



Teynham Parish Council Responding to planning application 23/505541/REM 'Frognal Place'

Prepared by: Teynham Parish Council Date: 3 February 2024

Overview

Outline planning permission was granted by Swale Borough Council in June 2021 under reference 16/507689/OUT for the development land at Frogmal Lane, Teynham for up to 300 dwellings; employment premises, sports ground and pavilion, public open space, including allotments and community orchard and access, a new link road and roundabout on to the A2; other vehicular/pedestrian/cycle accesses, a reserve site for a new health centre; and associated parking and servicing areas, landscaping, wildlife areas, swales and other drainage / surface water storage areas.

This outline planning permission remains live and confirms that the principle of the above development has been agreed. The outline planning permission agrees the basic principles of the development. The period for legally challenging this outline planning permission has passed and there is now no opportunity to influence whether this development should or should not happen. The details of how this development will be delivered and what it will eventually look like were always reserved for future consideration.

The details have now been published under planning application 23/505541/REM. This document responds to this application.

There is an opportunity for the Teynham Parish Council to have a say and to try to influence the way in which the development is delivered to the benefit of the local community through these reserved matter applications.

This document is based on formal and informal feedback, received by Teynham Parish Council and represents a range of community views. A draft copy of this document was shared within the local community to gather additional comments and feedback. In addition, the draft document and additional comment were discussed with members of the public at the Parish Council meeting held on 30 January 2024.

Teynham Parish Council,
3 February 2024.

Responding to planning application 23/505541/REM

Teynham Parish Council's principal observations are:

1. Planning

- 1.1. **Outline planning permission** — Outline planning permission was granted for the whole site for employment, housing and improved health facilities (16/507689/OUT). The concern is that the employment zone and the improved health services will not be delivered. Without an overarching Master Plan, and clearly linked planning constraints key components of the original policy MU4 and outline planning permission will be omitted, or regarded as someone else's responsibility to deliver.
- 1.2. **Improved GP facilities** — Policy MU4 required improvements to health facilities in the village. There are currently no GP facilities in the village. It is unacceptable for existing and c1000 new residents to travel to Sittingbourne or Faversham for their doctors. Planning conditions are required to ensure the new houses should not be occupied until medical/GP facilities have been built and operational within the village. There are significant concerns that the improved health services will not be delivered.
- 1.3. **Employment Zone** — 26,840 sq m of 'B' use class employment was a condition of the original policy (MU4) in the local plan. There are significant concerns that the employment zone will not be built and a future planning application will be submitted for change of use in order to build additional houses at a later stage.
- 1.4. **Sharing community concerns** — In October 2023, representatives from Teynham Parish Council and our planning consultant met with Chartway & Moat, the Frognaal Place developers, to fact-find and share a range of initial community concerns, before the application was published. The developers listened to the concerns, and indicated that they would reply within 2 weeks with an update. On two occasions, the Parish Clerk followed up on the conversation. A reply was received on 30 January 2024. NPPF (Dec 2023), para 131, highlights the importance of effective engagement between applicants, communities and local planning authorities.
- 1.5. **Related planning applications** — Many members of the public are not aware of the 15 related planning applications. The planning applications are not included on the 'related cases' tab in the planning portal. A number of residents have commented that they were unaware of the planned changes and have not received any formal communication, for example Public Rights of Way along the Ash Path ZR247 and across Frognaal Field ZR256 (to the west of Frognaal Lane) under 23/502682/SUB.

- 1.6. **Significant changes in local area** — Since the outline planning permission was granted there have been a number of significant changes in the local area. These changes need to be considered when assessing this application and planning constraints. Changes include:
 - 1.6.1. Loss of all GP facilities
 - 1.6.2. Loss of local bus services and reduced train service
 - 1.6.3. A2 at capacity
 - 1.6.4. Continued concerns about poor air quality on the A2 at Teynham
 - 1.6.5. Additional large developments have been constructed in the local area including Blossom Grove (Station Road, Teynham).
 - 1.6.6. Planning permission has been granted but construction has not yet started for a number of large-scale developments, including the redevelopment of Teynham Primary School and 380 houses in Tonge.
 - 1.6.7. Currently awaiting decision on c8000 houses as part of the Highsted development, of which c1300 houses are proposed on the land (adjacent to this application) between Teynham and Bapchild/Tonge.

