

# Statement of Case

## Teynham & Highsted Community Action Group (Rule 6 Status)

Statement submitted to PINS 17 January 2025

<b>Site Address</b>	<b>Planning Inspectorate Application Reference.</b>	<b>LPA Ref No.</b>
Land to the South and East of Sittingbourne (known locally as the southern site)	APP/V2255/V/24/3355313	21/503914/EIOUT
Land to the West of Teynham (known locally as the northern site)	APP/V2255/V/24/3355314	21/503906/EIOUT

## **1. Introduction**

1.1. This Statement of Case is structured as follows:

**1. Introduction**

**2. Action Group's Statement of Case**

**3. Relevant Legislation, Policy and Supporting Evidence**

**4. Witnesses**

**5. Conclusion**

1.2. The Teynham & Highsted Community Action Group requested and was subsequently granted Rule 6 status in order to provide assistance to the Inspector in this Inquiry by calling evidence to assist the Inquiry in fully understanding the previous objections of the Parish Councils.

1.3. The Teynham & Highsted Community Group represents Doddington, Lynsted with Kingsdown, Newnham, Teynham, and Tonge Parish Councils.

1.4. This statement of case outlines the main arguments and evidence supporting the position of 'The Action Group' regarding the planning inquiries

- APP/V2255/V/24/3355313 (Southern Site)
- APP/V2255/V/24/3355314 (Northern Site)

1.5. It serves as a foundational document summarising our stance on the issues under consideration, and outlining the submissions and evidence that the Action Group intends to adduce to assist the Inspector in making her recommendation to the Secretary of State.

1.6. The Action Group has sought to adopt a constructive approach to working with other parties, including the LPA and other Rule 6 parties, particularly The Five Parishes Group. In furtherance of that approach, the aim of our evidence and submissions is to complement, not duplicate, that advanced by other parties to this Inquiry.

## **2. Action Group's Statement of Case**

### **2.1. Scope**

The Action Group has a range of significant concerns regarding the proposed Highsted Park development. While this statement of case primarily focuses on the key areas in which the Action Group intends to

call evidence, it is important to emphasise that the wider objections made when the application was before the LPA remain and should be considered. We have broader reservations about the development's overall impact - including environmental, social, and infrastructural considerations - much of which will be dealt with by other parties. This document will present our case with an emphasis on the areas where we intend to provide detailed expert evidence at the Inquiry, while recognising the wider context of our objections.

This Statement of Case primarily focuses on the following areas:

- Transport,
- Settlement Impact and
- Heritage.

## **2.2. Transport**

### **Transport Introduction**

The Action Group will present evidence that was not highlighted in the LPA Planning Officer's report to the planning committee relating to significant transport issues associated with both the Northern and Southern applications.

The evidence will be informed by ongoing discussions with National Highways (NH) and Kent County Council Highway Authority (KCCHA) to ensure that evidence is not duplicated.

Evidence is expected to cover the following issues although these issues may be revised in light of discussions with KCCHA and NH:

### **Transport Issue 1: Sustainable Travel**

The Action Group intends to demonstrate that the proposed Northern and Southern Applications do not represent sustainable development in transport terms. The matters that will be considered are the physical layout of the proposed development, the barrier to active travel caused by the Southern Relief Road, poor bus provision and poor accessibility to rail stations.

### **Transport Issue 2: Impact on Lower Road, Teynham**

Through evidence, it will be shown that the proposed development, particularly the Northern Application, is likely to have an unacceptable adverse highway safety impact on Lower Road, Teynham.

### **Transport Issue 3: Impact on A2 Through Teynham**

Likewise, it will be shown that the levels of increase in general traffic and in HGV movements on the A2 through Teynham and further east, generated by both the Northern and Southern Applications, is likely to have unacceptable impacts in terms of congestion.

### **Transport Issue 4: Impact on Ruins Barn Road/Woodstock Road Corridor**

Both the Northern and Southern Applications are likely to lead to an unacceptable impact on the Ruins Barn Road/Woodstock Road corridor in Sittingbourne in terms of congestion and the proposed mitigation prejudices travel by active modes.

### **Transport Issue 5: Potential for Rat-Running**

It will be shown that the predicted levels of congestion on routes into Sittingbourne and along the A2 are likely to lead to rat-running along inappropriate routes such as along Lower Road and through sensitive villages such as Borden.

