD?

TWBC response to Question 2

Introduction

- 13. The Council would draw the Inspector's attention to the published Local Development Scheme [CD 3.143]. This sets out the timeframes for the preparation of the Paddock Wood Town Centre Framework SPD as required by Policy STR/SS2. This anticipates that preparatory work is to be undertaken until Autumn 2022, with a draft document ready for consultation upon adoption of the Plan in early 2023. Adoption of the SPD is anticipated in July 2023.
- 14. Accordingly, following the adoption of the Local Plan, there will be a consultation draft of the SPD which will carry some weight as a material consideration in the determination of planning applications. It is anticipated that development proposals will emerge for discussion as work on the SPD progresses through to finalisation.
- 15. The Council therefore considers the Plan is justified and effective in this respect.

Inspector's Question 3: [re. Development Contributions]

What is the justification for seeking developer contributions in part 8 of the policy? What proposals would be subject to this requirement and what would they be required to contribute towards?

TWBC response to Question 3

Introduction

- 16. Part 8 identifies that developer contributions will be sought from residential schemes in the town centre towards the infrastructure set out in the Strategic Sites Masterplanning and Infrastructure Framework [CD 3.66]. This Infrastructure Framework includes items of infrastructure which would meet the CIL tests and which will include contributions towards active travel routes and the Local Cycling and Walking Infrastructure Plan (LCWIP) [Phase 1 CD 3.115a and Phase 2 CD 3.115b] identified measures, and contributions towards education and health facilities. The anticipated residential yield from the town centre has been considered by the relevant infrastructure stakeholders and so the requirement for town centre applications to contribute accordingly is justified.
- 17. Each planning application which is submitted to the Council is considered on a case-bycase basis, in terms of what planning contributions might be necessary and whether they meet the Regulation 122 CIL tests (as set out in paragraph 57 of the NPPF). It is therefore considered appropriate to make reference to this in Policy STR/SS2.

Appendices

Appendix 1: Draft High Level Masterplans

TUNBRIDGE WELLS

Paddock Wood & east Capel High Level Masterplans

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Purpose and Scope

- 1.1 This document accompanies the Structure Plan (set out in the Strategic Sites Masterplanning and Infrastructure Document prepared by DLA) for Paddock Wood and East Capel and Infrastructure Framework for Paddock Wood, East Capel and Tudeley, which forms part of the evidence base for the emerging Tunbridge Wells Local Plan.
- 1.2 The High Level Masterplans included in this document provide a further level of detail over that in the Structure Plan, for the following allocations relating to draft Policy STRI/SSI:
 - Expansion Areas to the north-west, south-west and east of Paddock Wood
 - Employment Areas to the north and north-east of the town
 - Town Centre development opportunities within
 Paddock Wood
- 1.3 The document sets out the overall masterplanning principles and character for the allocations, before presenting layers for land use, movement, green and blue infrastructure, community facilities and urban design as appropriate. It is anticipated that these may form the basis for future Supplementary Planning Documents (SPD) to guide planning applications. SPDs would provide scope to provide detailed guidance on a wide range of place making matters.
- 1.4 Where necessary, illustrative detail studies demonstrate how masterplanning principles may be applied to key placemaking opportunities within the Structure Plan.
- 1.5 This document should be read in conjunction with the main Strategic Sites Masterplanning and Infrastructure report.





02 NORTH WEST EXPANSION AREA

Overview

- 2.1 The northwestern area is a significant expansion of around 1,400 new homes, and is the first significant residential land use north of the railway line in Paddock Wood. The masterplan has been prepared to reinforce strong active travel connections within the development and into the town centre to ensure that the developments are not isolated and cardependent for daily needs. These active travel connections mesh with proposals for the town centre, described later in this document.
- 2.2 The landscape of the northwestern area is flat and open, and has good visual links with the Medway Valley to the north. It does not have strong existing tree lines, and has existing managed watercourses running between fields. Much of the land is within Flood Zones 2 and 3, and this informs the pattern of development, retaining natural drainage patterns where possible.
- 2.3 As a result the character of place will be strongly related to natural and open landscape corridors, with good visual connections to the surrounding landscape, with a strong 'village centre'-style local centre that provides for daily needs. An illustrative plan for the local centre is included.
- 2.4 This chapter presents annotated layer diagrams based on the Structure Plan to provide a further level of masterplanning detail, based on the overall character of place defined above.

Structure

2.5 The following extracts from the Structure Plan highlight the overall urban structure of the area, which responds to the natural features of the site. Areas suitable for development are connected by routes for all modes of transport, with onward travel to the town centre and surrounding countryside. The development will be housing led, and will be supported by a primary school and a a small local centre intended to meet day-to-day convenience needs. A green infrastructure network will provide generous open space for recreation needs, flood and surface water management, food production, childrens' play and a wetland park to support the creation of ecological habitat.





Figure 1: Structure Plan extract for northwestern masterplanning area

Land Use

2.6 The proposals are in accordance with the requirements of the NPPF in adopting the sequential approach to development within floodzones.



Figure 2: Land Use plan extract for northwestern masterplanning area

- Movement2.7High levels of permeability for pedestrians, cyclists and buses
are proposed to encourage minimal use of private cars. A bus
gate is proposed to limit through traffic and discourage driving
to the town centre. Paddock Wood is a compact town and direct
connections to the town centre and the station would ensure it
can be reached on foot or bicyle in a very short time.
 - 2.8 There is a need to cross the flood plain, and the suggestion is made that roads are constructed over causeways, with culverts to maintain the flowpath of flood and surface water.