2. Construction Phase

The construction phase(s) will significantly impact existing and future residents over an extended period of time over a number of years. Robust measures are required to protect the existing and future residents during the construction phase(s).

- 2.1. **Limited access to site** — The site is located west of the village centre and surrounded by existing residential housing. There is limited site access. Two principal public rights of way (ZR256 and ZR247) plus Frogna Lane are directly impacted by the proposed works.
- 2.2. **Impacted communities** — A wide range of individuals and groups will be impacted by this development. This includes: Neighbours, Residents in Teynham, Conyer and Lynsted, Businesses, Visitors, Children, Cyclists, Dog walkers, Horse & Riders, Walkers/runners, Sportspeople. Consideration should be taken to reach these diverse groups of people.
- 2.3. **High-level overview** — The construction phase(s) will impact large numbers of people over an extended period of time. A **consolidated** high-level construction time-line is required (covering all aspects of 16/507689/OUT) to help identify potential issues and prepare systems and processes.
- 2.4. **S106 Schedule 2 Part 1 Sub Phasing** states: No Commencement of Development shall take place upon the Land unless and until the Sub Phasing Plan identifying the different Sub Phase has been submitted to and approved in writing by the Borough Council.

- 2.5. **Planning constraints** — Robust measures are required to protect the community during the construction phase(s). A consistent message from many residents has been the need to set, monitor and enforce rigorous planning constraints. Requested planning constraints, include: Provide a 24/7 response line to manage issues; host monthly resident meetings; restrict construction operating times and not permit 24 hour operation
- 2.6. **Minimise impact** — It's essential to minimise the impact on day-to-day activities during the construction phase. For example: maintain access to property, services, emergency services & businesses; maintain a safe & pleasant environment; support community health & mental wellbeing.
- 2.7. **Cumulative Impact** — When combined with other local building/infrastructure projects there will be significant cumulative effect on the local community over an extended period of time (many years).
- 2.7.1. Other major construction projects in the pipeline include Teynham Primary School (access off Station Road, Teynham); and 10 houses on Lynsted Lane (access off A2); upgrading gas main along A2 etc.
- 2.7.2. Planning conditions are required to: Promote coordination across projects; Provide a 24/7 response line to manage issues; Coordinate enforcement officers.
- 2.8. **Construction travel & parking plan** — Parking will be at a premium during the construction phase. A comprehensive travel and parking plan is required, covering construction crew, visitors, materials (loading and unloading), equipment and the removal of waste. All construction parking to be on/within the construction site. No construction parking in residential streets. Define residential streets. Protect residential areas from unauthorised construction traffic. Access construction site only via the A2 London Road.
- 2.9. **Construction working times** — The project scale and location within the existing village, requires **robust** conditions to protect the local community. The local planning authority is requested to clearly define: The permitted working days/hours; Non-working days; Arrival/departure window (e.g max 45 minutes before/after work); Stringent penalties for infringements of these conditions. 24 hour working should be explicitly mentioned and prohibited.
- 2.10. **Complete community street furniture** — Learning from recent local housing development projects in Blossom Grove, Teynham, it's essential to ensure all the community components of the project are completed at an early stage, including street lights, street name plates, carriageways, pavements, highway drainage, access paths, parking and road markings) are in place at an early stage. Enforcement of planning conditions is essential.
- 2.11. **Enforcement** — The ability to enforce planning constraints is a concern. Dedicated enforcement officer(s) required.

