

# LYNSTED with KINGSDOWN PARISH COUNCIL

17 August 2022



Dear Sirs

## **Planning application 22/502834/EIOUT**

We write to object to Planning application 22/502834/EIOUT: Land To The West Of Church Road, Bapchild, Tonge

### **GENERAL**

Whilst the application site does not fall within Lynsted with Kingsdown Parish, it is situated in a neighbouring Parish and the cumulative effects will have an adverse impact on our residents.

We understand that the land included in the application area is allocated for mixed use development comprising residential and employment uses under Policy MU2 of the adopted Local Plan 2017. However, this application constitutes a significant departure from the development envisaged. In particular, it is for up to 380 residential dwellings. This is 274 more than the limit of 106 set out in the policy. The proposal sees a significant shift in the balance of uses provided, with a greater focus on residential development and much reduced focus on employment provision.

The adverse effects of granting planning consent for much higher quantum of development than was planned for in the Policy MU2 allocation would outweigh the benefits when assessed against the other non-housing related policies of the NPPF and also those of the adopted and emerging Local Plans.

### **TRAFFIC**

The network of country lanes surrounding the site is not capable of accommodating additional traffic.

KCC Highways has identified significant failings in the assessment work supporting the scheme, not least a lack of analysis of how the primary junction at Swale Way/Great East Hall would operate. KCC concludes that "it cannot be agreed that the TA has demonstrated that the site has safe and suitable access as it does not contain any assessment of the junction. Neither does it provide an accompanying Stage 1 Road Safety Audit".

The development proposed would detrimentally affect highway safety - particularly on the local road networks surrounding the site to the south.

Church Road is identified as a Rural Lane of importance under policy DM26 of the Local Plan. The policy seeks to resist development which would either physically, or as a result of traffic levels, significantly harm the character of rural lanes. The applicant's case relies on the fact that the

development will have no primary access route onto Church Road as evidence that the development will not harm the character of the rural lane through increased traffic levels.

However, this does not take into account the wider potential for increased usage of Church Road as a more convenient cut through or by HGV traffic during the construction phase.

The permanent impacts once the development is complete will include the probability of additional traffic utilising Church Road – particularly given that a formalised primary access will be created on Lomas Road to serve six new houses which is located very close to the junction with Church Road.

Cars will be able to park along Church Lane and residents will walk a few yards through the trees to their homes. This short cut, bypassing the Swale Way, will both save them time/fuel and create a narrowed country lane which may make it difficult for farm traffic to pass.

## **PUBLIC TRANSPORT**

Public transport connections in and around the application site are poor. The nearest bus stops are on Tonge Road and Oak Road, the far side of the Great East Hall Estate to the west, and these only provide services into Sittingbourne. These two bus stops are some 900m away from the site. The nearest bus stop providing services to Faversham is about a mile walking distance.

The site lies over 1.5 miles from the rail station at Sittingbourne and the Transport Assessment and Travel Plan accompanying the application do not indicate any intention to provide for new bus stops within the site or to provide contribution or otherwise facilitate additional bus services to and from the site. Indeed, KCC's current policy is to scrap local bus services, not to augment them.

The proposal does not offer a sustainable transport strategy. It directly conflicts with the objective of both national and local plan policy which seek to locate developments in areas that provide sustainable transport connections.

Paragraph 105 of the NPPF states: "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes". Paragraph 110 says that in making decisions on development proposals Local Planning Authorities should ensure that "appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location". There is little evidence that this application has properly considered its currently unsustainable location or the ways in which it can improve sustainable transport options for future residents and businesses.

Policy CP2 of the adopted Local Plan also seeks sustainable transport patterns from new development and requires proposals to "achieve alternative access to all services through promoting access to sustainable forms of transport particularly bus, cycling and rail transport and improving interchange between them from the earliest stages of development". The application does not meet this requirement.

## **LOCAL HERITAGE**

There are important heritage assets located in close proximity to the proposed development including Grade I and II listed buildings, Conservation Areas and other local elements of historic interest.

There is a national and local presumption to avoid harm to heritage assets wherever possible (paragraphs 193 and 194 of the NPPF) and the Conservation Officer has acknowledged that some of the significance of the setting of the medieval Church of St Giles and the other listed farmhouses and buildings is derived from their rural setting. This would be compromised by expanding the allocation to accommodate additional dwellings and altering the distribution of development.

