

19/505036/OUT | Outline application for the erection of up to 86no. residential dwellings, including 50% affordable housing (Access being Sought), as amended by drawings received 28th May 2020. | Land South Of London Road Teynham Kent ME9 9QJ

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So, here we are again. The developers who want to build over greenfield, Grade 1 agricultural land that feeds onto Lynsted Lane have provided pretty pictures of a development that still increases the threat to our safety and additional damage to our health.

The utter folly and negligence of further approvals along the A2 and along Lynsted Lane is plain. The legal responsibility of SBC to protect the health of people in AQMAs against such developments has been repeatedly ignored by SBC in the past and may be compounded if these developments are not challenged.

\*\*\* OUR COMMUNITY HAS CERTAIN IMMOVEABLE CHARACTERISTICS.\*\*\*

Our geography alone makes a nonsense of the several proposed plots of land being offered up for development by landowners working with developers. The A2 is congested through all our AQMAs and our lanes are very rural (and regularly congested at junctions with the A2 and very poor lines of sight throughout their lengths).

Firstly, AQMA5 (and the other AQMAs) tells us that AS THINGS STAND the air we breathe is so polluted it is damaging our health.

My air-quality measurements from last year are the most honest representation of how serious the position is under NORMAL conditions throughout the year within AQMA5 and along the A2 in Lynsted/Teynham. Those measurements represent conditions **before** traffic was discouraged from using the A2 by a succession of major works in Faversham, Greenstreet (Teynham and Lynsted) and Bapchild. It is clear that the pollution is more dangerous than SBC's diffusion tubes (NOx only) tell us - even when they are put at the right height! SBC data is inevitably compromised.

Even with lower traffic levels with the road-works blockages and the Coronavirus (Covid-19) lock down we very rarely get air in the "LOW/Good" band. This shows how deeply embedded our problems are with levels of pollution under a wide range of conditions.

Of course, house building is already under way in Bapchild, Teynham and Ospringe and there are other plots **currently** approved by the Borough Plan (but not yet delivered - e.g. Froggnal Lane, Teynham; and Swanstree Avenue, Sittingbourne). Between West Faversham and Sittingbourne, we will suffer a "new normal" that has MORE traffic without ANY measures being possible to reduce pollution across all five of the AQMAs along the A2. Harmful pollution is experienced **daily** AT THE KERBSIDE and still harmful up to ONE KILOMETER on each side of the A2 depending on wind direction and speed. One caution, the pollution may spread **even further**, but my measurements have only been made along my jogging routes in search of healthy air.

CONCLUSION: Any SBC development approvals between West Faversham and Sittingbourne are worse than irresponsible. They are negligent of our health and fail the legal obligation of SBC NOT to make approvals that add to the burden of harm in existing AQMAs. By making the EXISTING approvals, SBC has shown itself in recent years to ignore the serious damage being done to its residents, visitors and workers along the A2, along a corridor that can stretch up to 1 kilometre north and south of the A2! SBC should be very much aware of "Client Earth's" legal actions already against many Planning Authorities for their failure properly to take into account this link between planning approvals and increasing pollution/harm in existing AQMAs - NPPF as revised is very clear. **"Mitigation"** such as planting a forest miles away would have absolutely NO IMPACT AT THE

KERBSIDE - this is where the concentration of pollution from combustion and friction is generated and experienced. Evidence has shown that **any** benefits from cleaner engines and electric vehicles is being offset by the rapid increase in numbers of large and heavier SUVs/MPVs that generate more friction particles because they weigh more! Even pure electric cars add to Particulate Matter at the most harmful size (PM2.5) because they are heavier! So, clever marketing by car manufacturers (favouring SUVs/MPVs) and the seductive measures of greener vehicles has had the unintended consequence of worsening the worst pollution in built-up areas where braking and acceleration is pronounced. The result, PM2.5 particles that gain easy access to our internal organs and accumulate there.

Secondly, Lynsted Lane is a nightmare along its WHOLE length but especially at its junction with the A2. This lane is dangerous because of its narrowness, poor lines of sight, residential needs for on-road parking. There is NOTHING that ANYONE can do to mitigate that truth. SBC has already been told by Maidstone that the character of Lynsted Lane and the impossibility of improving the junction makes development on Lynsted Lane unworkable. This position has not changed.

What HAS changed is there are ADDITIONAL PLOTS of land being offered up on the other side of Lynsted Lane and in the village of Lynsted! And yet another two plots declared by SBC Officials as "suitable" connected to Claxfield Lane which also sit on Grade 1 Agricultural land. It is very worrying that there has been PREJUDICIAL 'pre-assessment' by SBC officials that recently went forward to Councillors. Their submission states that ALL the plots south (and north) of the A2 in Teynham and Lynsted Parishes (and Tonge) should be considered "suitable" for approval!!! Swale Borough Council is, in short, promoting a position in which they ignore their legal responsibility under the latest National Planning Policy Framework (NPPF), which states clearly that local authorities MUST NOT approve developments that further worsen conditions for the health of residents already living with appalling air-quality in and alongside AQMAs (up to 1km from the A2 - that includes the WHOLE of Teynham). SBC has no measures available AT THE KERBSIDE to mitigate the harm they are inflicting.