- 2.12. **Maintain pedestrian access routes** — The development site intersects three main pedestrian access routes across the village. These are ZR247 (Ash Path); Frognal Lane and ZR256 (Frognal Fields). Significant effort should be placed on protecting and maintaining these routes during the construction phase or providing near-by alternative routes. Without proper planning, this will lead to significant diversions to/from London Road and Lower Road via ZR195 and Station Road. This will create a sense of isolation; restrict movement across the village and impact people from Teynham and Conyer plus neighbours in Lynsted. Short notice and frequent changes to routes should be avoided. This creates a sense of disempowerment and confusion. Diversions should run in parallel with the original route and be located within 10m of the original route and be suitable for all to access.



- 2.13. **Wildlife** — There are concerns about local wildlife and habitats during the construction phase.

3. Infrastructure

- 3.1. **Wastewater** — The capacity of the wastewater infrastructure is a major concern. The current wastewater pipe network and treatment plant in Teynham is unable to cope with the additional requirement from 300 dwellings. Wastewater tankers are currently in use. On 8 Nov 2023, Southern Water replied to planning application 23/503145/SUB: 'Southern cannot recommend discharge of Condition 33 related to foul drainage. Current foul sewerage capacity Southern Water will allow 50 initial dwellings to connect without reinforcement. Southern Water will review the rest of the units and advise on a development programme and the extent of network reinforcement required'.

- 3.1.1. **Planning conditions** are required to ensure Condition 33 is achieved.

- 3.1.2. **A holistic, long term view** should be taken on the wastewater requirements for the whole site (covered by policy MU4 and 16/507689/OUT).
- 3.1.3. Review risks linked to the connection of the old and new sewer infrastructure. Background: Residents of Frognal Lane Teynham frequently report discharge of raw sewage at street level.
- 3.2. **Private pumping station** — We note Southern Water's comments on the private foul water pumping station: "In order to protect the amenity of prospective residents, no habitable rooms shall be located within 15 metres to the boundary of the proposed adoptable pumping station, due to the potential odour, vibration and noise generated by all types of pumping stations."
 - 3.2.1. The private pumping station should be relocated away from the main access road. Reasons: Allow for future changes to the road layout; reduce impact of smell/odour on nearby residents and everyone entering/exiting the new development site.
 - 3.2.2. Consideration should be given to relocating the plant to the northern side of the site covered by MU4. This may require additional land to be purchased.
 - 3.2.3. Increase distance from pumping station to habitable rooms from 15m to 50m (for reference, consider smell/odours from Teynham water treatment works).
- 3.3. **Rodent protection** — Rodent protection, particularly on pipes leading to soakaway ponds and to/from properties, is required. All pipes, once laid, must be capped off.
- 3.4. **Traffic modelling** — New traffic modelling required to reflect significant changes, including loss of GP services; reduced train service; significantly reduced bus service; A2 capacity, remaining AQ concerns.
- 3.5. **Maintain existing services** — Based on past experiences, residents are concerned about the reliability and continuity of the existing services, in particular fresh water pressure, foul water drainage and electrical supply.
- 3.6. **District heating system** — Has consideration been given to a district heating system?
- 3.7. **Emergency services** — Do we require greater infrastructure for police and fire services?

4. Design

Based on the 'The Ten Characteristics' from the National Design Guidelines, Teynham Parish Council offers a range of feedback, with the aim of influencing a better design.

Context

- 4.1. **Links with the past** — Teynham is widely recognised as the origin of 'The Garden of England' with links to King Henry VIII. The recent discovery of Roman artefacts - of national importance - including a mausoleum and a stone statue of the Roman sea god Triton adds increasing interest in the area. Every opportunity should be taken to recognise, protect and celebrate these connections. For example, new road names should follow the Cherry name theme.
- 4.2. **Historic artefacts** — Further Roman and other historic artefacts may be located under the proposed development site. Planning conditions are required to protect recent finds and other artefacts on the development site. Consider a Triton themed name for access roundabout from the A2.
- 4.3. **Built Heritage** — There are two grade 2* properties within 500m of the development. Consideration should be taken to protect the historic setting of these buildings.

