

LYNSTED with KINGSDOWN PARISH COUNCIL

8 June 2021

Application No: 21/502609/OUT

Proposal: Outline application for the erection of up to 10no. residential dwellings with associated landscaping, road layout and parking. (Access being sought).



Address: Land To The East Of Lynsted Lane, Lynsted, Kent ME9 9QN

Commenter Name: Lynsted with Kingsdown Parish Council

Commenter Type: Parish Council (Statutory Consultee)

Stance: Objection to the Planning Application

Dear Sirs

At an Extra Ordinary meeting of Lynsted with Kingsdown Parish Council on Tuesday 1st June 2021, it was resolved to object strongly to this proposal.

As the proposal currently stands, this is an application from ECE Planning for approval of access associated with a plot for up to ten homes. But the applicants have made clear this is only the northern section of a larger plot they are promoting, in response to Swale Borough Council's Local Plan Review, for 40-50 homes in total stretching southwards along the margin of Lynsted Lane from New House Farmhouse at the corner of Lynsted Lane/A2 to Fir Tree Cottage (355 metres South of the A2). The below map refers and the application must therefore be determined in this context.

The site is not included in the current Local Plan (Bearing Fruits) nor is it part of the Regulation 19 Draft Local Plan. For that reason alone, the proposal should be rejected on grounds of prematurity. The developers cannot argue that the Draft Local Plan has not delivered until it has failed. It is therefore not appropriate to bring forward significant proposals when the formal Local Plan is still under review.

Our specific objections are itemised below.

1. Highways: The KCC Highways judgement on planning application 19/505036/OUT for the site immediately opposite this proposal is equally applicable here. KCC concluded:

"I would still recommend that the application be refused on the following highway grounds:

- 1. Lynsted Lane by reason of its restricted width, poor alignment and sub-standard junction with London Road is considered unsuitable to serve as a means of access to the proposed development.*
- 2. The existing road network in the vicinity of the site has insufficient capacity to accommodate the material increase in traffic likely to be generated by the proposed development.*

3. The proposed development will increase traffic on a highway lacking adequate footways with consequent additional hazards to all users of the road."

The developers' traffic 'survey' is wholly inadequate, relying on monitoring for parked cars on just two days during Covid lockdown - Tuesday 23rd February and Sunday, 28th February.

The pattern of obstructions on Lynsted Lane varies throughout each day. At best, the A2 end of Lynsted Lane has poor lines of sight, made worse by being effectively single-file most of the time. The entrance to the development, set just 65 metres south of the A2, will add further levels of complexity and danger to road-users and pedestrians alike. Having an entry-point so close to an already complex and congested junction with the A2 is dangerous. With the lack of car parking in Teynham/Lynsted, many residents park throughout the day for visits to the Co-operative Stores, Post Office, Pharmacy, Doctor, Dentist, Veterinary Practice etc. In addition to parking on the road at the bottom of Lynsted Lane, residents and visitors also park in, and/or use as a turning point, the car park of The George Public House. That pub is up for sale and any new owner may not tolerate this practice, thereby exacerbating the problem. The image below is a typical representation of traffic on Lynsted Lane near to the proposed access road into the new development.

2. Setting: Lynsted Lane at the A2 junction is physically limited by two listed buildings - The George Public House and 74 London Road. Because the lane is so narrow, the junction is a clear danger to pedestrians without any alternative means of approaching the services on the London Road, most particularly for wheelchairs and pushchairs. The lack of safe pedestrian access along this stretch also means that "active travel" options for the proposal, even for the short distance of 65 metres between the development and the A2, cannot be achieved.

The proposal site also backs directly onto three listed buildings that would lose their historic setting and openness to the south of the A2 - namely 70, 72 and 74 London Road (all Grade II). The Site will also intrude on nearby listed buildings on the south of the A2 - namely, 42, 52, 54-56 London Road.

