

## Area of Opportunity. (Paragraphs 5.5.44 to 5.5.49)

### Paragraph 5.5.44 – The arbitrary assertions surrounding accessibility without foundation.

Teynham is presented as favourable place to expand housing based on:

- **centrality** – this heroic assumption is “Teynham’s” greatest weakness (see my comments at 5.5.40-5.5.43).
- **rail access** – trains are hourly, require changes for commuting journeys and none are ‘fast’. Southern Rail tells us the line is at capacity (in terms of signalling and rolling stock). There are six parking spaces. More frequent fast services are available at Sittingbourne and Faversham, covered platforms, refreshments, lit and monitored car park.
- **Position along the A2** – which translates into the following mix of traffic. **Department of Transport (DoT)** data reveals the volume and pattern of vehicles between the three adjacent AQMAS remains constant. The manual DfT count at No.108 London Road, 2019, confirms the following distribution of vehicles that SBC say they can be mitigated through “active travel” and a bypass without the necessary traffic modelling or simple application of common sense:-

<i>Department for Transport</i>		Vehicle Counts	
		2019	Projected
	Share	14000	22500
Pedal cycles	0.001	19	31
Two wheeled motor vehicles	0.163	2,275	3,656
<i>Cars and taxis</i>	<i>0.789</i>	<i>11,045</i>	<i>17,751</i>
Buses & Coaches	0.006	84	135
Light Goods Vehicles	0.008	106	170
All HGVs	0.043	603	969

Rural Communities rely on car ownership to reach the key services and employment needed in modern living.

[Table uploaded as an image – proportion of transport use according to community type/size – Source DoT and Defra].

Proportion of average trips per person per year, by mode and settlement type, in England, 2018/19

	Percentage						
	Walk	Car/van driver	Car / van passenger	Local bus	Rail	Other	All modes
Urban Conurbation	28	33	19	8	7	5	100
Urban City and Town	28	42	22	3	2	4	100
Rural Town and Fringe	25	45	23	3	1	3	100
Rural Village, Hamlet and Isolated Dwelling	15	54	24	2	1	3	100
England	26	40	21	5	3	4	100

Source: DfT National Travel Survey [Table NTS9903](#)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/973003/02\\_Statistical\\_Digest\\_of\\_Rural\\_England\\_2021\\_March\\_edition.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/973003/02_Statistical_Digest_of_Rural_England_2021_March_edition.pdf)

The Government’s own advice to Local Authorities and “Active Travel” points out that rural communities are less suited to active travel than towns and cities. Laughably, that briefing document does suggest getting buses to accept bicycles on board.... That does not stack up to a ‘modal shift’ as defined by SBC to remove a noticeable part of the 22,500 daily vehicles traversing the space between Sittingbourne and Faversham!

(p19) “People living in rural areas and villages may find it as hard to be physically active as people in towns and cities. Difficulties in safely accessing many services by walking, cycling, or by public transport, can pose a real challenge in some rural areas.

A lack of pavements or cycle ways on busy rural roads can discourage use of these travel modes even when moving between towns and settlements not too far apart.”

Source:

[http://aqma5.co.uk/assets/Local\\_Plan\\_2020/Working\\_Together\\_to\\_Promote\\_Active\\_Travel\\_A\\_briefing\\_for\\_local\\_authorities.pdf](http://aqma5.co.uk/assets/Local_Plan_2020/Working_Together_to_Promote_Active_Travel_A_briefing_for_local_authorities.pdf)

- **Existing facilities** – these have progressively eroded over time and are far from adequate for current need. This assertion by SBC flies in the face of demonstrable facts and data describing rural reliance on cars to meet the needs of modern rural life. (**see my comments at paragraph 5.5.30**).
- **Evidence Base – derived at a later date through a “master plan”**. This statement is pure hypocrisy by SBC who have abused the SPG device to avoid robust evidence at Reg19 Stage. Thus burdening “Teynham” with development allocations in the Local Plan by

means of creating “facts on the ground”. Of course, the whole Local Plan lacks the full evidence-base at the time of “Consultation”. This renders this Regulation 19 Consultation invalid as we are being asked to comment on “soundness” without access to the evidence supporting it! This is barking mad.

I believe I have already demonstrated that there is no sustainable argument in favour of either the Teynham Area of Opportunity (TAO) or alternative home-building at any scale (600 homes are threatened by the Chairman of the Local Plan Panel as an alternative to TAO without supporting evidence of need, sustainability or suitability if the TAO falls).

My responses to other TAO paragraphs have established that the TAO is unsupportable both in terms of its location, access to facilities and employment, destruction of BMV land, fracturing of sensitive rural communities, legal constraints (NPPF) governing the cumulative impact of pollution on health in AQMAs, traffic today stands at 14,000 vehicles daily (a figure that regularly exceeds the “service rate” for the A2 between Teynham and Newington) to a potential 22,500 vehicles daily between Ospringe and Sittingbourne.

A ‘live’ proposal for 86 homes off Lynsted Lane has been recommended for refusal on three occasions by KCC Highways and SBC Environment Officers.

***SBC’s thinking in relation to pollution in AQMA5 is chaotic.***

The latest SBC Air Quality Annual Status Report (2020) - [https://services.swale.gov.uk/assets/Air-Quality/Air-Quality-Annual-Status-Report-21-July-2020\\_edited%20\(002\).pdf](https://services.swale.gov.uk/assets/Air-Quality/Air-Quality-Annual-Status-Report-21-July-2020_edited%20(002).pdf) - argues that SBC will review AQMA5 based on two years of NO2 data using their highly inaccurate diffusion tube mean figures. They say (p9) “*we propose to review Teynham (AQMA 5), following no exceedances of the annual mean air quality standard for NO2 for two consecutive years*”. And yet, SBC defends its allocation of housing in TAO and its associated “mitigation” through a bypass by pointing to serious pollution concerns in AQMA5. They can’t have it both ways.

*The TAO bypass will not reduce pollution in AQMA5 for two reasons –*

1. The price of a ‘bypass to nowhere’ is an allocation of 1,100 homes over and above existing allocations (“Bearing Fruits”) leading to 22,500 vehicle movements daily once all the allocations are built-out. The

current (Department for Transport, 2019) daily figure is 14,000. That intensification of NO<sub>2</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> is an indictment of irrational policy-making by the Local Plan Panel and the Council.

The level of pollution measured at AQMA5 spreads (within the same band of pollution) for up to 1 kilometre north and south of the A2, depending on wind direction and strength. This has been demonstrated by CPRE in their Report (April 2021) - "Teynham Area of Opportunity - Air Quality Aspects. An analysis of Policy AO1"

[http://aqma5.co.uk/assets/Local Plan 2020/CPRE Air quality report - analysis of data.pdf](http://aqma5.co.uk/assets/Local%20Plan%202020/CPRE%20Air%20quality%20report%20-%20analysis%20of%20data.pdf)