Identity

- 4.4. **Village identity** — Multiple requests for new village entry signs along the A2 with planters and new road calming measures.

Public Spaces

- 4.5. **Amenities (accommodation zone)** — There are no amenities in the accommodation zone. Use amenities to bring people together on a daily basis and create social interaction. e.g. A dedicated area adjacent to The Green, with Corner shop, Local cafe, post box, Community drop off point (eg Amazon collect point), notice boards, bins, dog waste etc.
- 4.6. **The Green (accommodation zone)** — This central square lacks impact. Consider making it a focal point with the focus on creating an adaptable space for neighbours to meet, socialise and hold small events. Suggestions include: Increase usable area; Define area through the use of different materials eg gravel paths and different lamp post design. Make it a destination by adding a cafe; corner shop; post box; parcel collection point etc. Add infrastructure to make it a flexible **small** events space. Remove roads on at least 3 sides.

- 4.7. **Allotments** — Enhance the allotment design to create a community asset and focal point. Align the allotment layout in a symmetrical design, running parallel to Frogna Lane. Add small secure storage shed(s), with grey water collection and storage. Allow at least 10000 litres of grey water storage for use by allotment holders. Create access to replace grey water storage in future years. Create an organic/green waste compost area. Create raised sections of allotment beds which are accessible for all. Create seating area(s) to bring people together. Incorporate gravel pathways to promote access and ground water drainage. Tarmac should be avoided. Protect the allotment area with high fencing, accessible by lockable gates(s).
- 4.8. **Pavilion (sports zone)** — Make the pavilion a community focal point. Maximise use of the outdoor space; Create a flexible space; Define area; Protect area from unauthorised access (eg cars; motor bikes on grass);
- 4.8.1. **External** — Pavilion very close to the main road junction. Move location away from road junction; Consider a 2m wide footpath on all 4 sides of the pavilion (to make the building accessible for all in all weathers). Add service ducts for future facilities (e.g. PA/CCTV) around the playing field area. Are PV & Solar panels available for this building (to minimise running costs)? What is the external lighting?
- 4.8.2. **Internal** — The current design will create a dark interior as the main windows face northwards; Additional equipment storage required. Secure post point required; Are there enough WC/urinals etc; There are only 4 changings rooms for 6 teams. What is the heating source?
- 4.8.3. **Parking** — There is insufficient parking for the 6 teams playing on the football pitches at the same time. Consideration should be given to additional parking space; space for 2 coaches/minibuses; automatic access gates and a turning circle should be considered
- 4.8.4. **Access to/from the sports facility** — Check the width of the car park entrance to the sports facilities to confirm it is suitable for large service vehicles and coaches. How will grass cutting vehicles/tractors access the sports ground? How will the rubbish bins be accessed and collected from the pavilion?
- 4.9. **Community Orchard** — The proposed Community Orchard, in our view, will be costly to maintain. A simpler woodland area for walkers, children and dog-walkers would be preferred.
- 4.10. **Public Bins** — Consideration should be given to general waste bins (inc dog waste) located on street and open spaces.
- 4.11. **Public Toilets** — Few public toilets are available in the area. Incorporate public WCs within the design. One resident suggested including the public toilets adjacent to the land near the doctor's surgery, and accessible for the allotment holders.