CONCLUSION: If this submission to Councillors has been advised/encouraged by SBC officials, they are ignoring their legal responsibilities under NPPF(2018) when it comes to impacts on AQMAs. They are certainly avoiding the truth that pollution in an AQMA spreads out at comparable levels (in the right conditions) up to one Kilometer north and south of the A2. That is negligent of our health and well-being all along the built-up and congested parts of the A2. It is plain to me that SBC is seeking to condition the debate with Councillors for the revised Local Plan.

For more than a year I have been measuring levels and trends of pollution as we experience it with each breath inside and outside the formal AQMA5. I have been measuring changes in levels of Particulate Matter (PM2.5 and PM10), NOx and VOCs as they are experienced hour-by-hour, minute-by-minute. On the other hand, SBC sticks diffusion tubes that collect general NOx accumulations over days and weeks, when these are working or even in place (!) which is not always the case. So, SBC misses ALL examples of HIGH and VERY HIGH pollution that we experience when there is peak traffic, congestion and when the Motorway is closed. SBC also fails to measure the most harmful pollutants at the scale of PM2.5. When I have raised this with SBC in the past, they choose silence; no doubt to avoid the undeniable link between their planning decisions and the environmental and health impacts. It appears that Planning Officers will do anything to avoid having their hands tied by the whole Council's responsibilities to act as guardian against unfettered housing development in places that already suffer real harm. Those with chronic conditions must simply breathe for as long as they can. How long that is, is very much in the hands of our Councillors.

The behaviour of SBC is to apply their own version of “lock down” – we cannot move house to save ourselves.

Since last autumn, but more so this year, my measurements are being skewed by successive traffic blockages with roadworks along the A2 at Faversham, Teynham, and Bapchild. This has led drivers of all types of vehicles to finding other routes (including our network of narrow lanes and the M2). Coronavirus has also seen massive drops in overall NATIONAL traffic and consequent lower BACKGROUND pollution; but, AT OUR LOCAL LEVEL, **pollution levels have remained harmful at mostly MODERATE levels with occasional HIGH pollution episodes**. This contrast starkly with “normal” conditions around this time last year. So, even with LESS traffic locally and nationally, we are still facing long-term harms in our communities, which can only get worse as roadworks are removed, "lock-down" is eased AND existing approvals for development are brought on-stream in Bapchild, Frogna Lane, Station Road, and Western Link (Ospringe/Faversham).

WE ARE TRAPPED in an existing situation in which SBC's irresponsible approach to planning and National Policy, in recent years, has COMPOUNDED the daily harmful levels of pollution. We now face the possibility that SBC officials will misdirect Councillors to adopt blinkered approvals of yet more land along Lynsted Lane and along the A2.

Any such approvals will be negligent of our health by any measure! Councillors don't need Officials to see how this all works.

**Councillors need to take a more strategic approach to the whole challenge they now face.**

Of course, new housing is needed but not along the A2 between West Faversham and Sittingbourne where such developments are already threatening us with worse pollution and long-term harms to our health and well-being. Developments should be tied to existing trunk roads (the A2 is not a trunk road between Ospringe and Sittingbourne) and closely tied with urban centres where existing infrastructures can be 'flexed' to meet the growing demand made on them.

Councillors have this opportunity to concentrate their effort to benefit from the A249 alongside a serious investment strategy in developing the employment opportunities on Sheppey.

For Faversham, any development should be associated with trunk roads and the motorway network. Central government is helping Kent Highways invest in the strategically important truck road systems connecting with the M2 and M20 --- definitely NOT the backwater stretch of the A2 that we call home!

Please SBC, knock on the head all those opportunistic offerings by land-owners and developers that will kill and harm more people in AQMAs and alongside the AQMAs. Get your thinking-hats on and apply a little logic and **adhere to National Planning Policy Framework obligations**.

Finally, here are two contextual points to guide our Councillors and Officials

(1) building away from urban centres increases dependence on cars and delivery vehicles. Those living in rural areas already have the highest car ownership per household for exactly this reason – most of our ‘services’ are remote – in our main towns.

(2) As reported in May 2020 it was reported in The Times that property sellers and agents are putting pollution reports into the particulars of houses for sale. It is SBC's responsibility to provide meaningful data as a 'public good' in areas of high pollution to fully inform would-be residents, workers and businesses. Currently, SBC restricts itself to NOx and so it is failing in its duty-of-care for

new home build vs harmful PM pollution. Home buyers will notice five AQMAs in key stretches of the A2 - you can draw your own conclusions!