

Dear Neighbours and Residents,

1st September 2021

An important update on the Draft Local Plan.

It appears that Swale Borough Council (SBC) plans to draw a line under the **Reg19** Local Plan Review and will instead put forward their proposed timetable for a relaunch of the Local Plan under Regulation 18. The Local Plan Panel meets on **8th September 2021** to approve their plan to be set before the Council. There are ten documents setting out the landscape for the proposed Reg18 process and their 'take home messages' from the Reg19 Consultation.

<https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=3580>

For now, if the Local Plan Panel approves these documents to go to the Council and the Council approves the LPP papers for action, the formal **Reg18** Public Consultation is planned to **start in October 2021**, the final Revised Local Plan will conclude sometime in 2022.

Should we be hanging out the bunting? No, I don't think so. There is a serious amount of work facing both SBC and Residents as consultation starts again leading to the Revised Draft Local Plan. The threat of Teynham Area of Opportunity (TAO) remains hanging over us until we see the documentation that reflects SBC's thoughts and plans for public consultation. We have to wait to understand which Options and Issues are promoted by SBC. Perhaps supported by a robust and timely programme of public engagement from SBC that I am sure would be welcomed by all.

SBC found itself stuck between a flawed Local Plan/Consultation that was at very real risk of failure if it went to the Government Inspector and Secretary of State unchanged. In that scenario, Quinn Estates would be facing an open goal with their Highsted Park (Science Park and West Teynham) proposal for 9,250 new homes because SBC might have faced a world without a Local Plan (the one that still exists could run out before the Reg19 Local Plan came into force). From SBC's perspective, that outcome would be intolerable.

By restarting the process, hopefully without the TAO embedded in the DNA of the Local Plan, SBC can declare that there is a credible Local Plan in progress and mothball Quinn's proposal as "premature". The term "prematurity" can be applied by local authorities to declare that their Local Plan process makes any opportunistic proposals inappropriate, undemocratic and damaging to rational planning. This option is embedded in the National Planning Policy Framework and supporting Guidelines. It also allows SBC to sidestep Quinn's threat of Judicial Review of the Reg19 Local Plan process by 'making a clean slate' of the process. It is difficult for Quinn Estates to challenge a Local Plan Review that follows a robust pathway that was lacking in the earlier Reg19 process.

So, where does that leave us? I believe SBC has made the only logical decision by bringing forward the Reg18 Review months before it would otherwise happen if they had stuck with the Reg19 process and been told at a much later date to go back to Reg18.

It strikes me that there are two distinct threads that may become clearer as we learn more from SBC.

On the one hand, the people who objected to TAO under Reg19 will want to see its removal in any new consultation documentation and we will need to stand ready with the arguments that showed how inappropriate the TAO Masterplan/SPG approach is.

The channels (social media, emails, websites, Parish Council and public/residential resources and more, established during Reg19) will have to be dusted off if TAO is embedded into the Local Plan as a preferred option of SBC. We must wait to learn which way SBC will jump. Of course, it remains an

option for SBC to walk away from TAO using the same arguments of popular objection used when SBC walked away from Garden Communities in the earlier Draft Revised Local Plan. The numbers arguing against TAO were stronger than those against Garden Communities in the earlier Reg18 process. Such a move would carry no shame; it would be democratic.

On the other hand, Quinn may **not** go away – and this is where the important initiative led by Paul Townson, supported by a number of Residents from our Ward, needs to be followed and supported to challenge Quinn’s “Teynham West” proposal. <http://land-west-of-teynham.co.uk/> and <https://www.facebook.com/land.west.of.teynham>.

A word of caution - there is a threat of overlap between the Local Plan Review and Quinn’s proposal that will seriously damage Teynham, Greenstreet and the Lynsted with Kingsdown Parish Fruit Belt (Best Most Versatile agricultural land).

- Were SBC to favour a Local Plan Option that contains TAO in any form, everything we have argued against in Reg19 Review would threaten to return and destroy the identity of Teynham and Lynsted with Kingsdown Ward. A major bypass with additional housing concreting over our food-basket. More air and noise pollution, through roads chopping up Teynham village into islands surrounded by noise, disturbance and loss of quiet streets/cul-de-sacs and enjoyment of being part of a village. A future as a community of zebra and pelican crossings and no heart. In that case, we shall have to fight our corner again.
- Were Quinn’s to win, Teynham, Greenstreet and Lynsted with Kingsdown would be an extension of Sittingbourne via Bapchild, spreading south to the M2, destroying many more rural communities and sterilising hundreds of acres once used to feed us. My fear is that the inevitable increased traffic using the A2 from Highsted Park may strengthen the argument for a bypass here and around Ospringe to cope. The traffic-management argument for spreading the load of traffic through the heart of Teynham village (once Gladmans has developed the Froggnal Lane development) will return and “son of TAO” will have happened even if it isn’t mentioned in the Local Plan.

As of today, we simply don’t know whether TAO is any part of the proposed Consultation (Reg18) “Issues and Options” paper that SBC will publish in October. It is my belief that we need can keep the identity of our communities that we love and the agricultural food-basket of the Kent Fruit Belt. The importance of this line of defence will become ever-more important as global populations increase and food production at home will be increasingly essential both to feeding us and for its value in capturing and storing carbon that will help us meet our climate-change challenges. If we lose our Best Most Versatile land on our watch, we condemn those who follow us to wondering how we could be so irrational.

Another ‘unknown’ at this stage is whether SBC will be following Secretary of State Robert Jenrick’s letter of guidance written to one of our residents that **SBC can legitimately argue for lower housing targets based on need and deliverability**. That decision will be for SBC to call.

For now, all we can do is wait to see where SBC wants to take us. I hope you won’t mind me rehearsing thoughts in this way while we wait. Who knows, the strength of opposition to TAO may have helped point SBC in another direction. I truly hope so.

Kind regards,

Nigel Heriz-Smith