

**Paragraph 5.5.45 – Defining the boundary of Teynham Area of Opportunity based on SHLAA bids rather than evidence-base, or modelling of pollution and traffic**

Regarding the boundary definition for the TAO, I refer to my submissions under **paragraphs 5.5.33** and **5.5.37**. It is perfectly clear from the available paperwork that the defined boundary has nothing to do with evidence, need or opportunity. The “allocation site boundaries” were included in the Local Plan version put forward by the Local Plan Panel on 19<sup>th</sup> January 2021 to the Extraordinary Council Meeting for their approval on 3<sup>rd</sup> February 2021 – leading to the unheralded official launch of the Reg 19 Consultation. SBC relies solely on the SHLAA Sites deemed to be “deliverable” giving a yield that looks suspiciously like the allocation for TAO contained in **Policy AO1**. This feature and Policy have been included in the Local Plan without pollution modelling nor traffic modelling and without KCC Highways involvement.

The inclusion of TAO and Policy AO1 in the Local Plan, if approved, would give a green light to 1,100 new homes (or more, according to SBC Officials speaking to LKPC Zoom Meeting).

Residents were not given notice of this threat and have struggled to get anything sensible out of SBC Councillors sitting on the Local Plan Panel who were determined to make ‘facts on the ground’ within six-weeks of the Council decision. SBC has abused the instrument of “Supplementary Planning Guidance” to make housing allocations that are subjected to a lesser test than is applied to any other kind of allocation. There can be no doubt that the quantum of 1,000 homes later amended to 1,100 home is an “allocation”. The uprating of allocations from 1,000 to 1,100 corresponds to a partial allocation from a 400 homes Site identified in the Transport Strategy. SBC has danced around its handbag trying to protect the TAO trying to deny this quantum is an allocation but unable to describe what its function is if not as an allocation. Frankly, “if it walks like a duck and quacks like a duck, it is a duck!”