

APRIL 2021

LYNSTED UNDER THREAT?

LYNSTED WITH KINGSDOWN PARISH COUNCIL

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SUBMIT YOUR COMMENTS BY 30 APRIL



*Julien Speed, Chairman
Lynsted with Kingsdown
Parish Council*

The Local Plan Review currently being consulted on sets the development strategy for Swale to 2038. The draft plan contains major development within the Parish – in particular the Teynham Area of Opportunity (the TAO).

Swale Borough Council (SBC) has indicated the TAO could be used to bring forward around 1,100 extra homes – of which 300+ would be in Lynsted. That’s a housing increase of about 60%. Worse still, a bypass is proposed south of the A2 London Road that would effectively carve up our historic Parish.

Your Parish Council is working on a detailed submission to SBC setting out its concerns. We have engaged specialist local planning lawyers and Counsel to provide advice and assistance.

We are concerned this consultation is the first opportunity to make residents aware of the TAO and bypass. These proposals are buried within over 1000 pages of documents including a draft Local Plan and appendices. This is not in compliance with what is expected of SBC in its engagement with local businesses and residents – both in what SBC has promised previously, and what it is obliged to do. We do not consider the process followed by SBC has been undertaken in accordance with their Statement of Community Involvement (which can be viewed on the consultation website).

The TAO has been included in this draft plan, but was not referenced in an earlier consultation in 2018. This failure to consult on a major Policy issue demonstrates a lack of commitment to actively engage with the Parish. Further, as the draft plan makes clear, the TAO is being included

without the formulation of a masterplan for the development. That is to follow at a later date – presumably after the plan has been given the green light by the Secretary of State for Housing, Communities and Local Government.

This is not an acceptable way to include and sign off a proposal such as this – when local residents simply do not have enough information or detail. The manner in which the TAO and bypass have been “dropped” into the Parish at this late stage should be of concern to all residents as it is for your Parish Council.

There are some positive aspects to the Local Plan – it sets out greener, more environmentally friendly places to live; zero-carbon, energy-efficient housing to meet SBC’s climate and ecological targets; plus plans to double the required 10% biodiversity gain.

However, from our analysis the proposals pose a real detriment to the local area. It is apparent that SBC does not understand enough about the Parish, nor has it considered sufficient evidence. We have concerns about the local impact in terms of the size of the development and increase in traffic (with associated pollution issues) that will inevitably arise from a residential development of this size on the existing roadways – as well as the effect on the local amenity and surrounding countryside.

When we asked the chief executive of Swale Borough Council, she responded:

“You might be interested to note that the development strategy in a local plan does not need to be ‘the most appropriate’ but ‘an appropriate’ strategy”.

We find it regrettable that SBC considers this plan to be ‘good enough’ – as opposed to ‘the best’.

HOW TO SUBMIT YOUR COMMENTS

The Local Plan Review can be found here: <https://swale.gov.uk/planning-and-regeneration/local-plans/local-plan-review>

The Consultation runs until 30th April 2021. You can provide feedback either online through the consultation portal, or by completing SBC's "interactive representation form" – which can also be sent to SBC via post. The interactive form includes the ability to include continuation sheets, as the boxes provided for comments are relatively small. SBC has also provided some guidance notes.

Whilst the draft Local Plan is easily accessed online, hard copies will be provided upon request via email: Lpcomments@swale.gov.uk

We encourage you to read and consider the draft Local Plan in full, as there are proposals other than the TAO that have an impact on the Borough generally. Should you wish to comment, either for or against, then address your points by reference to the specific paragraphs.

The details of the TAO can be found in Section 5 at paragraphs 5.5.30 – 5.6 (pages 80-89).

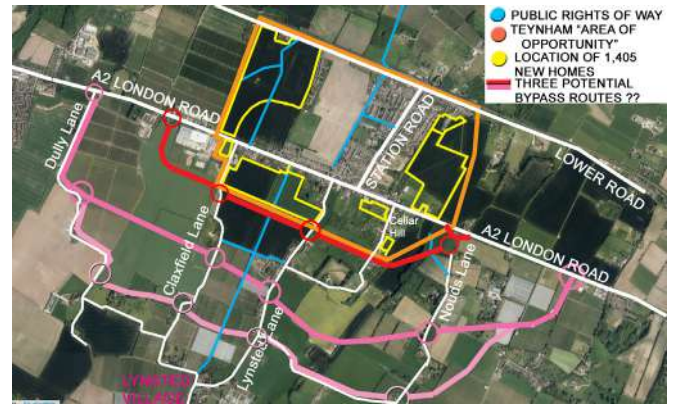
POINTS TO CONSIDER WHEN ASSESSING 'SOUNDNESS'

Bear in mind that when it is examined, the Secretary of State will be looking to see if the plan is "sound" before recommending that SBC adopt it, or modify it. If the Government does not consider it sound, the recommendation may be that it is withdrawn.

