

Paragraph 5.5.40 to 5.5.43 – Non-Sustainability of Teynham Area of Opportunity and damage caused through pollution

These comments apply to four paragraphs: paragraphs 5.5.40, 5.5.41, 5.5.42 and 5.5.43. The Local Plan Panel has promoted the Teynham Area of Opportunity (TAO) in the Local Plan to include 1,100 new homes on top of existing allocations (“Bearing Fruits” Local Plan) – existing allocations already amount to 1,330 between Ospringe (AQMA6) and East Street (AQMA 3).

In this paragraph, the heading “Issues and Constraints”, skims over the disastrous consequences for the place and problems facing Teynham Parish (TP) and Lynsted with Kingsdown Parish (LKP). No surprise that SBC has gone “silent” on the numbers. They fail to make any attempt to quantify or model:

- the impact of these constraints today;
- the cumulative impact (traffic and pollution) of existing A2 allocations once they are ‘built out’; and
- the cumulative impact under the proposed further addition of 1,100 homes (and wider allocations further along the A2).

So, I offer here the missing analysis (using SBC figures).

The only result of building the existing 1,330 allocations in Ospringe, Teynham and Bapchild (Bearing Fruits) and the proposed addition of 1,100 homes allocated in the TAO is to generate an estimated 4,250 more cars and vans (based on Department of Transport multipliers). This amounts to more than 8,500 new traffic movements with yet more traffic from commercial vehicles servicing those communities and 25-year extraction of brickearth permitted from Barrow Green Farmland.

Six AQMAs along the A2 between Newington and Ospringe, confirm the message from KCC Highways that the A2 today operates beyond its “service rate”. If TAO remains in this Local Plan, 14,000 daily vehicles (Department of Transport count – <http://aqma5.co.uk/Traffic Flow A249 to M2.html#id56095>) between Ospringe and Sittingbourne will rise to a conservatively estimated total of 22,500 vehicle movements daily. That represents a 60% uplift in traffic and corresponding congestion and gridlock at Ospringe, Teynham and Sittingbourne (potentially in Faversham too). These estimates are

“conservative” because the Local Plan contains further allocations along the A2 that will contribute further pressure along the A2.

My impact assessment does not attempt to quantify the additional burden from **M2 roadworks and accidents** that regularly divert traffic along the A2. **Emergency vehicles** will experience degraded response times across this part of Kent as they habitually use the A2 for emergency transit (including our own voluntary Fire Station) and in response to M2 emergencies. The failure by SBC to undertake any detailed modelling of traffic is scandalous.

TEYNHAM ACCESS TO MAJOR A&E HOSPITALS (indicative travel time and distance for emergency patients, outpatients, or visitors)					
	QEQM (Margate)	Kent and Canterbury	William Harvey (Ashford)	Medway (Gillingham)	Maidstone (Barming)
Principal transport modes to/from Teynham Village					
Car	41 min/ 28.3miles	24 min/ 14.1 miles	31 min/ 17.7 miles	33 min/ 15.7 miles	32 min/ 18 miles
Train	76-121 minutes; 4 changes in transit	37-46 minutes; 3 changes in transit	113-144 minutes; 5-6 changes in transit	58+ minutes; 2 changes in transit	110-120 minutes; 4 changes in transit
Bus	121 minutes; 4 changes in transit	63-66 minutes; 4 changes in transit	120-152 minutes; 5-6 changes in transit	43-52 minutes; 4 changes in transit	80-95 minutes; 6 changes in transit

Transit by ambulance is highly reliant on congestion & travel times to the injured party.

Transit by public transport options are

- extremely limited if you have an appointment early in the morning.
- highly reliant on synchronised changes in transit
- vulnerable to adverse weather conditions
- space being available (especially on buses at peak times)

It doesn't take an Alan Turing or Marie Curie to work out that significant costs and severe damage will arise through congestion, degraded road safety, and the full menu of harmful pollutants. To cap it all, SBC only measures NO2 in Teynham, while established research and studies have led Government Policy, EU and WHO bodies to all agree that the greater harm comes from Particulate Matter at 2.5 microns (PM2.5). By the roadside, these are mainly friction particles with deadly payloads of

chemical, mineral and sooty composites penetrating and accumulating deeply into the organs of those living and working with that passing and idling traffic, day in and day out.

The monstrous SBC notion of “mitigation through a bypass” tied to disproportionate development allocations under the TAO, simply accommodates a greater concentration of pollution across a wider swathe of dwellings and communities (north and south). A local citizen science project demonstrates through continuous and mobile measurement that harmful levels of pollution experienced at the A2 in AQMA5 can be measured in the same “band” of harmful pollution as much as one kilometre away from the AQMA. The data is not perfect (leasing a Defra approved continuous reference monitor is beyond my resources and those of the Parish Council).

