

TEYNHAM PARISH COUNCIL

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Dear Sir/Madam

Re: Planning Applications 21/503906/EIOUT and 21/503914 EIOUT

Teynham Parish Council together with Tonge Parish Council jointly sought professional advice from a planning consultant, in order to draft a thorough response to the above applications.

This response strongly objects to the planning applications based on planning policy and feedback from our respective communities.

The response comprises the following executive summary, which identifies the key themes and grounds for objection. These themes are expanded on further in the full report.

EXECUTIVE SUMMARY

In-Principle Objection

- Teynham and Tonge Parish Council jointly **strongly object** to applications 21/503906/EIOUT and 21/503914/EIOUT.
- The development sites are not supported by local plan allocations and the 21/503914/EIOUT land has been rejected from the local plan process already. Significant concerns have already been raised about locating large scale development in Teynham in the emerging local plan including from KCC Highways and a legal challenge by Lynsted and Kingsdown Parish Council.
- Teynham has already delivered more housing than was allocated in the local plan. The villages do not have capacity to accommodate more.
- There are no material considerations which would outweigh development plan policy and actual harm caused by the proposals.

- The applications have been brought forward prematurely in an attempt to exploit the negative housing land supply position SBC currently find itself in. The developments proposed do not offer sustainable development either individually or collectively. **There are compelling reasons why the NPPF presumption in favour of sustainable development should not be applied.**
- The applications are interdependent and rely on road infrastructure mitigation contained in each application to support each other. This forms part of the carefully crafted planning strategy devised by the applicants to secure a much wider area of development than had been originally promoted.
- 21/503906/EIOUT and 21/503914/EIOUT do not offer an acceptable form of development in their own right and we do not accept that 21/503914/EIOUT should be approved as a means of mitigating the harm caused directly to both Parishes. **The impacts of both proposals are harmful, either individually or cumulatively.**
- The Prime Minister has set out in his recent keynote speech to the Conservative Party Conference that focus for housing development should be on previously developed sites and not on undeveloped greenfield land. We would urge SBC to clarify what this means for housing growth strategy in order to assess how these two applications would accord with the wider direction of travel nationally and at local level.

Impacts on the Strategic and Local Highway Network

- The existing road structure around Teynham and particularly the A2 is not capable of accommodating combined development traffic from 9250 new homes. There is substantial uncertainty as to if and when the two proposed relief roads would be completed and in the interim it is inevitable that some development traffic will use the A2. The A2 is already over capacity and adding additional traffic to the road would exacerbate the existing congestion problems
- There are substantial uncertainties hanging over both the need for and the safety of introducing the proposed new junction J5a to the M2. SBC have already confirmed that a developer funded southern relief road is not an objective they are following, and National Highways has expressed concern that the road is not coming forward as part of the local plan process in the way that new access points to the strategic road network are required to do.
- The proposal will lead to an increase in traffic through rural lanes such as Lower Road, Teynham which presents highway safety issues for vehicles, cyclists and pedestrians.

Air Quality Impacts

- The issues of AQ across the Borough and particularly in Teynham are well documented. Teynham is already located within an AQMA. We have significant concern about any development that would result in additional traffic using the A2 increasing vehicle emissions and degrading AQ in this location further.
- The proposed sustainable transport strategy supporting both applications would not reduce or mitigate additional car travel arising from 9250 homes all of which are likely to use the A2 at some point for shopping and other journeys that cannot feasibly be made by public transport or on foot/cycle.
- AQ pollution is known to travel up to 1km either side of the A2 corridor. Within that area there are a number of primary schools and people have to live, work and spend leisure time here. Development which would exacerbate air pollution and put our children and residents at greater threat from related long term respiratory and other diseases should not be approved.

Erosion of Settlement Pattern and Character of Teynham and Tonge Parish

- Application 21/503906/EIOUT and 21/503914/EIOUT would result in substantial development being located within the Important Countryside Gaps designated in the adopted local plan.
- For Teynham and Tonge this will bring about an amalgamation of the parishes with the settlement at Bapchild and edge of 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.

Loss of High Quality and Productive Farmland

- Both applications will result in the total loss of Grade 1 and 2 agricultural land which is classified as being Best and Most Versatile. Planning Policy at all levels seeks to protect BMV from development and the loss of productive fruit farming land will exacerbate the growing problem of sustainable food production across the country

Harmful to the Landscape in and around Teynham and Tonge Parishes

- The proposed developments would introduce large scale urbanisation into area of undeveloped and open countryside. The applications acknowledge significant adverse impacts to the landscape which we argue cannot be mitigated on this scale.
- The landscape across both applications offers a stunning outlook across historic open countryside. Once lost this can never be restored.