Figure 3: Mobility plan extract for northwestern masterplanning area

Green and Blue

2.9

Generous green space results from the pursuit of the sequential test, ensuring easy access for recreation and a green setting for all homes. Green space should be mutli-functional, and include opportunities for extensive wetland habitat.



Figure 4: Green and blue infrastructure plan extract for northwestern masterplanning area

Community Wellbeing

2.10 The provision of local centre services at the heart of the northwestern neighbourhood builds on the principle of the 'walkable neighbourhood'. Alongside a new primary school, and local convenience shop, there is potential for community centre and nursery. This site also offers one of two potential locations for a new GP surgery.





A Local centre detail study (see p14-15)



Figure 5: Community infrastructure plan extract for northwestern masterplanning area

Urban Design Framework

- 2.11 Building on the layers of the Structure Plan, the urban design framework establishes the initial design parameters for effective placemaking, ensuring the new expansion areas are legible, varied, have a sense of place and distinctive character, and integrate well with their surrounding context and landscape setting. They provide an extra level of design detail over the Structure Plan and assist in graphically establishing the key features that proposals coming forward should demonstrate.
- 2.12 The northwestern expansion area is strongly defined by pre-existing Flood Zone 2 and 3 areas, creating the structure of development parcels. It is based around a single main local centre, and extensive internal and external active movement links.
- 2.13 The urban design framework establishes a range of key placemaking principles:
 - Strong street frontages along the main street
 - Landmark buildings creating a distinctive place
 at the local centre
 - Landmark buildings at key internal viewpoints to aid navigational legibility
 - Views towards the south (High Weald hills) and towards the north (Medway Valley) to anchor the new development within its landscape
 - Frontages along the edges of open space to create defined edges
 - Landscape features or nodes where the main street and active travel corridors cross the main north-south open space corridors

A Open views towards Medway Valley







Detail Study: Local Centre

- 2.14 Each new neighbourhood in the expansion areas (north-west, south-west and south-east) is based around a small mixed-use local centre, walkable from all homes. This detail study presents an illustrative configuration for such a local centre.
- 2.15 The illustrative local centre example is based on the northwestern local centre illustrated in the Structure Plan. Due to its location north of the railway and the larger scale of development in this parcel, this local centre has the potential to be marginally larger in scale and facility than others in the southwest and southeast. Nevertheless, the principles demonstrated of people-friendly spaces, integrated active movement, and co-location and concentration of facilities hold for the other local centres.
- 2.16 Concentration of day-to-day services within the local centre ensures day-long activity levels on the streets, and reinforces its vitality and creates a sustainable catchment for services located there. Located at a walkable distance from homes in the neighbourhood, this will reinforce the use of active travel for regular services.
- 2.17 The local centre study demonstrates the principle of integrating the following potential land uses:
 - Primary school
 - Mid-size food store (approx. 1,350m2 gross floorspace)
 - Nursery
 - Care home / elderly accommodation / day care facility (use class C2/C2A)
 - Community space and garden
 - Smaller retail and café units
 - Housing apartments and terraced houses
- 2.18 In addition, the local centre study illustrates the following movement principles:
 - Use of a bus gate along the main street to restrict through vehicle movement to public transport only. ANPR or pneumatic bollards offer means by which through traffic can be prevented.
 - Integration of dedicated cycling and pedestrian routes to encourage active travel
 - Integration of car parking for some uses
- 2.19 The study also demonstrates the integration of existing blue and green infrastructure networks, retaining existing mature trees, use of existing watercourses, and the use of planting and landscaping within streets to provide an attractive environment and manage surface water runoff effectively.





1 Primary School

- 2 Residential Care Home + Day Care Facility (use class C2/C2A)
- 3 Nursery
- 4 Community Facility
- 5 Food Store (approx 1350m2)
- 6 Ground Floor Retail with Apartments above
- 7 Apartments / Flats
- 8 Terraced Houses
- 9 Semi-Detached Houses

- 10 Bus stop
- 1 Bus Gate
- 12 Bus Only Section of Carriageway
- 13 Parking for Care Home
- Square Parking (shared for food store and other facilities)
 one for each eastern and western vehicle accesses
- 15 On-Street Parking
- 16 Pedestrian Footbridge
- 17 Retained Mature Trees as Focal Points
- 18 Teardrop Lakes and Weirs
- (1) Existing 're-wilded' watercourse with leisure routes

Figure 7: Local centre design principles and detail study

03 SOUTH WEST EXPANSION AREA

Overview

- 3.1 The southwestern expansion area is the smallest of the three major residential expansion areas, and the most constrained physically. It is also one of the best connected to the existing town, but the edges of development will need to be handled with care to ensure it does not contribute to perceived coalescence with surrounding hamlets.
- 3.2 The landscape character of the southwestern area is dominated by natural and open spaces with water running through. It is continuous with that of the northwestern area, but differs in that it has strong existing tree lines, and has visual interconnectivity with the High Weald to the south. As a result, it has a more enclosed, treed feel, with development sitting within this framework. Active travel connections through the landscape towards the town centre are prominent.
- 3.3 This area is of a more limited scale than the northwestern and southeastern expansion areas, and has a local centre more limited in size.
- 3.4 The southwestern area hosts the comprehensive sports hub facility, which should be designed to integrate into the surrounding landscape and open space corridors. A detail studyof an illustrative configuration is presented.
- 3.5 This chapter presents annotated layer diagrams based on the Structure Plan to provide a further level of masterplanning detail, based on the overall character of place defined above.

Structure

3.6 The Structure Plan extract highlights the limited development capacity of this area, and the predominance of open green space, which offers real potential to develop a garden village character.



Land Use

3.6 Development parcels are located outside flood zones, in accordance with the sequential test. Detailed design work and flood analysis will be required to determine the final limits of each development parcel.