### **Transport Issue 6: Failure to Allow for Induced Traffic**

It will be argued that the proposed development, in particular the Northern and Southern Relief Roads will lead to induced traffic that has not been allowed for in the supporting traffic modelling.

### **Transport Issue 7: Reserved Matters**

An overarching concern is that the Applicant seeks to reserve all matters, including access. The evidence will argue that this is not an acceptable approach given the 'scale' and potential for the proposed development to lead to very severe impacts on transport networks and local communities. There may be no realistic measures available to mitigate these impacts, if they are not properly understood at the planning stage.

## **2.3. Settlement Impacts**

The proposed development poses significant challenges to local settlements, affecting both their functionality and character. This section provides an outline of the far-reaching consequences of the development, incorporating personal accounts to illustrate the lived experiences of residents.

These perspectives provide a human dimension to the technical evidence, showing how daily life is impacted by issues such as increased traffic congestion, reduced accessibility, and the erosion of local character. By pairing these accounts with detailed analysis, we demonstrate the scale of the threat to our settlements and the urgent need to protect them from disproportionate and unsustainable development.

### **2.3.1. Representing Community Views**

The Action Group represents the local communities in Doddington, Lynsted with Kingsdown, Newnham, Teynham, and Tonge. This unified representation includes detailed local knowledge and firsthand insights into the impacts of proposed developments, often overlooked by other parties.

Through evidence, it will be shown that the Parish Councils have utilised various methods to collect feedback, ensuring inclusivity and comprehensive engagement, including community updates, public forums, exhibitions, council meetings and working groups.

### **2.3.2. Community Issue 1: Proposed development will exacerbate existing issues on London Road, Teynham**

Our evidence will draw on traffic surveys undertaken by the Applicant and rely on traffic flows provided by the Action Group's Transport Expert.

London Road, Teynham, already experiences significant congestion, limited off-road parking, and poor air quality within a designated Air Quality Management Area (AQMA5). The proposed development is expected to substantially increase traffic, particularly HGVs, exacerbating existing issues. This includes worsening air quality, with concerns about PM2.5 and

PM10 particulates, as well as increased noise and vibration, which pose risks to houses along the route.

Safety risks are critical for residents, pedestrians, and cyclists, as additional traffic will heighten hazards on the already overburdened road. Issues extend to neighbouring areas like Froggnal Gardens, where limited parking and restricted access further strain local infrastructure. The A2 section between Cellar Hill and Hempstead Lane is particularly vulnerable, having been the site of fatalities, including incidents involving a cyclist and a speeding motorist.

Additionally, increased congestion and reduced accessibility caused by the proposed development are likely to further harm local businesses along London Road, impacting the local economy. Many businesses are already struggling due to declining footfall and challenging trading conditions. Further disruption could lead to closures, reducing the vitality of the area and employment opportunities.

### **2.3.3. Community Issue 2: Provision of GP Facilities: Concerns over delivery and accessibility**

The proposal to include GP facilities is welcomed, addressing a critical healthcare need in Teynham and nearby communities like Lynsted and Conyer, which have lacked a local surgery since May 2022. As a result, residents are now reliant on (and have to travel to) overstretched GP services in Sittingbourne and Faversham.

However, there are significant concerns about the delivery of these facilities.

#### **1. Financial Pressures <sup>1</sup>**

The NHS has faced significant financial challenges due to rising demand for services and constrained resources. This has been exacerbated by inflation and the costs associated with recovering from the pandemic.

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<sup>1</sup>National Audit Office (NAO) NHS Financial Management and Sustainability July 2024  
<https://www.nao.org.uk/wp-content/uploads/2024/07/nhs-financial-management-and-sustainability.pdf>

### 2. **Operational Commitments**<sup>2</sup>

Securing operational commitments, such as funding and resources, has been a persistent challenge. This includes difficulties in maintaining and upgrading facilities, as well as ensuring that new projects are adequately funded and completed on time.

### 3. **Workforce Shortages**<sup>3 4</sup>

The NHS has experienced shortages in key workforce areas, including GPs, nurses, and specialist medical roles. These shortages can impact the delivery of health and care services, making it difficult to meet operational commitments.

