

Paragraph 5.5.47 – Itemising the lack of evidence behind the Teynham Area of Opportunity but making heroic assumptions

Bullet 1: Transport modelling is not in place at the time of Reg19 Consultation and is promised here as an “Update” rather than a proper evidentiary modelling deemed necessary for the whole Local Plan of which the TAO and Policy AO1 are a part.

Bullet 2: Again, the TAO has emerged as an afterthought, otherwise SBC should have include both air quality and transport modelling relevant to the traffic impacts of both existing and proposed allocations. Taking all existing allocations between Sittingbourne (East Steet AQMA3) and Ospringe (AQMA6) together (1,330 homes) with the TAO allocation of an additional 1,100 homes (see comments on Paragraph 5.5.39), the TAO will place a crippling burden (14,000 daily vehicles (2019) to 22,500 daily vehicles through the Local Plan. The A2 is already operating beyond its “service rate” between Teynham and Newington (Source: KCC Highways response to opportunistic planning proposal for 86 new homes leading to Lynsted Lane.).

Bullet 3: This bullet is bulging with heroic assumptions! They “predicate” that TAO will rely on “**transport and mobility mitigation**” comprising changes to existing junctions (Lynsted Lane Junction is constrained by listed buildings on both corners and the dangerous absence of a footpath; Station Road and Frognal Lane are constrained by narrowness of road and footpaths.), bus prioritisation (undeliverable, given the narrowness of the A2 and competing domestic parking and commercial delivery demands; buses are also a declining feature of rural living given their infrequency, unreliability, pricing structures distorted by free bus passes for pensioners competing with paying customers on whom the burden of increased costs bear disproportionately).

Transport and mobility mitigation: This paragraph exhibits contempt inside SBC for the people of Teynham and the other two AQMAs. It is astonishing that SBC has included a major commitment of resources, including a de facto allocation of 1,100 or more homes, without any engagement with Statutory Consultees of the two Parish Councils and KCC Highways. This Local Plan has come to Reg19 without a coherent Transport Strategy “currently in development” but without KCC Highways!?

Bullets 4 and 5: In SBC thinking, TAO housing allocations depend implicitly on the delivery of a “Southern link route” which is a travesty of logic, evidence, planning policy and an abuse of the SPG instrument of planning. On top of the 1,100 homes already allocated to the TAO, we discover the bypass is also a step to “unlock development sites to the south of the village”. The alignment has not been considered and, typically for SBC, the impact from all harmful pollution is lost to SBC’s thinking. Please look at my comments under **paragraphs 33, 34, 35, 39, 40, 41, 42, 43, and 46!**

Bullet 6: “Connections to the north” defines the destruction of the identity and tranquillity of Teynham Village. The Local Plan Panel and Council are endorsing the idea of driving cross-traffic (east-west) through two existing cul-de-sacs (Donald Moor Avenue and Honeyball Walk) that are ill-suited to the burden of traffic, noise, pollution and poor lines of sight. If SBC had bothered to consult parish councils or residents, they would have benefitted from this local knowledge. The candidate cul-de-sacs run immediately alongside the Primary School and Community Hall, adding greater danger for residents, especially children who enjoy a degree of protection by the cul-de-sacs that our Police Authorities believe are safer environments than through-roads. Those two streams of cross-traffic would join Frogmal Lane to Station Road, crossing the attractive open space at the heart of Teynham Village into the existing new development of 107 homes (“Bearing Fruits” allocation), travelling further east across the pronounced “Lyn Valley ridgeline” that SBC seeks to protect in **paragraphs 34 and 35!** The raised edge of the Lyn Valley here grants easy public footpaths and uninterrupted views of the nearby Iron Age Barrow to the east that lends its name to Barrow Green today (<https://webapps.kent.gov.uk/KCC.ExploringKentsPast.Web.Sites.Public/SingleResult.aspx?uid=MKE3545>). This is a valuable, distinctive and very beautiful boundary to the east of Teynham Village that would be damaged by further development over the ridgeline and into the Lyn Valley to the east of Teynham village. Losing that connection with tranquil countryside solely in order to excuse developments that are damaging and completely out of scale with Teynham Village is a travesty.

It is ironic that an Administration that apparently prides itself on its ‘green’ credentials has no qualms when it comes to the destruction of

rural identity solely to dump more housing in about the worst place in Swale to add housing!

It is flabbergasting that SBC have not 'done the maths' (but I have at **paragraphs 40-43**) to demonstrate that any additional building on top of the 430 allocated to Teynham Village under "Bearing Fruits" Local Plan will be catastrophic for the rural setting and damaging to existing and new residents when viewed 'in the round' to include existing allocations at Ospringe (300 homes) and Bapchild (600 homes). These existing allocations have drawn criticism from KCC Highways at the Regulation 18 Stage and in response to an "off Plan" opportunistic application off Lynsted Lane – the A2 is now beyond its "service rate" within Teynham and between Teynham and Newington (my implication also Ospringe).