Paragraphs 201 and 202 of the NPPF state that where development proposals would cause substantial harm directly to or loss of a listed building, planning permission should be refused unless the harm/loss can be mitigated. Where less than substantial harm is caused, this harm should be weighed against the public benefits of the proposal. In our view, the public benefits of pursuing a higher quantum of development do not outweigh the harm that would be caused to the historic environment. The character of the traditional fruit growing area of the Borough plays a fundamental part in the historical evolution of numerous villages on the eastern side of Sittingbourne dating back to the medieval era. These links back to our past are irreplaceable and their loss would be of detriment to all of the parishes and villages that are affected, not least Tonge Parish.

If the principles of the established allocation were followed, and the quantum of development more aligned with the 106 dwellings envisaged, the site would have capacity to ensure sufficient separation is maintained and the significance and setting of Tonge's heritage assets are better protected.

Paragraph 189 of the NPPF recognises that heritage assets are an irreplaceable resource which should be protected. The rural setting of Tonge Parish would be substantially eroded. Tonge is a small parish threatened with being surrounded on all sides by new development and there is genuine concern that this small historic rural parish is being subsumed by the progressive expansion of Sittingbourne.

## **AIR QUALITY**

As a result of recognised congestion on the A2, a number of air quality management areas (AQMA) have been established along the A2 corridor. The combination of high volumes of traffic travelling at low speed through urban areas with frontages in close proximity to the road have contributed to poor air quality.

Six AQMAs have been designated in Swale Borough, four of which are located along the A2. AQMA 5 is located at Teynham/Lynsted indicating the severity of the existing air quality in the area as a direct result of traffic emissions.

This application would cause serious cumulative harm on at least four of the AQMAs (two in Sittingbourne, plus Teynham/Lynsted, and Ospringe). Any additional traffic generated by a significant development must, by definition, bring even greater harm to the residents of Tonge Parish as well as those in Sittingbourne and communities along the A2, including in Lynsted with Kingsdown Parish.

It is known that the impact of air pollution extends over half a mile either side of the A2 corridor which means the impacts of the already poor air quality are experienced in a much wider area of the settlement.

Within that half mile area are a number of primary schools including at Bapchild and Tonge, Teynham and Ospringe which means that children are regularly being exposed to high levels of airborne pollutants.

Given the rural location of the application site, car travel is essential to access shopping and services only available in the bigger settlements at Faversham and Sittingbourne – both of which require use of the A2, the Swale Way and routes that run through the identified AQMAs.

The sustainable transport strategy supporting the application will not significantly reduce or mitigate the additional car travel which will be generated by the extra 274 houses proposed.

Adopted Local Plan Policy DM 6 requires development proposals to demonstrate that they do not worsen air quality to an unacceptable degree, especially considering the cumulative impact of development schemes within or likely to impact on Air Quality Management Areas.

The potential impacts on Air Quality resulting from the expanded development proposed would be considerable and to allow the development to go ahead would bring about a significant increase in the concentration of vehicular traffic and resultant emissions on the eastern side of Sittingbourne. This would run counter to the Council's climate change objectives which seek to ensure that developments are resilient against climate change and do not make significant contribution to it.

## **HEALTHCARE AND OTHER SERVICES**

This application would exert additional pressure on the already limited services that are provided locally. Swale already has the lowest level of GP provision in the country relative to its population size. The Health Impact Assessment concludes that all five of the nearest GP surgeries have more patients than is recommended by the General Medical Council - well exceeding the recommendation of one GP per 1,800 patients.

Sittingbourne Memorial Hospital provides no Accident and Emergency service with the nearest A&E being at Medway Maritime Hospital located some 11 miles away.

The nearby village of Teynham has lost its only GP practice and villagers are expected to travel to Sittingbourne Memorial Hospital to access general healthcare. Following the imminent axing of local bus routes, it will only be possible to access this surgery by car.

This scheme also offers no direct provision of any other community infrastructure facilities or services. There are no shops or services currently in the Great East Hall estate and simply paying S106 monies does not indicate that any infrastructure will be realised.

For the above reasons we fully support Tonge Parish Council's objections to this application.

Yours faithfully

**JULIEN SPEED**

**Chairman**

**Lynsted with Kingsdown Parish Council**