There are around 111,000 unfilled whole time equivalent posts in NHS providers

Specific examples for NHS Kent & Medway Integrated Care Board include:

- a. **Trusts:** In March 2023, there were 31,709 whole-time equivalent (WTE) substantive roles in our NHS Trusts (4,543 WTE in community, 23,847 WTE in acute, and 3,319 WTE in mental health). There were 3,409 vacancies (9.71%) with the highest being for registered nurses (11.4%). In January 2023, the average rolling 12-month turnover of staff was 14.2%. In 2022/23, there was a £102.8m spend on agency staff.
- b. **General Practice:** In December 2022, there were 5,071 WTE practitioners employed in general practice, including 912 WTE GPs, 533 WTE nurses, and 1,243 WTE other health professionals providing direct patient care. Kent and Medway have fewer GPs per head of population than the national average.

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<sup>2</sup> NHS Providers (2024) Briefing on the financial challenges facing NHS trusts  
<https://nhsproviders.org/media/699325/member-briefing-on-nhs-finances.pdf>

<sup>3</sup> Nuffield Trust (2024) <https://www.nuffieldtrust.org.uk/resource/the-nhs-workforce-in-numbers>

<sup>4</sup> NHS Kent & Medway Integrated Care Board (KMICB) "KMICB People Strategy 2023 -2028" (P 7&8)  
[https://www.kentandmedway.icb.nhs.uk/application/files/3716/9883/0234/Kent\\_and\\_Medway\\_People\\_Strategy\\_2023\\_-\\_2028.pdf](https://www.kentandmedway.icb.nhs.uk/application/files/3716/9883/0234/Kent_and_Medway_People_Strategy_2023_-_2028.pdf)

- c. **Student and trainee pipeline:** A limited student and trainee pipeline to grow the local workforce challenges the retention of the existing workforce. The experience of placements for students and trainees is critical in influencing whether they will stay within Kent and Medway.
- d. **Ethical considerations:** While the diversity and experience that international recruits bring to the workforce are valued, there are ethical considerations around international workforce mobility.

#### 4. **Strategic Planning** <sup>5</sup>

Without a clear strategy for delivery of the proposed development with new facilities and services being provided at appropriate stages of development, the Action Group considers that there is a risk that new facilities and services may remain vacant or be repurposed. This can lead to inefficiencies and further strain on healthcare infrastructure.

**In addition**, the proposed location is accessible only by car. This setup reinforces vehicle dependency and limits access for vulnerable groups, including those without transport or with mobility issues.

#### 2.3.4. **Community Issue 3: Construction Traffic: Risks to Villages on A2–A20 Rat Run**

Wychling, Doddington and Lynsted sit on a narrow, rural rat run between the A2 and A20, officially designated as unsuitable for HGVs. Past development in Tonge demonstrated how these restrictions are ignored, with 71 HGV movements recorded in a single day. This caused significant road safety concerns, verge destruction, and surface damage, severely impacting daily life for residents.

The proposed Highsted development risks replicating this scenario, further straining local roads already overwhelmed by diverted traffic. Without robust controls, construction vehicles will

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<sup>5</sup> The King's Fund (May 2024), NHS Workforce in a nutshell  
<https://www.kingsfund.org.uk/insight-and-analysis/data-and-charts/nhs-workforce-nutshell>

exacerbate hazards and disrupt rural communities, threatening safety, infrastructure integrity, and quality of life.

### **2.4. Heritage**

The following topics were not covered in depth in the Parish Council reports already submitted, however the Action Group has considered Historic England's response and wishes to adopt it as part of its case.

#### **2.4.1. Heritage Issue 1: Significant level of harm to the significance of Grade II\* Frogal Farmhouse.**

It will be shown that the proposed development would result in a significant level of harm to the heritage significance of the Grade II\* listed Frogal Farmhouse<sup>6</sup>, with the extent of harm approaching the upper threshold of "less than substantial"; and fundamentally transform the farmhouse's setting from a historic working agricultural landscape, which has remained consistent for over 700 years, to an urban environment. The proposal introduces elements wholly out of place within the established working agricultural context, undermining the landscape's historic continuity and authenticity. A new road and junction in close proximity to the farmhouse would further exacerbate the overall level of harm and further detract from the heritage asset. The rural economy and financial viability will also be impacted.

#### **2.4.2. Heritage Issue 2: High level of harm to the character and appearance of Tonge Conservation Area**

It will be shown that the proposed development will fundamentally alter the historic character and appearance of the conservation area from an area with a distinctive rural character to one with a strong urban character in its southern half, causing a high level of harm. This would be amplified by the auditory impact of vehicular movements, which would seriously erode the tranquil character of the conservation area.