Figure 9: Land Use plan extract for southwestern masterplanning area

- Movement3.7Mobility proposals are consistent with those for the north-
western area in that they incorporate a bus gate as a key
means of controlling though traffic. Again, the floodplain is
crossed by a causeway.
 - 3.8 Strong cycle and pedestrian connections with the adjacent residential area should be provided. New pedestrian and cycle crossing of the railway in the north-east corner of the site will be required.



Figure 10: Mobility plan extract for southwestern masterplanning area

Green and Blue

3.9

Extensive open greenspace offers a unique opportunity for high levels of resdiential amenity. The detailed design of flood and surface water management arrangements, including a new raised landform in the north-eastern corner of the site, should ensure a habitat rich, engaging and attractive environment.



Figure 11: Green and blue infrastructure plan extract for southwestern masterplanning area

Community Wellbeing



3.10 This area will accommodate a new sports hub to meet the formal open space requirements of the urban expansion sites, in accordance with the Council's Recreation Open Space SPD. Sports pitches could cater for a broad number of sporting activities, whilst an indoor facility could provide changing and meeting space, a gym, indoor sports courts and potentially a new swimming pool. Furthermore, the site offers a potential location for a new GP surgery; the combined facility could be used to promote general health and wellbeing, preventative healthcare, physiotherapy and other treatments. A small local centre will provide scope for a small convenience shop and community meeting place.

Potential Area for Strategic Growth

Pleasable Investo Carrille locations

Internet of Parylina Fields Local Celtitin Sourts Hult

A Sports Hub detail study (see p24-25)



Figure 12: Community infrastructure plan extract for southwestern masterplanning area

Urban Design Framework

- 3.11 An urban design framework establishes the initial design parameters for effective placemaking, ensuring the new expansion areas are legible, varied, have a sense of place and distinctive character, and integrate well with their surrounding context and landscape setting. They provide an extra level of design detail over the Structure Plan and assist in graphically establishing the key moves that proposals coming forward should adhere to. Further guidance will be provided in the form of SPDs, to inform the preparation of planning applications.
- 3.12 The southwestern development area is highly constrained by pre-existing Flood Zone 2 and 3 areas, and development parcels are defined strongly by this.
- 3.13 The urban design framework defines several key placemaking features:
 - Orientation of main north-south streets and spaces that allow views southwards towards the High Weald
 - Strong street frontages and landmark buildings
 defining these north-south streets
 - A key node where the main street crosses the landscape corridor, to create a distinctive place within the landscape
 - An eastern edge that backs directly onto existing gardens, to form a continuous extension of the existing town
 - Use of planting and buffers to distance development from Badsell Road and the setting of the listed buildings in the south west
 - A strong planted edge on the west to define a new edge to the Green Belt











Figure 13: Urban Design Framework plan for southwestern masterplanning area

Detail Study: Sports Hub

- 3.12 The proposed Sports Hub in the Structure Plan integrates all of the sports pitch requirements for the expansion areas (North West, South West and South East) in a single location. This coordinated approach provides the opportunity to create a centre with a concentration of facilities, with the potential to have a better overall sports and leisure offer for Paddock Wood.
- 3.13 This detail study demonstrates a potential layout, integrating a wide variety of pitches and facilities on the 10ha of land earmarked for the centre.

Sports Centre with 25m Pool 2 Pavilion / Changing facilities (4 teams) 3 Maintenance facility 4 Football ð 0 U9 / U10 pitches 2no • Ull / Ul2 pitches 2no. • U13 / U14 pitch lno. Senior pitches 2no. 5 Rugby Senior pitch lno. Cricket Senior pitch lno. Netball / Tennis Outdoor courts 6no. Artifical Grass Multi-sport Pitch (hockey and recreational football)

lno.

MUGA facility

Design Principles

Northern Parcel

Grouping the 'built' facilities and elements and those with flood lighting together, on the northern side of the new access road will enable efficiencies in construction and services / utlities and also help to reduce their visual prominence.

The MUGA and outdoor sports courts along with parking are located to the western edge where they can be screened to a degree from the Green Belt by the existing tree belt, road embankments and adjacent rail line.

The grass pitches are located to the east where their open, grassed appearance will sit more comfortably with the adjacent linear park.

The Sports Centre building is located next to the access road for ease of access and improved legibility. It also sits more centrally between the northern and southern elements of the Sports Hub.

Southern Parcel

The grass sports pitches and associated changing facilities are grouped together and located to the south of the new access road. The less-intrusive nature of construction, lack of flood lighting and open grassed character will sit comfortably adjacent to the new linear park as well as retain a strong sense of 'openess' adjacent to the Green Belt in this more visually exposed part of the site. The changing facilities are located centrally in order to provide a more balanced service. The building could also function as a pavilion facilitity for the cricket pitch.

Access and Movement

Safe and convenient access is provided to and from the Sports Hub facilities with direct links to the walking and cycle path network to encourage active travel as well as centrallylocated bus stops and parking including bays with permeable surfacing. Recreational paths provide an extra layer of permeability to serve the nearby community. Vehicular access to the Pavilion / Changing Facilities are indicated as being directly off of the A228. Should this not be desirable, access could be provided directly from the New Link Road running south.

Integrating with the Wider Open Space

In addition to the formal sports pitches and facilities, there is the opportunity to provide informal 'trim trail' exercise stations alongside a recreational path network. This would encourage more people to access and use the open space helping to further integrate the Sports Hub into the open space network and wider community.



