

SWALE BOROUGH LOCAL PLAN REVIEW 2026

REGULATION 19 REPRESENTATION

Proposed Housing Allocation HOA12 – Land at Claxfield Road,
Teynham/Lynsted

SHELAA/153 and SHELAA/154

Representation: Objection

Policy: HOA12 – Draft Housing Allocation

Sites: REG19 document, para 11.12 Policy HOA12 Land at Claxfield Road, Lynsted with Kingsdown Parish (not Teynham Parish as stated in REG19)

- SHELAA/153 – Land at Claxfield Road / both sides of Claxfield Lane – approximately 6.04 hectares – stated capacity up to 242 dwellings (min. 139 applied by The Council).
- SHELAA/154 – approximately 0.52 hectares – stated capacity up to 17 dwellings (min. 12 stated by SBC).

Total stated capacity for these two sites: up to 259 dwellings (151 combined minimum applied by The Council).

Parish: Lynsted with Kingsdown

1. SUMMARY OF REPRESENTATION

I object to the proposed allocation of land at Claxfield Road under Policy HOA12.

The allocation is unsound because the evidence does not demonstrate that a development with the combined potential for up to 259 dwellings (Swale Borough Council have only stipulated a **minimum** of 151+) in this location would constitute a sustainable, deliverable and appropriately located extension of Teynham.

In particular, the allocation:

1. is poorly related to Teynham's existing services, facilities and public transport;
2. depends upon an inadequate rural highway and pedestrian network, including a substantial length of narrow, single-width Claxfield Lane without footway provision;
3. would generate substantial additional car-dependent movements;

4. would place additional pressure on infrastructure which must be demonstrated to have sufficient capacity, particularly wastewater/sewage, water, drainage, education, health and transport infrastructure;
5. raises significant surface-water and other flood-risk concerns which must be addressed through the Council's strategic flood-risk evidence and sequential approach;
6. would result in the loss of the most productive agricultural land (Grade 1) and the urbanisation of an important rural edge;
7. would conflict with SBC's Adopted Supplementary Guidance regarding "sensitive edges" – Lysted with Kingsdown Parish Design Statement;
8. would have landscape, biodiversity and ecological implications, including the need to address the SAMMS/ST11 context and the cumulative effects of additional development;
9. is in tension with the established sensitive-edge character of the Teynham/Lynsted area and the objectives of the relevant local countryside-gap evidence;
10. has not been demonstrated to be the most appropriate location when reasonable alternatives, including previously developed and more sustainable locations, are considered; and
11. has not been demonstrated to be genuinely deliverable within the Local Plan period on the infrastructure, access and environmental evidence currently available.

The Council should therefore delete HOA12 from the Plan.

2. THE RELEVANT TEST OF SOUNDNESS

The National Planning Policy Framework requires local plans to be:

- **positively prepared;**
- **justified;**
- **effective;** and
- **consistent with national policy.**

The Planning Inspectorate's current guidance confirms that the Regulation 19 consultation is the stage at which representations intended to be considered at examination should be made.

I consider Policy HOA12 to fail all four tests, principally because the Council has not demonstrated that this particular allocation is an appropriate and sustainable component of the spatial strategy. The Council is, instead, putting off to some future date the necessary evidential base to justify inclusion of land on offer from the landowner.

3. FAILURE TO BE POSITIVELY PREPARED

3.1 Housing numbers cannot be considered independently of infrastructure

The NPPF requires strategic policies to make sufficient provision not only for homes but also for transport, water supply, wastewater, flood-risk management and community infrastructure.

The allocation of more than 139 and, potentially 259, dwellings therefore cannot properly be justified merely by identifying an available area of land and assigning it a theoretical housing capacity.

The relevant question is whether 139 up to 259 homes can be accommodated sustainably in this particular location.

The Council should demonstrate, with evidence available at Regulation 19, that the necessary infrastructure can be provided in step with development.