SBC's guidance notes set out the test of soundness as follows:

Plans are sound if they are:

Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements



The route for the Lynsted bypass has not been confirmed – but it could be one of the above.

with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF (National Planning Policy Framework).

The aim of a Local Plan is to shape development for the Borough in line with Government requirements. The effect that proposals will have on house prices, or types of development you are personally against, for example, are not matters that will be a factor.

To assist you in your consideration of the draft Local Plan and to help frame your representations, we have provided some of our own comments. Please feel free to consider them and, if you agree, you are welcome to use them as part of your response.

In addition to any "physical" effects of the proposals, you may also wish to consider the social and economic impacts that may arise from the development strategies being set out.



COMMENTS YOU MIGHT LIKE TO MAKE ABOUT THE LOCAL PLAN

1. The proposals in the Local Plan are based on an unsupported and unjustified growth strategy. The detail necessary fully to understand what is being proposed in Lynsted, Teynham and the surrounding area has not been provided, making it difficult for residents to fully comprehend the impact on the locality.
2. The TAO is being used to meet housing need, without Teynham being identified as a site for housing allocation. Any housing that forms part of the TAO will only be set out later on, in a separate document.
3. The TAO is being included without any real consideration having been given to its size. The boundary for the TAO is claimed to be “highly indicative”. Nor is there any evidence to support the proposal. There are no proper assessments as to traffic increases, air pollution, infrastructure, impact on the landscape or local bio-diversity.
4. The proposal for a bypass is set out at such a high level that consultation is meaningless, so it should not be included within the draft Local Plan at this time.
5. No feasibility studies have been undertaken in respect of the bypass and connections to the existing road network that are considered to be necessary for the TAO. For example at the SBC Local Plan Examination, August 2019, Kent County Council Highways expressed concerns as to the implications of local plan growth for the local highway network, principally at that time the A2 corridor between Teynham and Newington.
6. No assessments of the impact of the proposed TAO and bypass on the landscape, local amenity and wildlife have been included. This suggests that no positive assessments exist – if they did, surely they would have been presented to us?
7. The TAO appears to have been included without any consideration as to alternatives within the Borough.





8. The TAO and bypass cannot be considered to be deliverable within the period the Local Plan covers. There is a lack of any evidence or assessment that the infrastructure needed to deliver the TAO will be possible.
9. Despite promises from SBC, there has been insufficient consultation on the draft Local Plan. There was a promise for a second Regulation 18 consultation in Summer 2019 – with the express aim of consulting on alternatives for development in the Borough, as well as an initial indication as to SBC's preferred approach. This did not happen, and it is only now that the Parish has become aware of the TAO and bypass being preferred options. No alternatives have been consulted on.

10. Policy DM 27 is designed to preserve 'important local countryside gaps', aimed at retaining individual settlements. Such important gaps have been identified at paragraph 5.5.37 between Teynham and Bapchild, and Teynham and Lynsted. The TAO is not compatible with this approach and will result in the merging of settlements – not the preservation and retention of their individual characteristics. The local character and independence of these settlements in particular will be lost forever.

11. The proposals conflict with the Lynsted Parish Design statement, which is Supplementary Planning Guidance adopted by SBC. 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 Parish on the south side of the A2. The only other "Sensitive Edge" is also threatened by the TAO bypass proposal as it crosses into the Lyn Valley behind Cellar Hill Conservation Area. This is a delicate and rare chalkland course of a nailbourne.





12. The TAO, if ever developed, will result in significant increases of traffic and associated congestion and air pollution issues - already subject to enhanced monitoring due to the poor air quality within the locality (AQMA5) and neighbouring areas (Ospringe and East Street, Sittingbourne). The existing road network will be unable to cope with the increased vehicle use. All the new housing will feed onto the A2 between the ends of the bypass – defeating the purpose of the bypass to protect our communities north and south of the A2.
13. The increase in air pollution presents a real health risk to the local population. The methods used by SBC to monitor air quality in the area are not adequate to return sufficient data to enable an in-depth study into the potential impacts of what will be a significant increase of traffic.
14. The existing local amenities are unable to support a development of the size of the TAO. The area is woefully short of health and dental care provision, schools, local shops and office space. There are no concrete proposals in the Plan for these amenities to be improved.
15. This plan is not consistent with the policies in the NPPF. Firstly, the importance of using Lower Grade land first, rather than building on Best Most Versatile (BMV) land that forms the Fruit Belt immediately south of the A2. Secondly, the NPPF requires plans to identify land for development to meet housing needs over the plan period. That has not been done here.

Remember, you are being asked to comment on the draft version of the Local Plan that could be the final document sent for approval. The houses and bypass might not be physically built until 2028, but the decision to build them in principle would be made now if the Plan is adopted.