- The Area of High Landscape Value contained within 21/503906/EIOUT and on the edge of 21/503914/EIOUT would be degraded and the conservation objectives of maintaining “remoteness” within these areas would be totally compromised.
- The character and quality of the landscape should be protected. The setting of the AONB will experience harmful change by 21/503914/EIOUT and the development will also cause harmful recreational impacts on the AONB to the south.
- The Kent Downs AONB Unit object strongly and we maintain that in accordance with the NPPF assessment the public benefits of the scheme/s do not outweigh the harm caused to the scenic beauty of the AONB, upon which “great weight” must be placed.

Biodiversity and Ecological Impacts

- It has been reported that *“Britain faces biodiversity collapse”. The UK has an average of only 53% of its biodiversity left well below the global average of 75%.....not enough biodiversity will lead to crop failures, infestations that could cause shortages in food, energy and materials”* (<https://theecologist.org/2021/oct/11/britain-faces-biodiversity-collapse>)
- The application documentation admits that each application will result in the loss and destruction of habitats and direct threat to wildlife. We maintain strong concerns about the ability of these developments to properly mitigate the harm they will cause to biodiversity and ecological interests.
- A number of European recognised wildlife sites lie in close proximity not least the Swale Special protection Area (SPA), Site of Special Scientific Interest (SSSI) and Ramsar site. We share Natural England’s concerns about the ability of application 21/503914/EIOUT to mitigate its recreational impacts on this protected area.
- The ecological impacts, including the loss of the Highsted Quarries Local Wildlife Site (21/503194/EIOUT) and the loss of irreplaceable habitats such as ancient woodland and hedgerows is unacceptable.
- The biodiversity net gain claims across both application areas are unrealistic and we do not see how these can be reliably calculated at this initial outline stage.

Impacts on the Historic Environment

- The impact on heritage assets across both applications is significant and we have very grave concerns about the impact on the most important listed buildings within both parishes and the substantial harm that will be caused to Tonge Conservation Area.
- Heritage assets across both sites will experience harm to their settings and significance which is contrary to the NPPF and Swale Local Plan policies.
- Historic England has submitted extensive representations objecting strongly

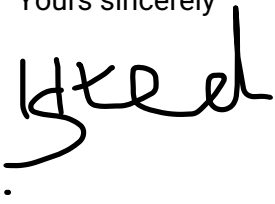
Pressure on Existing Local Infrastructure

- The addition of 1250 new homes in Teynham will exacerbate existing drainage and flooding issues. The combined effect of 9250 houses across both applications raises significant questions as to how the development will interact with the existing drainage network at this scale.
- The proposals make no commitment to exploring more 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 as a result of increased hard surfaced areas and demand and the inadequacy of our current drainage infrastructure.
- Teynham has limited shops and services and public transport links would not properly provide for the additional population being proposed. We do not see that the proposed development considers this aspect in any detail and the sustainable transport mitigation offered is unlikely to result in any meaningful reduction in car use given the location of these two sites in relation to other services.
- Healthcare services locally are already stretched, and we have significant concerns about the ability to mitigate the healthcare requirements for 1250 new homes in 21/503906/EIOUT without relying on the 2 medical centres coming forward as part of 21/503914/EIOUT.
- Notwithstanding this we are concerned about the timing of delivery of the proposed medical centres and the pressure that will be placed on existing healthcare services in the interim period.

Conclusion

- The impacts of these developments will be felt by residents of Teynham and Tonge parishes and all the other parishes affected for decades to come and the potential environmental, ecological and historical losses, impacts on our roads and infrastructure and general impact on our health and wellbeing is of great concern.
- Once we have lost the habitats, woodlands, trees and landscape that play such an important part in shaping the beautiful area that is this part of Swale, we can never regain them.
- Much of the history of how each of the villages in and around the proposed development areas has evolved over time is embedded in our historic landscape and buildings. Eroding the significance of these is to erode the fabric of our communities.
- We cannot see how this development would “*satisfy the needs of the present without adversely affecting the conditions for future generations*” – the commonly held definition of sustainable development.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Hayley Steel', with a small dot below the end of the signature.

Hayley Steel

Clerk to Teynham Parish Council

Enc: Full Report