

Policy AO1 – Key Points

Undeliverable

- **Bypass: KCC Highways** has said on several occasions that the whole A2 between Teynham and Newington is overstretched and so no more developments should be approved on the A2 – of any size. Clearly stated in their comments against the proposal for 86 homes off Lynsted Lane. Also stated in the Meeting with SBC to discuss the Looking Ahead (Reg18) Consultation.
- **Dispersion of traffic through the centre of Teynham Village:** the village will lose tranquillity by the pushing of traffic through two existing cul-de-sacs, across Station Road and over the Lyn Valley edge that rises to the east of Teynham.
- **“Active Travel” is not suited to rural communities:** **Rural communities:** 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:** Public Health England)

Unjustified

- **SBC has no evidence to support the TAO Option:** no traffic modelling at all to support the Teynham Area of Opportunity; no pollution modelling to support the TAO allocation that injects about 5,000 new traffic movements through the TAO + 1,330 new homes already allocated in “Bearing Fruits” Local Plan. No support from KCC Highways through SBC’s pretence at a viable and deliverable Traffic Strategy.
- **Failure to justify the choice through an “Issues and Options” Consultation:** TAO is going to make “facts on the grounds” if it is allowed to remain in the Local Plan. We will be committed to 1,400 (at least) homes without any explanation through “options considered and explained”.
- **The boundary of the TAO is based entirely on ambitions of Developers:** who submitted Sites through the Call for Sites (SHLAA). SBC has effectively defined its ‘Green Boundaries’ by retrofitting the boundary without any attempt at justifying that boundary. In short, SBC “Policy” in this matter is a ‘policy of appeasement and surrender’ to developers and landowners leading to pushing an idea that will build homes as far away from the M2 and neighbouring towns as it is possible to do! “Central” to the Borough is actually its weakest feature!
- **Teynham as a Rural Local Service Centre is a misdirection as a justification for TAO:** For years the commercial centre of gravity in the TAO boundary has been in decline. All the evidence from central Government – **Defra’s** “Statistical Digest of Rural England” (updated regularly) makes it clear that modern living in rural villages and hamlets is highly dependent on car/van ownership – e.g. Town centres, Food stores, Hospitals, GPs, Further Education, Secondary education, Primary Schools, Places with 5,000+ jobs, Places with 500-4999 jobs, places with 100-499 jobs. The railway station is poorly served on frequency of services,

parking and will not be developed so close to mainline stations of Sittingbourne and Faversham that enjoy fast services, cover, cafés and well-lit safe car parks.

Against National Policy

- **Building on Best Most Versatile Land (BMV)**: National Planning Policy Framework (NPPF) clearly states that BMV Land should be avoided for development while less fertile land is available. Land south of the A2 is part of the Nationally significant Kent Fruit Belt defined by soil. This argues against any new allocations of Sites for house-building, and bypass/road building.
- **Cumulative impact of pollution in AQMAs**: CPRE has reported that the spread of pollution can remain at harmful levels up to 1 kilometre north and south of the AQMA5. The claim that a bypass will relieve pollution is simply not true. At the same time to increase households by an additional 1,100 that brings to total under the Local Plan to 2,430 homes leading to an increased daily traffic from 14,000 to an eye-watering 22,500! Such a decision is negligent and illegal as it is clear that 60% more traffic will increase pollution at three AQMAs – Ospringe (AQMA6), Greenstreet (AQMA5), and East Street/Sittingbourne.
Pollution at harmful levels continues to blight AQMA5 and will worsen under TAO; but is not being rigorously tested by SBC on a continuous basis and across the most serious harms arising from Particulate Matter (PM2.5 and PM10). This is a failure in duty of care specified by NPPF and a failure of inadequate scientific evidence-base.

Not Legally Compliant

- By moving directly from Regulation 18 (Looking Ahead) in 2018 to the final ‘Publication Stage’ at Regulation 19, SBC **has failed properly to consult** in a meaningful way to raise issues and compare Optional choices behind their final decision in favour of TAO. We were promised a Regulation 18b “Issues and Options” stage and this was removed without explanation nor justification.
- **Lack of transparency and lack of community involvement**: A policy of “passive discovery” of the workings and discussions taking place in Local Plan Panel and Full Council Meetings. If you haven’t been “actively” told that TAO is being developed, how would you know to look at a series of bureaucratic Minutes? SBC has operated secretly – they never thought they would be caught out, so they didn’t even prepare us by writing to us, preparing explanatory notes and online presentations. Only under pressure have they entered into Zoom meetings long after the “Consultation Period” of six weeks (now 12 weeks) was over!
- **Failure to engage with Statutory Consultees**: SBC failed to tell parish councils what they were planning for us; SBC has failed to tell KCC Highways that the TAO and its bypass were being planned. The first that anyone would have known about the TAO if they had not be “found out”, would be after SBC had established “facts on the ground” about 1,100 homes allocated, a bypass, and destruction of Teynham Village tranquility of cul-de-sacs!
- **Ineffective Communications Strategy**: TAO has had no place in SBC’s communications strategy.