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<sup>6</sup> <https://historicengland.org.uk/listing/the-list/list-entry/1069261>

**2.4.3. Heritage Issue 3: Cumulative impacts exacerbate heritage harm**

It will be shown that the combined effects of this development create cumulative impacts that amplify the harm to the historic environment. This includes detrimental changes to the wider rural landscape, undermining the settings of multiple heritage assets.

### **3. Relevant Legislation, Policy and Supporting Evidence**

The Action Group considers that the following legislation/policies is relevant:

#### **3.1. Legislation**

- Planning (Listed Buildings and Conservation Areas) Act 1990:
  - Section 66 (1) requires that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision-maker “shall have special regard to the desirability of preserving the building or its setting or any features of special architectural and historical interest which it possesses.”
  - Section 72 (1) requires that special attention should be paid to the desirability of preserving or enhancing the character or appearance of Conservation areas.
- Town and Country Planning (Development Management Procedure) (England) Order 2015.

#### **3.2. National Planning Policy Framework (NPPF)**

The December 2024 NPPF is clearly a material consideration for the purpose of this Inquiry. Of particular relevance are:

- Paragraphs 109, 110, 115, 116, 117 and 118 for Highways, addressing sustainable transport and mitigation of adverse transport impacts.
- Paragraphs 195, 202, 207, 208, 210, 212, 213, 215, and 219 for Heritage, focusing on the conservation of historic assets and their settings.
- Paragraph 101 Promoting Healthy and Safe Communities

#### **3.3. Local Policies, Frameworks and Reports**

**Swale Borough Council policies relevant to this case include:**

Bearing Fruits 2031: The Swale Borough Council Local Plan 2017 - policies:

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- CP2 (Core Policy 2): Focuses on promoting sustainable transport, reducing congestion, and supporting infrastructure that minimizes environmental impact.
- DM6: Protects the countryside from inappropriate development while supporting proposals that enhance rural economy and character.
- DM31: Safeguarding agricultural land that supports the rural economy.
- DM32: Protecting historic buildings from developments causing harm to their significance.
- DM34: Safeguards scheduled monuments and archaeological sites by ensuring preservation, assessment, and mitigation for development impacts.
- Swale Visitor Economy Framework Action Plan: Highlighting the importance of preserving local assets that contribute to tourism and community value.

### Transport Reports:

- Land West of Teynham (21/503906) and Land South and East of Sittingbourne (21/503914): **Transport and Highways Review** <sup>7</sup>, Railton TPC Ltd, June 2024
- Land West of Teynham (21/503906) and Land South and East of Sittingbourne (21/503914): **Transport and Highways Review Addendum** <sup>8</sup>, Railton TPC Ltd, September 2024

### Applicant's Reports:

- Highsted Park: Technical Note (Amended): Response Note to KCC Highways and Comments, C&A, August 2024 (TN 036A);
- Highsted Park: Response to National Highways Technical Report 09 July 2024, Montagu Evans, August 2024;
- Highsted Park: Technical Note (Amended): Response Note to NH July 2024 Comments, C&A, August 2024 (TN 037A);

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<sup>7</sup> Railton TPC Ltd for Teynham PC, Tonge PC (2024) **Transport and Highways Review** Responding to planning applications Swale/21/503906 (Northern Site) and Swale/21/503914 (Southern Site) [http://www.teynhamparishcouncil.org/Highsted\\_Files\\_To\\_Share\\_48523.aspx](http://www.teynhamparishcouncil.org/Highsted_Files_To_Share_48523.aspx)

<sup>8</sup> Railton TPC Ltd for Teynham PC, Tonge PC (2024) **Transport and Highways Review Addendum** Responding to planning applications Swale/21/503906 (Northern Site) and Swale/21/503914 (Southern Site) [http://www.teynhamparishcouncil.org/Highsted\\_Files\\_To\\_Share\\_48523.aspx](http://www.teynhamparishcouncil.org/Highsted_Files_To_Share_48523.aspx)