This should include, at minimum:

- highway capacity;
- pedestrian infrastructure;
- cycle connectivity;
- public transport;
- wastewater treatment and sewer network capacity;
- potable water supply;
- surface-water drainage;
- primary and secondary education capacity;
- health provision;
- emergency services;
- green infrastructure;
- ecological mitigation; and
- access to employment and everyday services.

The Council's own plan-making evidence recognises that infrastructure provision is an integral part of strategic planning.

An allocation should not be treated as positively prepared where infrastructure constraints are simply deferred to the subsequent planning-application stage.

3.2 The location is inherently poorly connected to Teynham

The proposed allocation lies on Claxfield Lane, away from Teynham's principal concentration of services and the railway station.

The Council's own site assessment material should therefore be examined carefully as to the actual walking and cycling routes available from the site to:

- Teynham railway station;
- shops and services;
- schools;
- health facilities;
- community facilities; and
- employment opportunities.

The critical issue is not merely the geographical distance measured as the crow flies. It is whether there is a safe, convenient and realistic route for residents to make ordinary journeys without a private car.

Claxfield Lane is, for much of its length, a narrow rural lane without continuous footway provision.

That is a fundamental constraint rather than a minor design issue.

A development of up to 259 dwellings would introduce a substantial new population onto a road environment which is not presently designed as a residential pedestrian corridor.

The resulting conflict between pedestrians, cyclists and motor vehicles would undermine the Council's stated objective of locating development in sustainable locations.

4. FAILURE TO BE JUSTIFIED

4.1 The Council has not demonstrated that HOA12 is the most appropriate location

The NPPF's justification test requires an appropriate strategy which takes reasonable alternatives into account and is based on proportionate evidence.

The Council should therefore explain why up to 259 dwellings should be directed into this sensitive rural location rather than to sites which:

- are closer to existing services;
- have established pedestrian and cycle infrastructure;
- are better served by public transport;

- have lower agricultural value;
- have fewer landscape constraints;
- have lower flood risk;
- have lower ecological sensitivity; and/or
- constitute previously developed or brownfield land.

It is not sufficient for a site to be technically capable of accommodating houses.

The strategic question is whether this is an appropriate place for those houses.

On the information presently available, the answer has not been demonstrated.

4.2 The allocation would intensify car dependency

The location of HOA12 is particularly problematic because Teynham is not itself a major employment centre.

Consequently, a significant proportion of residents' journeys for employment, education, shopping, healthcare and other services are likely to be directed elsewhere.

The consequence is potentially substantial additional vehicular movement onto the local highway network and, ultimately, the A2/London Road corridor.

This is contrary to the objective of reducing unnecessary car journeys and securing genuinely sustainable patterns of development.

The Council should publish and rely upon robust transport evidence demonstrating:

- predicted trip generation;
 - origin and destination patterns;
 - modal split;
 - cumulative effects with other committed and proposed developments;
 - junction impacts;
 - pedestrian safety;
 - cycling conditions;
 - public transport accessibility; and
 - the feasibility and deliverability of meaningful modal-shift measures.
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5. CLAXFIELD LANE AND HIGHWAY SAFETY

The physical characteristics of Claxfield Lane constitute one of the strongest site-specific objections.

The lane is narrow for significant lengths between the site and the A2 and lacks continuous pedestrian infrastructure.

A development of up to 259 dwellings would substantially increase traffic on this rural route.

The issue is not simply whether two vehicles can physically pass.

The Council must consider the interaction between:

- vehicles;
- pedestrians;
- cyclists;
- agricultural traffic;
- existing residential traffic;
- emergency vehicles; and
- construction traffic.

The absence of a continuous footway means that residents walking to the A2 or Teynham services could be required to share sections of a constrained rural carriageway with motor traffic.

If the necessary improvements cannot be delivered because sections of Claxfield Lane lie outside the allocation or because physical constraints prevent widening or footway construction, then the Council must explain how a genuinely sustainable access strategy can be achieved.