Figure 14: Sports hub design principles and detail study

Detail Study: Landscape Character

- 3.14 The design of open space between residential development will play an essential role in defining sense of place and character of the expansion areas. As outlined in the Structure Plan, this varies considerably between eastern and western expansion areas, reflecting their very different landscapes and masterplanning conditions.
- 3.15 This detail study presents a transect through an open space corridor, to demonstrate potential landscape and open space typologies suitable for this site.
- 3.16 The landscape character detail study presented here is also broadly applicable to the northwestern expansion area, due to their continuous connection north-south. In line with the north-western site's greater capacity to hold floodwaters, and more open landscape character towards the north, detailed landscape treatments will vary, but the principles of a natural and open landscape remain.
- 3.17 Open space on the western side of Paddock Wood and in east Capel is mostly natural in form, integrating water management throughout, and breaking up development into smaller parcels and creating expansive active travel movement networks. As such landscape design should be strongly influenced by existing vegetation and watercourses, with well-integrated active movement networks.



Tree planting for visu and environmental k Storm water attenuation
Design Principles

Accessible

A network of connected walking and cycling trails and paths will extend through the landscape to provide a variety of opportunities for travel, recreation, play and exercise.

Visual Connectivity

Visual connectivity across the landscape will enable views and sightlines between 'landscape types', increasing the sense of openness and scale of the linear park.

Wildlife-rich

The variety within the western landscape will create a mosaic of habitat types to suit a wide variety of flora and fauna as well as provide for amenity and recreation for residents and visitors.

Variety

The scale and character of the western landscape will provide a variety of opportunities for travel, recreation, play and exercise.



Figure 15: Western landscape character design principles and detail study

04 EASTERN EXPANSION AREA

Overview

- 4.1 The eastern expansion area is of a similar scale of development to the northwestern expansion area, but is on the southern side of the railway line and better connected through existing streets to the town centre and urban fabric. It will also deliver bus, cycle and pedestrian connections to recently permitted growth areas such as the Church Farm scheme by Countryside.
- 4.2 The landscape character of the eastern expansion area is more agricultural, with good visual relationships to the existing town and surrounding farmland. The land is less dominated by water, and as a result less physically constrained.
- 4.3 This area will be more closely connected to the existing urban fabric, and as a result the character of development will feature more formal and linear open space, with views to surrounding farmland and landmarks such as oast houses and the existing area of Paddock Wood. This character will be reflected in a local centre based around a formal green open space, with links along the former Hop Pickers railway line to the town centre and surrounding countryside.
- 4.4 This chapter presents annotated layer diagrams based on the Structure Plan to provide a further level of masterplanning detail, based on the overall character of place defined above.

Structure

4.5 The eastern expansion area should be a well connected neighbour of Paddock Wood, with the design of the site referencing the built settlement along the western flank and the open countryside to the south and east. Existing watercourses, tree planting, a north-south spine route for buses, and heritage assets such as the former Hop Pickers railway line shape the plan.





Figure 16: Structure Plan extract for eastern masterplanning area

Land Use

4.6 Figure 17 demonstrates the limited influence of surface and flood water on the Structure Plan. Development is focused along the spine route, with peripheral properties benefiting from a view across greenspace.



Figure 17: Land Use plan extract for eastern masterplanning area

Movement

4.7 North-south connectivity through the site is important for all modes of travel, but cars will be prevented from travelling through the adjacent development at Church Farm by a bus gate. Walking and cycling routes should afford priority to pedestrians and cyclists.



Figure 18: Mobility plan extract for the heastern masterplanning area

Green and Blue

4.8

The green and blue infrastructure framework follows the northsouth alignment of the site and acts as a key structural element. Greenspace should be informal, offering high levels of residential amenity and ecological habitat. Substantial planting belts along the eastern edge and in the south of the site should help to filter views and broker a transitional relationship with the open countryside beyond.



Figure 19: Green and blue infrastructure plan extract for heastern masterplanning area

Community Wellbeing

4.9 A new primary school and local centre, with scope for a convenience store and commuity meeting place should be located within the north of the site to complement a new, consented primary school which is being developed near the southern end of the site. Mascalls Secondary School is within easy walking and cycling distance.

Potential Area for Strategic Gro

cosmilal Involto Careli e locations

Prevery / Second associated Playing Local Celline Source Hub



Figure 20: Community infrastructure plan extract for heastern masterplanning area

Urban Design Framework

- 4.10 An urban design framework establishes the initial design parameters for effective placemaking, ensuring the new expansion areas are legible, varied, have a sense of place and distinctive character, and integrate well with their surrounding context and landscape setting. They provide an extra level of design detail over the Structure Plan and assist in establishing the key requirements that proposals coming forward should adhere to.
- 4.11 The eastern expansion area is less constrained physically, and in line with Structure Plan design principles, is more closely integrated into the existing town's urban fabric.
- 4.12 The urban design framework establishes the following key placemaking principles:
 - Landmark buildings fronting onto a green space forming the heart of the local centre
 - Re-use of the Hop Pickers' line as an active travel link to the town centre and countryside
 - Views from main streets and the local centre towards the south (High Weald hills), and the eastern agricultural landscape, to anchor the development within its surrounding landscape
 - · Strong street frontages along the main northsouth street
 - A planted eastern edge retaining the rural nature of Queen Street









But Routé / Main Street



Pedestrian / Cycle Movement Landmark Buildings improved Pedestrian Crossing Landscape Feature Strong Landscape Edge



Figure 21: Urban Design Framework plan for eastern masterplanning area

Detail Study: Landscape Character

- 4.13 The design of open space between residential development will play an essential role in defining sense of place and character of the expansion areas. As outlined in the Structure Plan, this varies considerably between eastern and western expansion areas, reflecting their very different landscapes and masterplanning conditions.
- 4.14 This detail study presents a transects through an open space corridor, to demonstrate potential landscape and open space typologies suitable for this expansion area.
- 4.15 The eastern expansion areas are less physically constrained for development, and as a result open space is less expansive and takes on a parkland character, with integrated uses such as allotments, play areas and orchards. The eastern site will be more continuously linked into the urban fabric of the existing town.



