

Dear Neighbours and Residents,

You will want to be aware.

On Tuesday 19th January 2021 (tomorrow!), Councillor Mike Baldock and SBC Officials will ask SBC Councillors to approve a “Pre-Submission Document (Regulation 19)” together with associated documents that will form the basis of the Revised Borough Plan to 2031. The main document is incomplete in some areas but its main thrust is clear and despicable on many levels. Those of us living in and around Teynham Village/Greenstreet/A2 will bear the brunt of either a monumentally stupid approach or a huge gamble by SBC officials and key Councillors where the only losers will be Teynham and Lynsted Ward. And yet, as I understand it NEITHER of our Councillors has been allowed access to this thinking and will have little if any say during a Council Meeting that will follow previous patterns of stifling democratic or representative debate on major policies like this one.

POLICY SETTING

The *Government has signalled changes in their calculation (algorithms) of housing numbers and distribution away from the South East* and into areas of investment to the north of London! There is also emerging evidence (Office of National Statistics) that original calculations of housing need will have changed because of more flexible working patterns, growth of on-line business and the loss of 1.3m Europeans in the UK (the biggest decline in our population since WW2) – all because of Covid and Brexit. I see no evidence that SBC is responding to these seismic shifts in our socio-economic demands. Instead, SBC is continuing regardless.

THE THREATS

Trash the earlier public consultation. SBC Councillor Baldock and SBC Officials have overturned ALL the five Options that were originally *publicly consulted on* for the development of a Revised Borough Plan to 2031. On Tuesday, SBC Council is being asked to approve an early draft Borough Plan that aims to replace the distribution of new homes across the Borough and away from the A2 choke-points evidenced by the AQMA in Sittingbourne, Teynham/Lynsted and Ospringe.

Introduce an indefensible “Teynham Area of Opportunity” to bamboozle the Planning Inspectorate in the matter of Additional Housing Targets.

SBC has introduced an idea they call **“Teynham Area of Opportunity”** [Policy AO1] based on 1,100 new homes – that is a 47% increase in homes across the whole Teynham and Lynsted Ward that currently (2011 Census) contains 2,327 homes; 1,100 **new** homes would represent a 47% increase. Most of this will be achieved by urbanising spread to the north of the A2 to the west of Teynham together with approval of development to the south of the A2 as part of an idea that pollution can be avoided by a **“Teynham Bypass”**. This idea flies in the face of conclusions in the Lynsted Parish Design Statement that Lynsted Parish historical evolution is dominated by rich agricultural land leading to a pattern of developing only one-building-deep. Indeed, it appears that SBC are so ill informed about parish boundaries that they are taking away the heritage and greatest part of the population of Lynsted that have been subsumed into Teynham. SBC have themselves argued how important this one-building-deep principle is for the *Village* of Lynsted but conveniently ignores it on the northern Parish boundary because they want a “bypass”. This is pure hypocrisy and an example of potential maladministration of the planning rules and National Planning Policy Framework and Guidance regarding loss of valuable agricultural land and protection against pollution (defined as PM2.5, PM10, NOx, Ammonia, and Volatile Organic Compounds). Remember, SBC have always downplayed and tried to ignore the importance of PM2.5 (particulate matter) in our AQMA when

the ENTIRE National debate focuses on PM2.5 which comes primarily from combustion and friction (brakes and road/tyre wear) alongside woodburning soot coming from the use of unseasoned logs and inefficient burners.

Important Local Countryside Gaps

What a lovely and cuddly “policy” this seems to be! This idea is far from being a policy based on evidence to define its boundaries. Declaration of ‘Green Spaces’ is being based on “**what is left**” if SBC can get away with its misguided policy to dump on Teynham and Lynsted populations.

I believe this strategy only makes sense ***if it is an SBC gamble with our health*** that will ultimately die a death once a Study has been concluded ‘sometime in the future’. Is this Study promised in the hope that it will fail? So, why propose it and gamble with our health *against all legal and policy directives from central policy-makers??* Is it possible that we are being used in a colossal and politically naïve gamble? SBC will do anything to avoid a confrontation with the Planning Inspectorate over the additional homes imposed centrally?

In short, SBC are hanging Teynham and Lynsted ‘out to dry’ to keep control of the emerging Revised Borough Plan to 2031. They can only do this if they approve the development to the south of the A2 for the weird interpretation of a “bypass” that is pure fantasy and will do great harm to us all.

My most immediate fear is that SBC will approve development south of the A2 in Lynsted Parish as a ‘sacrificial lamb’ to convince the Planning Inspectorate (and Swale Councillors) that SBC is serious in promoting this “Teynham Area of Opportunity”.

This crazy attempt to avoid the Planning Inspectorate scrutiny is childish in its conception (if true). Personally, I believe SBC’s misguided strategy should be highlighted with the Planning Inspectorate who, it must be remembered, recently overturned development plans to poison residents of Newington AQMA.

AQMA5 and its sisters in Sittingbourne and Ospringe

Let’s examine how SBC’s ‘policy’ approach to pollution will be impacted by this draft planning document.

SBC accepts that 1,100 homes (a 47% increase on existing household numbers) will increase the concentration of pollution along the A2 in addition to the new homes already progressing in Bapchild and Ospringe. It doesn’t matter which way you cut the maths – this will inflict a Cumulative Pollution Burden in contravention of the National Planning Policy Framework and Guidance. SBC will do this by ignoring the particulate matter increases by not measuring it in all the AQMAs!