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- Land West of Teynham: Technical Note: Response Note to KCC Highways and PROW Comments, C&A, July 2024 (TN 034A);
- Land West of Teynham: Response Note to NH July 2024 Comments, C&A, August 2024 (TN 035A)
- Highsted Park Planning Statement Addendum, Montagu Evans, August 2024
- Land to the West of Teynham: Transport Assessment Volume 2: Strategic Justification and Policy Context, Charles and Associates, January 2024 (16-023-R5001 Rev C)
- Land to the West of Teynham: Transport Assessment Volume 3: Site Context, Charles and Associates, January 2024 (16-023-R5002 Rev D)
- Land to the West of Teynham: Transport Assessment Volume 4: Development Proposals, Charles and Associates, January 2024 (16-023-R5003 Rev A)
- Land to the West of Teynham: Transport Assessment Volume 5: Sustainable Transport Strategy, Charles and Associates, January 2024 (16-023-R5004 Rev D)
- Land to the West of Teynham: Transport Assessment Volume 6: Highways Infrastructure Proposals, Charles and Associates, January 2024 (16-023-R5005 Rev A)
- Land to the West of Teynham: Transport Assessment Volume 7: Traffic Impact Appraisal, Charles and Associates, January 2024 (16-023-R5006 Rev E)
- Land to the West of Teynham: Transport Assessment Volume 8: Mitigation Proposals, Charles and Associates, January 2024 (16-023-R5007 Rev D)
- Land to the West of Teynham: ES Addendum: Volume 1, Main Text, Entram, January 2024 (16-023-R5007 Rev D) (Section 7 Transport and Access)

### **Consultee Responses and Applicant's Response to Consultees:**

- KCC Comments on Land South and East of Sittingbourne, 01 March 2023 (comments on 2022 updated TA)
- Response to KCC Actions, Technical Note, C&A, February 2024

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- Technical Report: Highsted Park Applications, Sittingbourne, JSJV (on behalf of National Highways), 31 January 2023
- Technical Report: Highsted Park south, Sittingbourne, JSJV (on behalf of National Highways), 04 October 2024
- Response to NH Actions, Technical Note, C&A, February 2024

### Transport Guidance:

- Environmental Assessment of Traffic and Movement, Institute of Environmental Management and Assessment (IEMA) Guidelines, July 2023
- Planning for Walking, Chartered Institution of Highways and Transportation, January 2018
- Buses in Urban Developments, Chartered Institution of Highways and Transportation, 2015
- Deepening the Understanding of how to Address Induced Travel on the Strategic Road Network, WSP on behalf of DfT, December 2020
- Latest Evidence on Induced Travel Demand: An Evidence Review, WSP on behalf of DfT, May 2018
- The Impact of Road Projects in England, Sloman, Hopkinson and Taylor, March 2017
- Collision rates for rural roads 2023:  
<https://www.gov.uk/government/statistical-data-sets/reported-road-accidents-vehicles-and-casualties-tables-for-great-britain#road-type-ras03>
- Nomis Table QS701W for E01024629 and E01024623 (Bapchild and Teynham) and for Sittingbourne Built Up Area
- Bearing Fruits 2031, SBC, adopted 26 July 2017
- TA 46/97 Traffic Flow Ranges for Use in the Assessment of New Rural Roads (DfT, February 1997 (withdrawn))
- TA 79/99 Traffic Capacity of Urban Roads, DMRB, Volume 5 Section1 Part 3, Highways Agency, May 1999 (withdrawn)
- DfT Circular 01/22 Strategic road network and the delivery of sustainable development

## **4. Witnesses**

### **4.1. By Topic**

**Transport - Bruce Bamber BSc MA MSc MCIHT**

**Heritage - To Be Confirmed**

**Community - Julien Speed MA (Cantab) on behalf of  
Teynham & Highsted Community Action Group**

**Air Quality and Local Traffic Data - Nigel Heriz-Smith BA  
(Hons) MBA**

**Frognal Farmhouse - Paul Townson BEng**

### **4.2. Interested parties**

In addition to the witnesses listed above, several interested parties (members of the public) will present comments or objections, highlighting the potential impact of the development on themselves and their community. At the request of the Planning Inspector, the Action Group will endeavor to coordinate the participation of these interested parties.

### **4.3. Supporting Evidence Sources**

- **Air Quality Data**<sup>9</sup>  
This report provides quantifiable evidence of environmental impacts from increased traffic. Health harms from friction products will be inflicted on existing communities in the 'closed system' of the A2 between Faversham and Sittingbourne. There are many omissions in the Applicant's case which grossly misrepresent the likely real-world impacts at the kerbside - in communities such as Kingsdown, Doddington and Newnham - of the most dangerous pollutant (PM2.5).