Movement

- 4.12. **Walkability and car-dependence** — CPRE published a housing design audit with Matthew Carmona. The importance of good design was highlighted. In the report they drew particular attention to 'Highways, bins and parking' as well as 'Walkability and car-dependence'.
- Source: <https://placealliance.org.uk/research/national-housing-audit/>).
- 4.13. **Active travel** — Teynham Parish Council supports the policy to promote active travel.
- 4.14. **People first** — The current design for the housing area is car centric. Shift the focus from cars to people. Suggestions include: Separate walking/cycling routes away from roads; Make walking/cycle routes more direct between focal points; Creating pedestrian only areas. If walking/cycling routes run adjacent to the roads add a planted buffer zone. Reduce the number of roads.
- 4.15. **Walking routes** — Define and publish walking routes across the proposed site and the wider Teynham area. Make walking/cycling a quicker option by creating shortcuts. How do you cross Frogmal Lane to access the open spaces; access the doctors (reserved site), shops, play areas, The Green, transport links, the primary school etc. Add outdoor seating.
- 4.16. **Walking access points** — Detail the access points on/off the site and add protection (e.g. wooden bollards) to prevent vehicle access to walkways.
- 4.17. **Run/walk circuit** — Create a 3km (or 5km) run/walk circuit to promote health and fitness around the circumference of the site. Consider incorporating this feature in the site perimeter buffer zone. Add outdoor seating.
- 4.18. **Protect walkways** — Protection required to prevent cars and motorbikes from accessing the pedestrian walkways for example the path between the site leading to Donald Moor Ave, PROW ZR247 (Ash Path), and PROW ZR256 (Frogmal Fields). Prohibit car movements from Donald Moor Ave to the new development.
- 4.19. **Crossing access road** — How will residents use PROW ZR256 to cross the access way on to the Frogmal Fields. This will become a busy road.
- 4.20. **Dog walkers** — There is a large community of dog-walkers in the local area. Create features that are dog friendly and promote responsible dog ownership, for example dog waste bins.

Uses

- 4.21. **Affordable housing (% and cost)** — Community concerns are that local residents are unable to purchase housing due to the high costs or block purchasing.

- 4.21.1. What housing lists will be used to identify potential residents for the new affordable housing?
- 4.21.2. Affordable housing should be released in phases depending on the location of the buyer e.g. Teynham, Sittingbourne/Faversham ; Kent, and National.

Roads and Access

- 4.22. **Frognal Lane** — Properties on Frognal Lane are significantly impacted by the road design and the significantly extended journey to/from the A2.
- 4.23. **Access road from A2 to the site** — The access road between Frognal Lane and the first junction on the site feels very narrow for the proposed usage. Prohibit parking on access roads. Move the foul water pumping station further away from the road. This will create options if the road needs to be changed at a later date.
- 4.24. **Road junction** — The design of the junction at the entrance to the site, (Indicated in red, below) needs reviewing. Is a roundabout required? Consideration should be made for when the wider site (covered by policy MU4) is at full capacity. An estimated 3000+ vehicles will use the site each day.



- 4.25. **Number & type of vehicles** — There is considerable concern about the total number/type of vehicles that will use the wider site (covered by policy MU4). What are the estimated numbers/types of vehicles at each stage of the development (for the area covered by policy MU4)? This should include vehicles for dwellings, service vehicles, visitors to dwellings, traffic for the sports facilities, delivery vehicle traffic to/from the commercial units, staff/customers to/from commercial units, construction & earth movement vehicles for later phases.

- 4.26. **Prevent unauthorised vehicles** — Protection is required to prevent unauthorised vehicles (e.g. cars or motorbikes etc) from driving on the sports fields, for example by using (a) wood bollards (b) dense planting around perimeter.
- 4.27. **Community car sharing** — Promote the use of community car sharing clubs (eg ZipCar). Are there spaces allocated for community hire cars?
- 4.28. **EV charging for visitors** — Where do visitors charge their EV vehicles?

Homes and Buildings

- 4.29. **Create places not just houses** — The 'building better, building beautiful' commission headed by Nicholas Boys Smith had a number of recommendations. The section entitled 'Neighbourhoods: create places not just houses' is of particular interest:

'Every sector of the industry has told us ... that overly car-dominated places tend to be less attractive or popular places in which to spend time. We have seen some excellent work on how highway design can help reclaim streets for people ... supporting more humane and popular places. This now needs to become the norm, not the exception.'

Source: <https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission>).