So, how does SBC pretend it will “mitigate” the polluting impact of 1,100 new homes? Supposedly “bypassing” Greenstreet by channelling traffic through the new developments to the south of the A2. But that traffic would still be adjacent to our homes along the A2 and continue to directly impact Teynham Village – Particulate Matter is especially persistent by suspension in the air and recirculation by disturbance of further traffic. The prevailing winds are from the south-west so those living in AQMA5 will still get the pollution but in addition will also get it from the proposed bypass. If the “bypass” is extended through Cellar Hill, SBC would be driving a wedge between Lynsted Parishioners and the principal village, their school and preschool, their church, their pub, and their families.

SBC appear to prejudge the bypass option by declaring a need to upgrade the junctions of Station Road, Lynsted Lane and Claxfield Lane. A roundabout at Claxfield Lane will slow traffic through

Greenstreet as traffic will have to give way to the 1,000 new homes to the north; traffic control at Lynsted Lane will not overcome the congestion issues that currently define AQMA5; Station Road roundabout or traffic lights will further stifle free flow of traffic. Does this matter? It does if you want to REDUCE PM2.5 pollution from combustion of crawling and stop-start traffic and friction particles from brakes, tyres and road surfaces. Emergency Services are almost certain to object as the A2 has become a normal emergency route serving Sittingbourne, Teynham and Faversham access to emergency travel.

If SBC are going this route, 245 new homes will be built to the south of the A2 and a pretend “bypass” will be its unifying characteristic. The remaining 890 new homes and their traffic will sit to the north - If they want either Faversham or Sittingbourne they will turn right or left at Claxfield roundabout. So, for the price of approving the smaller development of 245 homes to the south of Greenstreet, we are ALL going to suffer cumulative pollution impacts from the SBC proposal. “Teynham Area of Opportunity” starts to feel like “Teynham Area of Negligence”. SBC will, of course, point to their ‘policy’ of Green Spaces which is no better than a redrawing of lines AFTER the policy of build, build, build, has been satisfied. That is no definition of “policy” that I recognise – and central government policy advice is something I am well versed in through my professional career.

In short, this document is implausible, undemocratic, misguided, ill-informed and transparently ridiculous. The problem is these proposals are being made in ‘our name’ and it is our health and well-being that is being threatened.

While I am here

- Putting 1,100 new homes where GPs cannot be recruited (GP Surgeries are joining forces in networks or expansion in our Swales two towns on the mainland). It is simply not good enough to declare building GP space will lead to GPs filling that space.
- SBC has declared Teynham is suited to 47% more homes because it is close to a railway station. I think most of us know that is simple-minded. We have lost frequency of services and fewer ‘fast’ trains to either London or Canterbury/Dover.
- A new cycle-way to the north of Teynham with ‘crossings’ every now and again along the A2 between Sittingbourne and Faversham. Please can we put this nonsense to bed now? The number of cycling journeys undertaken is vanishingly small when compared with all other modes of transport. Cycling has shown promise as a leisure activity but not as a means of getting children to school, shopping, going to/from work in all weathers – a bicycle carries one person, a car can carry two/four people, a bus can clear five cars from the road (but KCC policies on pricing OAP access to busses (free) makes the bus companies job almost impossible to support). Trains, if they stopped in Teynham, carry yet more. Those that currently cycle along the A2 are in direct competition with pedestrians because it is not safe to ride on the road. Injuries/deaths involving cyclists in rural lanes is high too. Stop being romantic and take a long hard look at how most of us live our lives not some Walt Disney reimagining of Life.
- KCC has made it clear that they object to the introduction of large numbers of houses along this part of the A2 as the infrastructure cannot support it. They have further pointed to the actual natural behaviour of residents in the **real world** rather than some statistical model that can only ever be a guide.
- Another idea promoted by SBC is to remove parked cars from the A2 by incorporating ‘adequate’ (in a cycling strategy?) parking in new developments. This idea was rejected by

KCC when developers argued for moving cars from Lynsted Lane. People in the real world do not behave in that way.

- I doubt the emergency services will welcome
 - further “traffic management” by lights and/or roundabouts; and
 - pressure of traffic through a ‘diversion’ through a new estate.

What Councillor Baldock and SBC Officials have concocted is monumentally stupid, indefensible, and politically naïve/misguided. Whoever is behind the emergence of this “novel approach” needs to get their attention back to reality and return us all to sanity. I feel strongly that this madcap behaviour is so transparently a smokescreen and simply wrong that it should be drawn early to the attention of KCC Authorities, the Administrative Ombudsman as well as the Planning Inspectorate (who will not be placed well to understand that this “Area of Opportunity” idea is a smokescreen without local input).

SBC Council must surely see through the fogged position of the Planning Committee and Officials. SBC Council should apply a cold-shower to the posturing contained in this dangerous document and return us to a discussion of the five options that were publicly consulted upon. Back to the drawing-board – perhaps with more transparency and public, democratic involvement. Publishing the document two working days before the Council Meeting is a cynical ploy at best.

Nigel Heriz-Smith

This is the link: the main document is 151Mb – download as a PDF with this link:

<https://services.swale.gov.uk/meetings/documents/s16442/Appendix%20i%20LPR%20draft%20for%20LPP%2019.01.21.pdf>

To view all twelve documents:-

<https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=2423&fbclid=IwAR1MTG4U0SvrWG7OUczT41v9krXFz5ZWjYkYfmQY5A7vHiFuuWeawvJ3E9Q>