Informal mown trails through _ grass and wildflower meadow

> Variety of paths through the linear p connecting to the adjacent areas o

Design Principles

Accessible

A network of connected walking and cycling trails and paths will extend along and through the landscape connecting to the adjacent neighbourhoods

Landscape Rooms

A varied landscape, comprised of a series of distinct areas which provide for a wide diversity of peoples day-to-day travel, recreation, social interaction, exercise and play needs

Informed by heritage

The linear parks will reference the productive landscape of the past through the retention of some existing and creation of new community orchards and allotment gardens, positively integrated into the open space network

Resilient

The open spaces will incorporate measures for a resilient future including SuDS and stormwater attenuation, a varied and suitable plant species palette and a considered approach to future management which can help reduce maintenance requirements



Figure 22: Eastern landscape character design principles and detail study

05 NORTHERN AND NORTH-EASTERN EMPLOYMENT AREAS

Overview

- 5.1 This chapter provides further detail on the expansion of the existing employment areas to the north and north-east of Paddock Wood.
- 5.2 The masterplanning and land use considerations contained in this section have directly informed the development of the overall Structure Plan.
- 5.3 Given the ever-changing nature of the employment market and its uncertain requirements for building typologies, flexibility is ensured through regularly-shaped, divisible development plots and a simple framework for movement, landscape and design.
- 5.4 It is anticipated that the employment expansion areas are likely to host lower-density, large floorplate industrial and distribution units, in line with existing employment areas in the town and the prevailing employment types as outlined in an economic report prepared by SQW, detailed in an Appendix to the Strategic Sites Masterplanning and Infrastructure Study.





Figure 23: Structure Plan extract for northern employment masterplanning area

Land Use

Site Boundary

Employment

SUDS

STW Extension

Potential Residential

Potential SUDS Expansion

Retained Landscape Open Green Space

- 5.5 Development parcels (pink) are regular shapes and suitable for subdivision.
- 5.6 Potential locations for drainage attenuation ponds as part of a SuDS scheme are located at the northern boundaries of the northern and north-eastern parcels, using the natural topography of the site to retain water within boundaries .

5.7 Land at the far south-eastern corner of the north-eastern parcel is earmarked as potentially being required for an extension to Paddock Wood's sewage works, as discussed in the main Structure Plan and Infrastructure Framework report. Should Southern Water confirm this land is not required, it could accommodate further employment uses.



Figure 24: Land Use plan for employment allocations

Movement

Potential Area for Strategic Growth

Active travel. Technicky/cycle rocker Improved Podorman Croning

Public transport:

On Sty SLALing

OP-544 Bin Loop. See antes

Secondard improvements

ternid shadk and object asterny

of Interior

Continuery

- 5.8 Access to the sites is provided from the Maidstone Road and Transfesa Road, with a potential through connection from the north-eastern parcel to the Maidstone Road. Provision of this through connection would be subject to impact on existing trees and highway considerations, but is the preferred approach.
- 5.9 Each development plot has access to the primary access street running through the sites, to ensure efficient servicing and vehicular access.
- 5.10 Active travel links with the town centre and residential expansion areas are continued through the sites, and improvements to the pedestrian bridge over the railway line into the town centre is included in the Infrastructure Framework. These routes are intended to complement similar measures within the residential sites to ensure easy walking and cycling between home and work. Routes should be well-lit, safe and convenient.



Figure 25: Mobility plan extract for northern employment masterplanning area

Urban Design Framework

- 5.11 The urban design framework for the employment sites sets out basic parameters for more detailed masterplanning of the sites. They set out the following key design principles:
 - Gateway features at the primary vehicular entrances
 to each site
 - Frontages onto the main streets and movement corridors
 - Use of planting and landscaping to create legible nodes where main streets cross green active travel corridors and existing mature hedgerows
 - Use of planting to provide visual screening of some larger units . This includes the retention of mature tree planting along Maidstone Road and Lucks Lane.





Figure 26: Urban Design Framework plan for northern employment masterplanning area

06 TOWN CENTRE

Overview

- 6.1 This chapter presents a study of Paddock Wood's town centre in the context of the significant anticipated expansion of the town over the Local Plan period. It includes a masterplanning framework to maximise the opportunities for regeneration and development in the town centre that an increase in population presents.
- 6.2 The policy context and baseline situation for the town centre allocation is set out in the full Structure Plan and Infrastructure Framework report.

Background

- 6.3 The growth of Paddock Wood over the Local Plan period to 2038 have significant implications, changing the scale of the town, and this has particular implications for the town centre. The draft allocation suggests that the population of the town is likely to double from present levels, with a significant increase in the provision of employment land as well.
- 6.4 Such levels of growth demand a holistic understanding of what this might mean for the function, form and opportunities for the town centre. If planned for, growth could underpin viable new services and an increase in activity and vitality within the town centre.
- 6.5 This study is taking place during the period of the COVID-19 pandemic, which has had significant effects on lifestyles and places across the UK. Its long-term implications are not yet known, but it is clear that changes in working patterns and lifestyle could have potentially positive effects on town centres such as Paddock Wood, if planned for proactively.
- 6.6 The masterplanning work that has formed the Structure Plan aims to provide good pedestrian and cycling connections to Paddock Wood town centre, and to ensure that new neighbourhoods are positively connected to the town centre without creating alternative centres within the town (beyond those intented to serve the immediate neighbourhood). This approach aims to strengthen the core and provide critical mass for new services. The compact nature of the town supports an active travel-led movement strategy to bring people into the town centre.
- 6.7 This study takes in the defined town centre, but also looks more widely at other potential longterm opportunities. These include redevelopment of some land north of the railway line, such as that currently occupied by BarthHaas.