The allocation should not rely upon infrastructure which is merely aspirational.

6. FLOODING AND SURFACE-WATER DRAINAGE

Flood risk is a strategic allocation issue and not merely a matter for a future reserved technical assessment.

The NPPF requires strategic policies to be informed by Strategic Flood Risk Assessment and requires a sequential, risk-based approach to the location of development. The sequential approach is intended to direct development towards areas with the lowest flood risk and to consider cumulative impacts.

Swale Borough Council itself identifies the Strategic Flood Risk Assessment as evidence informing the choice of allocations and recognises the need for the sequential test in the Local Plan process.

Accordingly, the Inspector should require the Council to demonstrate:

1. the site's flood risk from all relevant sources;
2. the site's surface-water flood risk;
3. the effect of climate change;
4. the cumulative drainage implications of the allocation;
5. whether there are reasonably available lower-risk alternatives;
6. whether safe access and escape can be provided;
7. whether development would increase flood risk elsewhere; and
8. whether sustainable drainage can be delivered without unacceptable residual risk.

If these matters have not been adequately established before allocation, HOA12 is not justified or effective.

7. WATER, WASTEWATER AND DRAINAGE CAPACITY

The allocation should not proceed without clear evidence that the water and wastewater infrastructure required to serve it is available or can be delivered within the Plan period.

The NPPF expressly identifies water supply and wastewater infrastructure as matters that strategic policies must make sufficient provision for.

There are concerns locally regarding wastewater and pumping capacity.

These concerns should not be dismissed as matters for a future planning application.

The Council should publish the relevant infrastructure-provider evidence identifying:

- existing treatment capacity;
- existing network constraints;
- available headroom;
- required upgrades;
- who is responsible for delivering them;
- funding arrangements;
- delivery timescales; and
- whether the infrastructure can be operational before occupation of the proposed dwellings.

If wastewater capacity is already constrained, the Plan must demonstrate how an additional 259 dwellings can be accommodated without unacceptable effects on the environment or existing communities.

The current service provider's advice states that Teynham wastewater and sewage will operate beyond capacity after fifty houses are connected above existing housing numbers. Teynham and Greenstreet are now facing new housing numbers far in excess of that

capacity. Up to 300 homes are currently under construction at Frogmal Lane and ten homes are under construction at the junction between Lynsted Lane and the A2 (London Road). This addition of 310 homes is unsustainable even before the Claxfield Lane proposal of up to 259 homes is added. Swale Borough Council has not demonstrated that the local infrastructure can support the threatened total of 569 new homes.

8. AGRICULTURAL LAND AND COUNTRYSIDE

The proposed development would urbanise **Grade 1 agricultural land** on the rural southern edge of Teynham.

The NPPF requires planning policies to recognise the intrinsic character and beauty of the countryside and the wider benefits of natural capital and ecosystem services, including the economic and other benefits of the best and most versatile agricultural land.

For this reason, the Council should identify the Agricultural Land Classification of the entire allocation rather than relying upon a generalised site description.

Grade 1 agricultural land is a particularly significant consideration because Grade 1 falls within the NPPF definition of Best and Most Versatile agricultural land.

The loss of such land should be properly evidenced and weighed against alternatives.

The Council should demonstrate why the loss of productive agricultural land is necessary and why lower-value or previously developed alternatives cannot reasonably meet the relevant requirement.

9. LANDSCAPE CHARACTER AND THE SENSITIVE EDGE OF TEYNHAM AND GREENSTREET CONSERVATION AREA

The site forms part of the rural setting and southern approach to Teynham.

The Lynsted with Kingsdown Parish Design Statement identifies sensitive edges and the need to respect the character of the settlement and its countryside setting. Swale Borough Council has adopted this document to be part of their Supplementary Planning Guidance.

The proposed development would introduce a substantial built form into that rural setting.

The Council should therefore assess not merely whether the development can be screened by planting, but whether the fundamental spatial relationship between Teynham and its surrounding countryside would be altered.