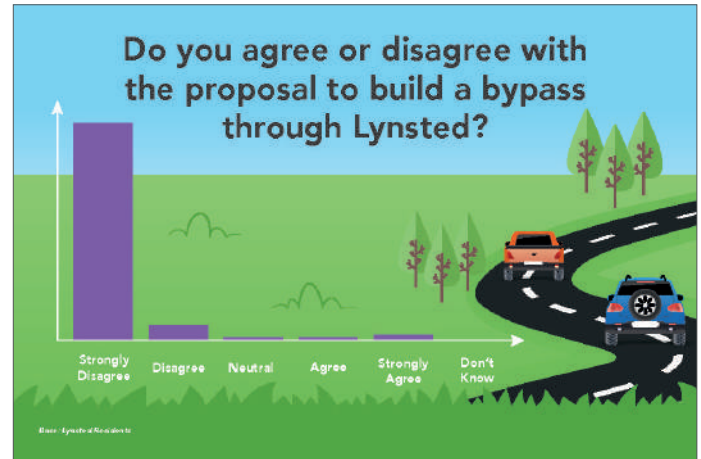
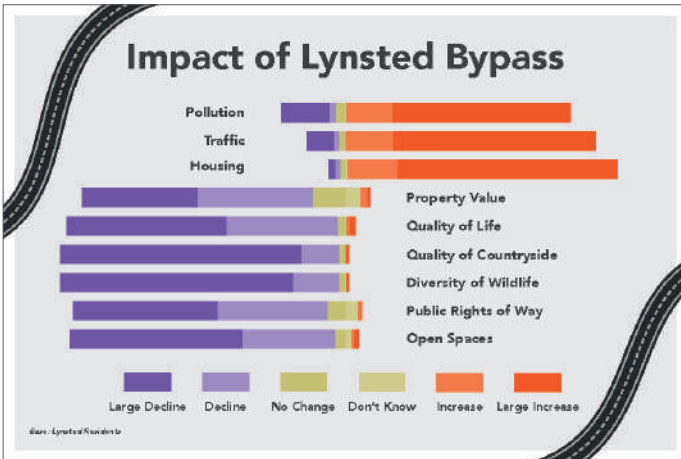
It is also important to state, if you so wish, that you would like the opportunity to present your comments to the Planning Inspector when they conduct the Examination in Public. That doesn't commit you to speak, but it gives you that option.

If you would like to access links to the relevant pages on the Swale Council website, please visit the LKPC website where the links are available: www.lynstedwithkingsdownparishcouncil.co.uk

If you would like further help with submitting your comments, you can contact the parish clerk on **07778 591909** or email her at: lkpc@hotmail.co.uk



RESOUNDING 'NO' TO BYPASS PLAN IN PARISH SURVEY



Over 95% of residents in Lynsted disagree with Swale Borough Council's plan to build a bypass in their parish, a new poll has found – with 89% saying they strongly disagree.

The survey was carried out by Lynsted with Kingsdown Parish Council to assess perceived impacts of the proposed bypass, which is included in the Swale Local Plan Review.

The quality of farmland/countryside would decline, according to 94% of all respondents, whilst 93% thought the diversity of wildlife and habitats would suffer.

A total of 261 residents completed the online poll – with 67.5% living in Lynsted, 21.5% in Teynham and 11% in neighbouring areas.

92% of all respondents believed the likelihood of further housing development would increase, with 85% saying that overall quality of life would decline.

Other concerns voiced by Lynsted residents included an increase in pollution levels (77%) and an increase in traffic (87%).

There would be a decline in access to public rights of way such as footpaths (88%) and open spaces (92%) – whilst 80% were worried the value of their property would decline.

The poll was carried out online via SurveyMonkey between 11–21 March 2021.

Here are some of the comments from the survey respondents:

“This proposed bypass will not help relieve the major issue of too much traffic on the A2. It will kill off the present Teynham businesses that depend on passing trade, ruin the open green space of Lynsted and create more pollution without any significant advantage to the local residents – only a slight temporary improvement in traffic flow which will be negated by the increase of traffic from all the extra proposed housing”.

“This road would have to cut through some of the most attractive and tranquil countryside in the area and cause immense damage to the unique and beautiful Lyn Valley. A vast stretch of farmland will be lost forever... The village of Lynsted will be cut in half, historic lanes and paths destroyed and access to the countryside reduced”.

“The proposed bypass would change the village of Lynsted to an extent that I would have to consider moving away. An historic, picturesque and peaceful village would be ruined. To say I object is not a strong enough statement”.

If you object to the TAO, you're welcome to put the poster overleaf in your front window.

SAVE OUR VILLAGE

SAY



TO THE BYPASS

PROTECT OUR
COMMUNITY