- 6.8 At present, Paddock Wood's urban area, nearly all residential land and town centre is concentrated to the south of the main railway line (eastwest). Dedicated employment land is located entirely to the north of the railway. Under the growth scenario outlined in the Structure Plan, this would change, with a significant number of homes located to the north of the railway.
- 6.9 Historically, employment land has been located adjacent to the railway due to industrial need for access to the railway for movement of products (in particular hops). This need for adjacency is no longer present, and the sidings at Paddock Wood are used exclusively as a Network Rail maintenance depot. With planned growth, large format employment uses have the opportunity to move northwards, towards the strategic



Figure 27: Paddock Wood land use before (left) and after (right) expansion in line with Structure Plan Option 1

road network, and away from the town centre. This could provide betterment for those businesses (such as Barth Haas) with improved buildings, and a more appropriate use of land adjacent to the railway station and town centre, in this case, residential. This presents an opportunity to better connect land north and south of the station, to 'straddle' the tracks, forming a bridging link to the draft growth allocation to the northwest of the town.

Town Centre
Employment
Homes
Primary road
Rail line
Paddock Wood rail station
Pedestrian / cycle access
Bus route

- 6.10 There is only one route from the north into the town centre; the Maidstone Road bridge over the railway line. This has restricted pedestrian and cycling space. Addressing this movement issue will be an essential part of a town centre strategy.
- 6.11 Growth to the west of the town has the potential to provide fluvial flood betterment to the town centre. This intervention offers the possibility of increased residential development in the town centre, supporting viability and activity, as well as maximising sustainable transport opportunities by offering dwellings close to buses and rail transport.

Figure 28: Expansion of employment land away from town centre

Economic Analysis

6.12 This town centre masterplanning study has been informed by a report from SQW on the economic opportunities for Paddock Wood presented by planned growth over the Local Plan period. The town centre is considered a critical location for building on the opportunities for growth, with its central and well-connected location in relation to the expanding population.

6.13 The report found that

- The wider population base is relatively highly skilled, and Tunbridge Wells has particular strengths in sectors of the knowledge economy, but the skills-base of the resident population is significantly lower qualified overall than compared with nearby Tunbridge Wells.
- As of 2011, approximately 30% of residents live and work in Paddock Wood; the rest commute to Tunbridge Wells, Tonbridge and Malling and Maidstone; a further 10% commute to London.
- Paddock Wood's town centre 'offer' is relatively functional and responds to the day-to-day needs of the town's residents along with those of its rural hinterlands.
- Paddock Wood's office market is limited in scale and offer

- The sectoral and locational economic impacts of Covid-19 across the Kent economy have been varied, but are nonetheless significant.
- The emerging policy context for Paddock Wood clearly promotes a comprehensive, masterplanned approach to the regeneration, revitalising and diversification of the town centre, and encourages a mix of uses in the town centre
- Increasing demand is emerging and anticipated to grow for flexible workspaces in locations previously considered as either suburban or satellite residential locations to support blended ways of more localised working closer to employees' homes.
- The increasing shift towards more localised working – typically in higher-value knowledge and service economy related sectors – could both demand and catalyse the further diversification and offer of local town centres.

- 6.14 In regard to interventions within the town centre, key findings from the report included:
 - A flexible workspace 'hub' of c.150-200sq m in the centre of Paddock Wood should form a central part of the proposed masterplan for Paddock Wood town centre (as per PSLP Policy STR/SS2).
 - Site Allocation wording for Baarth Haas site to acknowledge potential economic/employment implications of site release (i.e. promote mix of uses)
- 6.15 The full report can be read in an attached Appendix to the main Strategic Sites Masterplanning and Infrastructure Study.



Figure 29: Existing town centre movement infrastructure

Baseline Urban Design Analysis

- 6.17 Paddock Wood's town centre is bounded to the north by the railway line and station. To the east it is bounded by the B2160 Maidstone Road. Within the town centre Commercial Road is the main shopping street and heart of activity. Bus stops are located near the railway station and at the southern end of Commercial Road. Bus stops to the north of the station are some distance away. Opportunities for easy interchange are not evident.
- 6.18 There are significant barriers to movement from the north and the west. The railway line prevents all movement except along the B2160, and the embankment for the railway bridge constrains movement from residential areas to the west.
- 6.19 The railway bridge on the B2160 is the single town centre crossing from the north, and carries buses, cars, HGVs and pedestrian traffic. Pavement widths are extremely narrow. The bridge over the tracks within the railway station is behind the station ticket line and is not a public right of way.



Figure 30: Barriers to movement and existing pedestrian and cycling accessibility

- 6.20 Pedestrian and cycling access into the centre is surprisingly limited. Many routes are through alleyways behind back gardens, which may be perceived as unsafe, particularly after dark. Routes from the east are concentrated along Church Road, which arrives in the centre outside the Waitrose service yard. There is poor permeability from the B2160 across to Commercial Road from the west.
- 6.21 At the northern end of Commercial Road, near the station, the public realm is compromised by the service yard of Waitrose, which faces this natural point of activity and focus.
- 6.22 Commercial Road has a mix of high quality frontages interspersed with more recent development of varying scale, design and quality.