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<sup>9</sup> Lynsted with Kingsdown Parish Council  
[https://lynstedwithkingsdownparishcouncil.co.uk/images/site-files/2024/LKPC\\_Air\\_Quality\\_response\\_Highsted\\_ParkLand\\_to\\_West\\_of\\_Teynham.pdf](https://lynstedwithkingsdownparishcouncil.co.uk/images/site-files/2024/LKPC_Air_Quality_response_Highsted_ParkLand_to_West_of_Teynham.pdf)

- **Community engagement** <sup>10</sup>  
Demonstrating the wide range of community engagement between the parish councils and the respective local communities.
- **Frognal Farmhouse Historic Building Appraisal** <sup>11</sup>  
The appraisal concludes that the significance of the manor, its local importance, the rich documentary resources associated with the estate, the ancient fabric preserved within its walls, and its complex development from medieval times to the early 18th century collectively contribute to a property of high historic and architectural significance.
- **Historical documents and references**  
These sources demonstrate the long-standing (c700 year) historical importance of Frognal Farmhouse and the enduring connection between Frognal Farmhouse and its agricultural surroundings.
  - **Frognal Farmhouse and Estate 1300 — 2025** <sup>12</sup>  
Timeline chronicles the history of Frognal (originally Frogenhall) and the former 400-acre working farm. It highlights ongoing research into the property's owners, tenants, key building developments, and its enduring connections with the local community and the church, including Canterbury Cathedral. The narrative is supported by extensive references to historic books, documents, including wills, tombstones, coats of arms, plus references from the National Archives, Kent History Centre and records/legislation from the House of Commons Library.
  - **Frognal Estate Map (1720)** <sup>13</sup>  
A hand-drawn map, stored in the archive of the Kent History Centre, illustrates the extensive boundaries of the Frognal Estate (at that time 408 acres), spanning from the

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<sup>10</sup> Doddington PC, Lynsted with Kingsdown PC, Teynham PC and Tonge PC (2025) A summary of community engagement 2021 to 2025 (2025)

[http://www.teynhamparishcouncil.org/CommunityEngagement\\_49169.aspx](http://www.teynhamparishcouncil.org/CommunityEngagement_49169.aspx)

<sup>11</sup> Canterbury Archaeological Trust Ltd (2021) Frognal Farmhouse Historic Building Appraisal Report Prepared by Rupert Austin. Report No: 2021/86 Archive No: 4641 [canterburytrust.co.uk](http://canterburytrust.co.uk)

<sup>12</sup> Towson, P and Breedon M (2025) Timeline of Frognal Farmhouse and Estate 1300 — 2025 <https://frognalfarmhouse.co.uk/history/timeline/>

<sup>13</sup> Frognal Estate Map (1720) Map of the lands in Teynham, Tonge and Bapchild belonging to Joseph Taylor, esquire © Kent History Library Reference U30/P1 [https://www.kentarchives.org.uk/collections/getrecord/GB51\\_U30\\_12\\_1](https://www.kentarchives.org.uk/collections/getrecord/GB51_U30_12_1)

site of the modern A2 road to Conyer and the Swale Estuary.

- **Development of Frogmal Farmhouse (west range) from hall house (pre 1400) to present day** <sup>14</sup>  
A set of six architect hand-drawn sketches captures the transformation of Frogmal Farmhouse over seven centuries. These illustrations, enriched with detailed annotations, depict its evolution from an open hall house to the distinctive back-to-back farmhouse seen today. This reinforces the age of the building.
- **Frogmal Estate Map and Sales Details (1884)** <sup>15</sup>  
Handwritten sales particulars highlight the farmhouse and describe the estate as containing “some of the richest land in the county of Kent.” A printed map depicts the Frogmal Estate extending from the location of the modern A2 road to Conyer and the Swale Estuary. These materials are preserved in the archives of the Kent History Centre.
- **Maps (Modern):**
  - **Agricultural Land Classification (England)** <sup>16</sup> Displays agricultural land quality in England, indicating grades 1-5. Frogmal Farmhouse and manor (farm lands) located on highly productive agricultural grounds.
  - **Parish boundaries** provide geographical context
  - **Accident Site Maps** <sup>17</sup>  
crashmap.co.uk maps and visualises the majority of all accidents on Kent roads.

