

## **LYNSTED with KINGSDOWN PARISH COUNCIL**

26 October 2021



**Application Nos: 21/503906/EIOU and 21/503914/EIOU**

**Address: Land to the West of Teynham / Land South and East of Sittingbourne**

**Commenter Name: Lynsted with Kingsdown Parish Council**

**Commenter Type: Parish Council**

**Stance: Objection to the Planning Applications**

Dear Sirs

These two applications cannot be considered in isolation from each other as they are promoted jointly by the applicant to deliver a relief road joining Sittingbourne industrial estates to the north to a new M2 junction 5a to the south. Delivery of that relief road depends on housing and commercial developments across the whole combined site.

The applications should not be considered at the present time on the grounds of Prematurity. Paragraph 49a of the NPPF states that applications are 'premature' when the "development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by pre-determining decisions about the scale, location or phasing of new development that are central to an emerging plan".

If granted, these applications would result in continuous construction for 30 years and would see 95ha and 579ha of land turned to residential and commercial urban uses, with Best Most Versatile land being lost forever. They are clearly, therefore, "substantial".

Paragraph 49b of the NPPF notes that the prematurity test requires the emerging Local Plan to be "at an advanced stage but is not yet formally part of the development plan for the area". At the point when these planning applications were validated, the Swale Local Plan was at the Regulation 19 stage. Therefore, the applications, when submitted, would have failed the prematurity test. The current Reg18 consultation is a continuation of that due process.

These proposals significantly undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development, and the overall spatial strategy. If these two linked applications are granted permission, they will force the future direction of the plan.

Paragraph 15 of the NPPF notes that a Local Plan should be “a platform for local people to shape their surroundings”. In this situation, if Highsted Park/Land West of Teynham were to be given the go-ahead, local people will have had no opportunity to shape their surroundings via the local plan because that process will have been avoided by the developer.

The Prime Minister recently signalled a change in the Government’s planning policy, with a new focus for housing development on previously developed sites as opposed to greenfield land. It is also likely that housing targets in the South-East will be re-assessed. Swale Council should therefore clarify the impact on housing growth and spatial strategy before even considering major construction applications such as these.

The scale and location of the proposed developments will impact the local farmlands and our ability to produce local food. According to the DEFRA website, much of this area is classed as Grade 1. There is a national need to protect this land for future food production.

Building 9,250 new houses will bring over 16,000 more cars to the area – there are an average of 1.76 cars/vans per household in rural areas in the South-East. Constructing new roads does not mitigate the problems of traffic congestion. According to a CPRE study [“The end of the road? Challenging the road-building consensus”], a new road in a rural area attracts 40% more traffic before a single extra house is built. So, the impact of this proposal could be significantly greater.

The proposed sustainable transport strategy supporting both applications would not reduce or mitigate additional car travel arising from 9,250 homes, and those vehicles are all likely to use the A2 at some point for shopping and other journeys that cannot realistically be made by public transport or ‘active travel’ modes.

We already have three Air Quality Management Areas (AQMAs) between Sittingbourne and Ospringe. Poor air quality damages internal organs, worsens chronic heart and lung disease, and worsens type two diabetes – every year 13,000 people die due to polluted air. The existing pollution problems across the whole A2, but especially in AQMAs, would be severely exacerbated by the applicant’s plans.

Paragraph 174 of the NPPF states that “planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystems – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”.

These applications will result in development within the countryside, contrary to the NPPF. Some of the roads within the application sites are designated as rural lanes. Adopted Local Plan policy DM26 seeks to resist development that would either physically, or as a result of traffic levels, significantly harm the character of rural lanes. Policy requires development proposals to have particular regard to their landscape, amenity, biodiversity and historic or archaeological importance.

The proposals will lead to an increase in traffic through rural lanes such as Lower Road, Teynham and cause disruption of access to the pathway networks both north and south of Teynham Village. This will present highway safety issues for vehicles, cyclists and pedestrians.

Substantial development will be located within the Important Countryside Gaps designated in the adopted Local Plan. It will result in an amalgamation of Teynham and Tonge parishes with the settlement at Bapchild and the edge of the Sittingbourne developed area. This is in direct conflict with the objectives designating Important Countryside Gaps which is to avoid coalescence in order to retain the character and identity of villages and rural settlements.

Swale will lose, or suffer damage to, the few examples of ancient woodland that exist in the Borough - in the southern development - and groundwater supporting springs and marshes and creeks to the north. These huge developments will undermine national targets on greenhouse gases - there are few more effective carbon-fixing environments than highest quality agricultural land and chalkland features.

Conversely, there are few more damaging substances than concrete production and the resulting cauterising of the natural world. Our hamlets and villages will no longer sit in a natural landscape that have defined our sense of place. Enjoyment of our environment for mental and emotional health (highlighted by life under Covid19) will be defined by an anonymous, urbanised, manicured and arid landscape.

The developer's documentation acknowledges that both applications will result in the loss and destruction of habitats and direct threat to wildlife. We doubt the ability of these developments to mitigate the harm they will cause to biodiversity and ecological interests.

These ecological impacts, including the loss of the Highsted Quarries Local Wildlife Site (21/503194/EIOU1) and the loss of irreplaceable habitats such as ancient woodland and hedgerows are unacceptable. The biodiversity net gains claimed across both applications are unrealistic and we do not see how these can be relied on at this initial stage.

The impact on heritage assets across both applications is significant and will adversely affect important listed buildings and cause substantial harm to the Tonge Conservation Area in particular. Heritage assets across both sites will experience harm to their settings and significance, which is contrary to the NPPF and Swale Local Plan policies.

The combined effect of 9,250 houses across both applications raises significant questions as to how the development will interact with the existing drainage network. The proposals make no commitment to exploring detailed methods of rainwater separation and we envisage more frequent incidence of storm release carrying raw sewage into our domestic environment and out to sea - occasioned by increased hard surfaced areas and demand, combined with the inadequacy of the current drainage infrastructure.

There are also concerns regarding the additional strain on local water supplies. Some villages already struggle with loss of pressure and this will only deteriorate with another 9,250 houses plus commercial, business and other non-residential institutions.

Finally, we have a chronic shortage of GPs in Swale, allegedly the worst patient to doctor ratio in the country - one doctor for every 3,342 patients. The developers promise to construct buildings for medical facilities, but this is meaningless if doctors and nurses cannot be persuaded to come and work in them.

In conclusion, these two developments would not meet the accepted definition of sustainable development, namely “to satisfy the needs of the present without adversely affecting the conditions for future generations”. They will result in environmental, ecological and historical losses and will have adverse impacts on our roads, infrastructure and general health & wellbeing.

The loss of habitats, woodlands, trees and landscape will erode the very fabric of our local communities.

These proposals are not so much ‘garden village’ as urban sprawl. They fail to meet the intention behind Central Government policy of creating a fully autonomous and newly imagined community, with provision of infrastructure to support ‘Building Better’ ambitions and fewer demands on vehicles. Instead, the core rationale is the inclusion of the northern and southern relief roads which is a manifesto for ‘Building for Cars’.

Yours faithfully

**JULIEN SPEED MA (Cantab)**  
**Chairman**  
**Lynsted with Kingsdown Parish Council**