Opportunities

- 6.23 At the northern end of Commercial Road, a natural point of focus and activity is present but is currently underutilised with poor public realm and few facilities. This could be the focus of a high quality civic space, which the town currently lacks.
- 6.24 There is a smaller opportunity north of the station to create improved public realm and enhance the arrival and departure experience for passengers heading north by other modes.
- 6.25 Opportunities for improvements to accessibility are also present. Northsouth connections across the railway could be enhanced with a new pedestrian and cyclist bridge adjacent to the existing bridge, as well as a 'street' bridge at the railway station to provide north-south connectivity without needing a rail ticket.
- 6.26 Improved connections into Commercial Road from the west and east are also possible, utilising existing vacant or undeveloped land.

- 6.27 Away from the movement network, there are several opportunity sites to accommodate new uses and development that would be made viable by planned growth. These are primarily concentrated at the northern end of Commercial Road or in the railway station environs. Land ownership in these areas is more consolidated, aiding potential redevelopment and intensification.
- 6.28 Finally, although only the Barth Haas site is being promoted during this Local Plan period, by providing improved connections across the railway, there is a long-term opportunity to redevelop more employment land north of the railway line more intensively to create higher-density neighbourhoods, focused around the railway station. This possibility should be futureproofed for, with the proviso that there should be no net loss of employment land within the town.

Illustrative Masterplan

- 6.29 To support the growth of Paddock Wood, and build upon its opportunities, the illustrative spatial masterplan outlines:
 - Key interventions
 - Access and movement considerations
 - Character areas with precedents
 - Potential for land use clusters
- 6.30 Several key interventions are proposed:
 - A civic space at the northern end of Commercial Road, adjacent to the station, as a focus for community activities
 - Improvements to connectivity and permeability to improve access to the centre
 - A new residential quarter to the north of the railway, connected by a new overbridge from the civic space to the south
 - Development on the land adjacent to the station, made possible by the consolidation of car parking into multi-storey car parks
 - A car park to the north to reduce vehicle traffic through the town centre, and a car park to the south with access away from the new civic space
 - Core retail, employment and entertainment uses remain concentrated along Commercial Road to strengthen it as a focus of activity

- A secondary mixed-use area is located west of Commercial Road to expand the town centre's service offering
- The potential to restrict HGV movements on the B2160 bridge, or reduce it to a 'shuttle' traffic light arrangement (with a single lane carriageway across) with space reallocated to pedestrian and cycling movement
- 6.31 The masterplan builds on the following principles:
 - Concentrating activity in the centre through provision of high quality public realm
 - A permeable walking and cycling network, with continuing vehicle access and parking but with reduced impact on pedestrians and Commercial Road
 - Improve bus access to the railway station
 - Reflecting Paddock Wood's heritage as a railway town with terraces and compact development adjacent to the station
 - Space for emerging uses such as an employment hub, flexible commercial and leisure units and residential development



1 New pe	
12 Busines	
13 Comm	
Apartm	
15 Small o	
16 Apartm	
D Potentio	
18 Church	
19 Bus / To	
Figure 31: Illustrative Masterplan for Paddock Wood town centre	

- New pedestrian route to access town centre from north
- Business Hub Co-Working Space
- 3 Community Facility
- Apartments over small retail units
- 5 Small office units near railway station
- Apartment block with podium car parking
- D Potential future terraced housing
- B Churchill Retirement Living Scheme
- 9 Bus / Taxi / Rail Interchange





→ Pedestrian & cycles

P At-grade car park

Ρ

Multi storey car park

Figure 32: Movement of different modes in Paddock Wood town centre





Active travel spine

Quiet green lane



Industrial-style townhouse / apartments



Figure 33: Residential character areas and precedents

Fine-grain in-fill mixed use development







Cladding treatments to car park structures

Upgraded station & setting







Figure 34: Commercial and mixed use character areas and precedents

Indicative Capacity

- Sites West of Commercial Road: 30 residential units as a mix of houses and apartments, plus ground floor flexible retail or commercial units
- Land south of railway line: business hub employment use
- DPC14 (BarthHaas site): up to 140 apartment residential units



Figure 35: Land use 'clusters' in Paddock Wood town centre

Implementation

- 6.32 Tunbridge Well Borough Council will have a key role in driving the preparation and delivery of a Strategic Framework.
- 6.33 Paddock Wood Town Council (PWTC) is in the process of preparing a Neighbourhood Plan, which will address issues of growth and the implications for the town centre. This study could offer a starting point and evidence for the preparation of that plan. Detailed design guidance, such as shop frontages, block typologies and other considerations, are also best handled at a local community level within the Neighbourhood Plan.
- 6.34 The development of the framework is intended to set out the aspirations for the growth of the town centre during the Local Plan period and to establish the policy parameters within which this growth will be managed.
- 6.35 Historically, such significant growth in local demand may have been met through the development of a new purpose built Shopping Centre. This would typically be anchored by a food store or a large national multiple trader and would be deigned to meet the needs of the multiple retailers. With the changes in shopping habits

and the way that the more recent working age generation views and uses town centres, such an approach is now anachronistic. They are more likely to appreciate a local farmers market or food hub than another big supermarket, and a range of independent shops offering more artisan products over standard national retailer fare. They will want society, entertainment, services and places to work, whether formal or informal, within an attractive, clean healthy and appealing setting.

- 6.36 Key to long term delivery of such a vision will be the identification of a range of short, medium and longer term projects, rather than a big intervention such as the historic Shopping Centre approach.
- 6.37 The implementation of each project will depend on its specific circumstances, such as ownership, proposed or suitable mix of uses, relationship with the wider movement and accessibility strategy for the town, and the specific stakeholders involved. The role of the Local Authority and the Development Framework is to curate this growth so that it is specific to Paddock Wood and reflects the real demands of the growing population.