SBC Officials vetoed funding for a modest project (£5,000) for Lynsted with Kingsdown Parish Council this year (2021), delivered independently by Canterbury University consultants. This project was an attempt to engage a wider range of local residents in a larger “citizen science” project to raise awareness and to help quantify all harmful pollutants through continuous monitoring. SBC stubbornly relies on dispersion tube data that is notoriously inaccurate for just NO2 over one month/year. SBC Officials’ suppression of meaningful data was made worse as one of their grounds for rejection was the absence of the latest Annual Report – which they had omitted to place on their website until the day the application went in to the Eastern Area Committee! This is just another example of how dysfunctional our Council is and how chaotic the thinking is at the heart of Swale Borough Council, driven by myopic Councillors who are determined to dump additional housing in perhaps the worst possible place in the whole Borough!

If **ANY** new homes, above the “Bearing Fruits” allocation, are permitted along this stretch of the A2, the harms experienced will escalate disproportionately as “queuing theory” demonstrates that frequency and duration of congestion and gridlock occur very suddenly with only modest changes in traffic reaching a tipping point in the “service rate” of the built-up parts of the A2. We already see regular episodes.

Additional costs will be borne by local businesses through congested traffic, even more traffic will adopt ‘rat runs’ through our narrow rural lanes

SBC has promoted an idea of TAO without traffic modelling, without pollution modelling, without involving KCC Highways. **This is nothing short of negligence towards the health and wellbeing of those trapped “at the heart of the Borough.”** SBC has no business adding ANY new housing between Sittingbourne and Ospringe if it is to achieve its direct and exclusive responsibilities under National Planning Policy Framework (NPPF) and Guidance to avoid “cumulative impact” of new homes on existing AQMAs. What we are talking about is a minimum of 60% uplift in traffic. A bypass that will attract more traffic and feed it into the A2 through Ospringe and Sittingbourne is not a solution to traffic levels, “service rate” of the A2, or pollution harms across all four severe harms recognised by Government policy but ignored by SBC. The idea of a bypass is a lie that will harm thousands of residents (especially children, the aged and those suffering chronic illness of every description).

SBC’s argument supporting the ‘benefit of centrality in the Borough’ is barking mad. Their plans for “Teynham” is nothing less than inventing a slurry pit of cumulative harms for new and old households, visitors and workers in that space.

Our major service centres, Sittingbourne and Faversham, are too far distant for realistic modal shift to “active transport” along a road that is dangerously fast in open stretches and dangerously narrow and congested in built-up communities – cyclists have been killed in both Teynham and Bapchild in relatively recent times. How does 60% more traffic accommodate “active travel”. The Government recognises that “active travel” options are most likely to be achieved in and around urban centres, not rural communities set back along narrow, enclosed, winding and often poorly maintained lanes.

The infrequency of bus and rail services does not lend itself to meet the complex needs of modern rural households that have the highest car ownership: to manage the balance demands of secondary school-runs, weekly food shopping, access to employment, commuting further afield from stations with safely-lit car parks and more frequent fast services, access to health services (we are soon to lose our only remaining GP Surgery; access to Cottage Hospitals in both towns; therapists, etc), entertainment, variety of retail, banks, etc.

The seriousness of the predicament facing “Teynham” is illustrated by the ‘live’ opportunistic (outside the current Local Plan) development

proposal for just 86 homes immediately south of the A2 off Lynsted Lane. KCC Highways has recommended rejection (three times) on several grounds of pedestrian safety, health, highly constricted rural feeder lanes, poor junctions (within AQMA5), and **worsening congestion along the A2 through Greenstreet that already frequently exceeds its capacity (or “service rate”)**. KCC Highways are troubled by the existing “Bearing Fruits” allocations amounting to 1,330 new homes at Bapchild (600 homes), Teynham (430 homes plus 26,840sqm commercial/light industrial space), and Ospringe (300 homes). They have come down clearly against ANY further growth in housing in the Teynham/Lynsted area.

A serious additional pressure on the A2 is the agreed (by KCC) 25-year supply of brickearth (760,000 tons total or 30,400 tons every year) on Barrow Green Farm immediately east of Teynham.

Paragraph 5.5.43 makes a brave attempt to suggest the facilities of Teynham can be turned on at will and at scale. There is no evidence that this is possible. See my response to **Paragraph 5.5.30** listing the evidence of erosion in sustainability measures.

I strongly believe that the TAO and Policy AO1 are inherently “unsound” and should be removed. There is no discernible planning or place-making benefit arising from any further allocations between Ospringe and Sittingbourne.