- 4.30. **Layout** — The Accommodation Zone design layout feels highly concentrated with few free/green spaces. The design is dominated by roads and parking. There are no clear meaningful focal points or destinations within the accommodation zone. There is an opportunity to change the design focus from cars to people. Enhance the design with clear focal points and prioritise walking routes across the site and beyond to other areas in the local area.
- 4.31. **Overlooking** — The proposed new houses will overlook properties on Frognaal Gardens. The proposed houses in this location are two story houses. The existing dwellings on Frognaal Gardens are bungalows. There is a slight offset (reduction) in ground height. A cross section elevation drawing is required to understand the potential issue on all four sides of the perimeter of the site.
- 4.32. **Bungalows** — Consideration should be given to include bungalows in the mix of different types of housing.
- 4.33. **Trees** — NPPF (Dec 2023), para 136, highlights the importance of trees. Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change ... decisions should ensure new streets are tree-lined.

- 4.34. **Acoustics** — The dense accommodation design, with few natural barriers (eg trees at garden fences etc) will mean that sound will rebound off adjacent buildings.
- 4.35. **Access to the rear of accommodation buildings** — The dense accommodation plan design has very limited access to the rear of the accommodation/housing. This will mean that future changes / repairs / maintenance will have limited access. How would a 6m scaffolding pole and boards be taken to the rear of the property?
- 4.36. **Air quality** — There is significant concern over air quality and the local AQMA. Planning conditions are required to: Ensure real time air quality monitoring station on the roundabout (on access road to site) and run the service from commencement of the construction phase and continue for 3 years after the housing and the commercial areas are delivered.
- 4.37. **Street lights** — Permanent lighting should not impact the night sky or neighbouring residents. To enhance well being, street lights should create a warm glow with a colour temperature of c2700K.
- 4.38. **Light pollution** — A recent large-scale commercial development on the London Road, Teynham (adjacent to the proposed site covered in this application) highlights the need for careful lighting design to prevent light pollution. In this example, significant light pollution illuminates the night sky and up to 1km in the local area.



Image (above) taken from Frogal Lane looking southwest towards the A2 London Road, Teynham.

- 4.39. **Bins (Household)** — Consideration should be given to provide ample space for household bins. Most households currently have 3 bins (general rubbish, recycling, garden waste) and a food caddy.

- 4.40. **Topographical/earthworks** — The earthworks and ground levels need to be reviewed with care, particularly at the edges of the development site. Reason: to ensure that there are no sharp changes of ground height, or to ensure planned works do not undermine structures of neighbouring properties.
- 4.41. **Fencing near orchard/allotments** — Will the community area, including Orchard and allotments area, be fenced off? There is a real risk that dog walkers/children playing in this area will be able to run into the access road.
- 4.42. **Japanese Knotweed** — Knotweed has been historically identified at the former orchard at the top of Station Road. Has this site been checked?

Lifespan

- 4.43. **S106 Deed of Agreement** — The present S.106 agreement is out of date. Teynham PC was not party to the original discussion, but is mentioned within the agreement. The S106 Deed of Agreement describes a leasehold arrangement for 25 years at peppercorn rent. For the community facilities. The transfer of land ownership will be required at a later stage for adoption for the benefit of current and future generations. Clarity is required on services which are no longer present within the village for example Belle Friday Centre.
- 4.44. **S106 Bus service** — Include a fully funded local bus service for a minimum of 5 years. This would encourage many residents to use public transport and make the move from private car ownership.
- 4.45. **Ponds (soakaway)** — Specific information required on long term ownership, maintenance and funding for the ponds (water soakaway) is required.
- 4.46. **Community ownership** — The community facilities including football pitches, pavilion and car parking are welcomed. The S106 Deed of Agreement describes a leasehold arrangement for 25 years at peppercorn rent. The transfer of land ownership will be required at a later stage for adoption for the benefit of current and future generations.
- 4.47. **Open spaces** — The open community spaces of the allotments and the orchard are a welcomed addition to the development. The S106 Deed of Agreement describes a leasehold arrangement for the allotments for 25 years at peppercorn rent. The transfer of land ownership will be required at a later stage for adoption for the benefit of current and future generations.