Artist's impression of town centre redevelopment opportunities



Delivery Process

6.38 The delivery process will vary from project to project dependent on the stage of preparation.

Visioning

6.39 For projects at the concept stage, visioning and development will be needed, possibly including option appraisal and consultation showing how these fit in with the development framework, and contribute positively to the evolution of the town centre e.g. proposals to better integrate and enhance the Station approach.

Design & Planning

6.40 The next step is more detailed design. At this stage, more detailed costings can be carried out and delivery options refined, enabling specific planning applications to come forward. Experimental schemes may require more information or testing prior to full design e.g. implementing changes to the Maidstone Road bridge, if HGV crossing is prohibited, or developing more public use of the footbridge link at the station.

Assessing the need for Funding

6.41 The costs and values identified and the certainty of deliverability derived from the planning process will enable, if required, a funding strategy to be developed. This will identify existing sources of finance and the need for specific funding applications to be made to address any gaps.

Procurement & Delivery

6.42 It is anticipated that procurement and delivery will be a mixed economy of pure private sector development, public and private sector partnerships, and for some of the public realm projects, wholly public sector led and delivered.

Potential Funding Sources

- 6.43 Public Sector A level of investment will be needed to ensure the implementation of the public realm improvements to the Town Centre. Such investment can be used as the basis for match funding bids to agencies such as the Local Economic Partnership (LEP).
- 6.44 A funding and bidding strategy will need to be developed potentially using opportunities presented in the government's post COVID initiatives aimed at supporting town centres and economic rebuilding.
- 6.45 Private Sector Investment The prospects of wider growth and the presence of a clear town centre framework for development will increase private sector confidence and to help create an environment for investment. An open dialogue with developers will help to ensure high quality development will be achieved.
- 6.46 Developer Contributions (S106 Agreements) – To ensure that development in Paddock Wood makes its full contribution to mitigating its impact on the environment and on the plans for improved public realm infrastructure; the Borough Council will seek to enter into legal agreements with private developers under Section 106 of the Town and Country Planning Act 1990. This could include agreements for contributions to projects within the masterplan such as:
 - The improvement to public realm and development of place in the Town Centre.
 - Amending traffic circulation and improving facilities for pedestrians and cyclists and car parking.
 - Infrastructure requirements.

Viability

- 6.47 Securing development and appropriate level of contribution to place making and infrastructure will be predicated on the financial viability of the schemes as they come forward. A number of sites with immediate development potential have been identified in and around the town centre that may be able to support early interventions and establish the tone and context for change. However the majority of development proposals are likely to come forward in the medium to longer term.
- 6.48 The NPPF requires allocations within the Local Plan to have been proven to be broadly viable at the plan making stage through the testing of a range of development typologies. The viability process assumes that policy compliant development proposals will be able to generate a value in excess of the Existing Use Value of the site to provide the context in which a land transaction will take place, and development will be delivered. The viability work undertaken for the local plan to date broadly indicates that there is a strong prospect of viable residential development coming forward.
- 6.49 For mixed use commercial, employment, service, social and residential development, together with the range of public realm and infrastructure improvements required for the town centre to grow sustainably, viability will only be able to be determined as suitable development proposals come forward. Such proposals will come forward over time so the market in which individual elements are promoted will reflect the wider population growth that has then taken place. They do not and cannot therefore relate to viability based on current levels of cost and value, or current existing use land values. For example, the employment areas to the north of the railway line will become more obsolete over time and may well be relocated as wider employment sites become available. Their current Existing Use Value will not be the same at the point they come forward, and the current value of appropriate alternative uses similarly will change as the demand profile changes. There will be a tipping point where the demand for more town centre related uses, including elements of residential development, justify a change of use. This, however, cannot be demonstrated in advance of the demand coming forward to support those alternative uses.

- 6.50 The commercial circumstances and financial viability profile of a 15,000 immediate catchment population, compared to an 8,000 population, and a 23,000 population compared to a 15,000 population would render such viability testing of the town centre development framework as a meaningless snap shot in time, and may hinder the Council's ability to establish and safeguard spaces and routes necessary for sustainable town centre growth that will inevitably be needed to meet the growing local demand.
- 6.51 To guess at the impact of future changes in demand, cost and value would be unwise and unprovable and would therefore do nothing to indicate long term viability. A standard viability test for the town centre development framework could at this stage limit the ability for the town to meet the long term needs of its growing population, and to accommodate a sustainable mix of uses and activities in future.

Timescales

- 6.52 Timescales related to the delivery of any development process are uncertain. In many cases they are reliant on third party involvement and commitment, and a complex range of activities such as relocations and the unravelling of existing lease structures that involve varying lead in times.
- 6.53 For the Paddock Wood town centre development framework, we therefore advocate identifying short term (0-5 years) known development opportunities, medium term (5-10 years) site areas with clear prospects for accommodating the types of uses likely to be associated with sustainable town centre growth, and broader areas where longer term (10 + years) growth will be supported in the future. The longer term would include, for example, include the areas to the north of the station and railway line, and that can support improved linkages with the surrounding planned residential growth. The longer term the opportunity, the wider the types and mix of uses that might be appropriate, so long as they contribute to the overall vitality, viability and sustainability of the town centre as a whole, and do not prejudice development or the provision of infrastructure that would also be similarly beneficial.



Appendix 2a/2b: Site Plans Ref. 18/03262/FUL



Paddock Wood, Kent, TN12 6EL





Appendix 3: Site Plan Ref. 21/00665/FUL