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<sup>14</sup> Nicholas Blake (1995) Sketches: Development of Frogmal Farmhouse (West range) from hall house (pre 1400) to present day <https://frogmalfarmhouse.co.uk/history/drawings/>

<sup>15</sup> Daniel Smith, Son & Oakley (1884) *Plan of the Frogmal Estate (part of the 'Frogmal estate in Teynham, Tonge and Bapchild collection Ref U55/417 & U55/418 © Kent Achieve & History Centre.* [https://www.kentarchives.org.uk/collections/getrecord/GB51\\_U55\\_2\\_1\\_183\\_2](https://www.kentarchives.org.uk/collections/getrecord/GB51_U55_2_1_183_2)

<sup>16</sup> Department for Environment, Food & Rural Affairs. (2021). *Agricultural land classification map.* DEFRA. <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::provisional-agricultural-land-classification-alc-england/explore?location=51.332405%2C0.831405%2C13.20>

<sup>17</sup> Crash Map (2025) Crashmap search <http://www.crashmap.co.uk/Search>

- **Historic England Planning Response** <sup>18</sup>

Historic England objects to the proposed development near Frogna Farmhouse and Tonge Conservation Area, citing high harm to heritage assets, incomplete archaeological assessments, and NPPF non-compliance.
- **Traffic Surveys** <sup>19 20</sup> KCC and Local traffic data counts demonstrate existing strain on the local transport network.
- **Photographs & Videos:**
  - **Location photos & videos** show the impacted setting, including the setting of heritage assets and conservation areas.
  - **Traffic photos** illustrate potential impacts on the area, including traffic congestion and blocked routes.
- **Reports**
  - **General planning matters** <sup>21</sup>

In 2024, the Parish Councils issued a comprehensive report in response to the revised planning applications Swale/21/503906 (Northern Site) and Swale/21/503914 (Southern Site). This document provides a detailed analysis and insights into the proposed developments, highlighting key concerns and recommendations.
  - **2021 Planning Response** <sup>22</sup>

The Parish Councils initially addressed the planning applications for the Northern Site (Swale/21/503906) and Southern Site (Swale/21/503914) in a report published in 2021. This original report provided a detailed analysis of the proposed developments, outlining the key concerns and recommendations related to both sites.

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<sup>18</sup> Historic England (May 2024) Response to planning application Swale/21/503906/EIOUT (Ref:P01436344)<https://pa.midkent.gov.uk/online-applications/applicationDetails.do?activeTab=document&keyVal=QW87U5TY0XP00>

<sup>19</sup> Department for Transport, Road traffic statistics  
<https://roadtraffic.dft.gov.uk/manualcountpoints/56095>

<sup>20</sup> <https://aqma5.co.uk/>

<sup>21</sup> Teynham PC, Tonge PC (2024) General Planning Matters responding to planning applications Swale/21/503906 (Northern Site) and Swale/21/503914 (Southern Site)  
[http://www.teynhamparishcouncil.org/Highsted\\_Files\\_To\\_Share\\_48523.aspx](http://www.teynhamparishcouncil.org/Highsted_Files_To_Share_48523.aspx)

<sup>22</sup> Teynham PC, Tonge PC (2024) General Planning Matters responding to planning applications Swale/21/503906 (Northern Site) and Swale/21/503914 (Southern Site)  
[http://www.teynhamparishcouncil.org/Highsted\\_Files\\_To\\_Share\\_48523.aspx](http://www.teynhamparishcouncil.org/Highsted_Files_To_Share_48523.aspx)

- **Pollution threats arising from Highsted Park and West Teynham applications** <sup>23</sup>

A report written by Nigel Heriz-Smith. Report submitted on the planning portal by Lynsted with Kingsdown Parish Council.

## 5. Conclusion

In conclusion, the Action Group, with very strong and cogent reasons, opposes the proposed development due to its severe and far-reaching impacts on transport infrastructure, community safety, air quality, and heritage assets.

The Inquiry will be urged to consider the cumulative impacts of these proposals, which would fundamentally undermine the quality of life for existing (and future) residents and the sustainability of the community. Through our involvement in this Inquiry, we will be submitting that the Inspector recommends to the Secretary of State that both applications be rejected and permission refused.

**\*\* END OF STATEMENT OF CASE \*\***

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<sup>23</sup> Lynsted with Kingsdown Parish Council/Nigel Heriz-Smith (2024) Pollution threats arising from Highsted Park and West Teynham applications