3. AQMA5: The proposed site is adjacent to AQMA5 and would add seriously to congestion along this narrow lane, onto the junction with the A2 without any possibility of mitigation. A 'citizen science' survey on the A2 London Road in this area gives continuous measurements of four harmful pollutants identified by Government. That data measure bands of Very High and High pollution exceedances that diffusion tubes fail to capture. Air pollution is a matter of major concern and continuing research demonstrates its adverse impact. NPPF Guidance obliges SBC, when looking at development proposals, to make sure pollution inputs are reduced. In AQMA5, any significant housing development will inject additional traffic pollution.

4. Coalescence: This proposal, taken together with the larger site, threatens coalescence between the A2, as far as Vigo and Batteries to the south and eastward towards the Conservation Area of Cellar Hill that has its own distinct identity and concentration of Listed Buildings. This coalescence is contrary to the recommendations in the report commissioned by SBC and published in January 2021 which identified an "Important Local Countryside Gap" between the Parishes of Teynham and Lynsted.

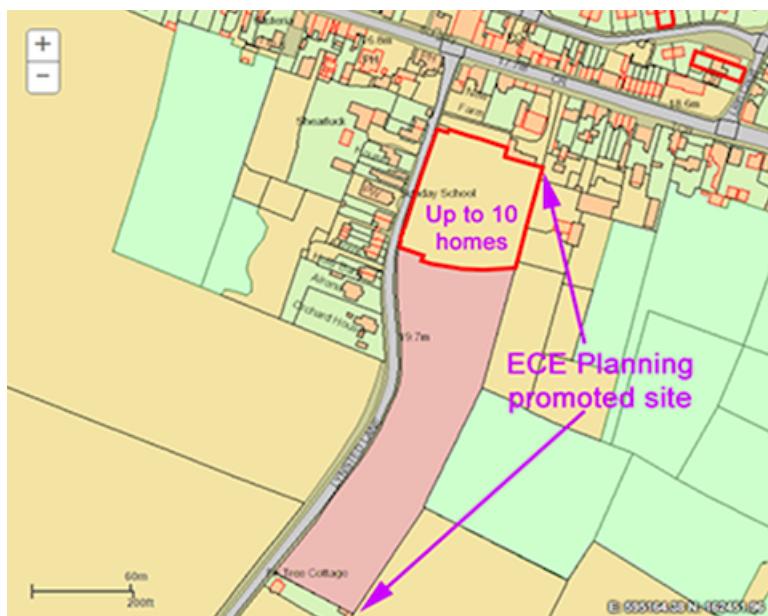
5. Inconsistent with NPPF: The proposal is not compliant with the policies in the NPPF, including the importance of using Lower Grade land first, rather than BMV land. The proposed site is greenfield and rural, which would have a disproportionate impact on the make-up, size and geography of the Parish. See Defra map below which shows the site coloured blue.

6. Contrary to SPG: This proposal conflicts with adopted Supplementary Planning Guidance - the Lynsted Parish Design Statement. In particular, the important historic pattern of development along the A2 and its rural lanes at “one building deep” leading to the identification of a Sensitive Edge immediately behind homes in Lynsted with Kingsdown Parish on the south side of the A2.

In view of the representations above, the Parish Council recommends that this application be REJECTED.

Yours faithfully

JULIEN SPEED
Chairman
Lynsted with Kingsdown Parish Council



The developers are ultimately planning up to 50 houses, not 10.



View from Lynsted Lane looking towards the junction with the A2. The proposed site access is to the right of the silver 4WD vehicle in the foreground. Note the narrow pavement on the left, which disappears altogether where the bus is positioned. The pavement on the right is exceedingly narrow. Picture taken at 17.00 on 26 May 2021.



The proposed site for the whole development, which ultimately stretches from the London Road heading South down Lynsted Lane to Fir Tree Cottage, is classified Grade 1 agricultural land (source: Defra).