A 259-dwelling allocation is qualitatively different from limited infill.

It would represent a substantial extension of the settlement into the countryside.

The landscape assessment should consider:

- settlement form;
 - visual prominence;
 - views from public rights of way;
 - views towards Teynham and Lynsted;
 - existing landscape structure;
 - the rural approach to the settlement;
 - cumulative effects with other allocations; and
 - the effect of built development on the perceived separation between settlements.
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10. TEYNHAM–LYNSTED AND LOCAL COUNTRYSIDE-GAP CONSIDERATIONS

The Council's Important Gaps Review provides important evidence concerning the maintenance of separation between settlements and the prevention of their physical or perceived coalescence.

The Council's 2025 gap evidence considered gaps in the Teynham/Sittingbourne area and the role of countryside separation in the spatial strategy.

The Regulation 18 evidence also records the Council's consideration of important gaps, including the Sittingbourne/Bapchild/Rodmersham Green area and other settlement-separation objectives.

The Council must ensure that the spatial strategy and site allocations are consistent with that evidence.

There is particular concern regarding the extent of the proposed **Draft Important Local Countryside Gap (B4)** in the Teynham area.

The B4 designation begins only part-way between the A2 and Batteries, rather than reflecting the full sensitive rural edge identified by the Council's own evidence and local character studies. The Plan should explain the evidential basis for that choice of boundary that will conflict with the Conservation Area designation and character, Adopted Supplementary Guidance for the Parish of Lynsted with Kingsdown and existing/proposed

built-up envelope. This proposed allocation flies in the face of logic and conflicts with SBC's own policies.

The Inspector is invited to examine whether the proposed boundary:

- properly reflects the settlement's existing built-up envelope;
- protects the rural approach to Teynham;
- prevents incremental urbanisation along an adopted "Sensitive Edge" found in Supplementary Planning Guidance;
- maintains meaningful separation between settlements;
- is consistent with the landscape evidence; and
- has properly taken account of the Parish Council's evidence.

The omission of the land around Claxfield Lane from an appropriately drawn countryside gap would weaken the spatial strategy by allowing development pressure to erode the very separation which the gap evidence is intended to protect.

11. CONSERVATION AREA AND HISTORIC ENVIRONMENT

The relationship between the proposed allocation and the Cellar Hill and Greenstreet Conservation Area must be properly considered. So too must the Supplementary Guidance (Lynsted with Kingsdown Parish Design Statement) with respect to the historical pattern of development of the Greenstreet community at one-building-deep. That relationship evolved as a direct result of the importance and preservation of the agricultural land.

The historic development of this area is not simply a matter of individual listed buildings.

The significance of the historic environment includes the spatial relationship between the historic settlement, rural surroundings, historic routes and the evolution of the area through agricultural, commercial, industrial and service functions.

The proposed allocation should therefore be assessed for its effect upon the setting and significance of relevant heritage assets and the historic landscape.

The Council should demonstrate that the allocation's location, scale and capacity have been informed by that assessment rather than leaving the issue entirely to the detailed design stage.

Immediately adjacent to these two plots, sit:

CLAXFIELD FARMHOUSE - Grade: II*. **Wealden Hall-house**. List Entry Number: **1343922**
CLAXFIELD HOUSE - Grade: II List. Entry Number: **1343927**

12. BIODIVERSITY, SAMMS AND HABITATS

The proposed allocation must also be assessed in its wider ecological context.

The Council's Strategic Access Management and Monitoring Strategy (SAMMS) is relevant to development within the applicable zone around designated European sites.

Where a site falls within the relevant SAMMS/ST11 area, the Council must consider the implications of additional population, recreational pressure and cumulative effects upon designated habitats and species.

The issue should not be reduced to whether a developer can make a financial SAMMS contribution.

Mitigation must be considered in the context of the overall ecological effects and the cumulative number of homes being allocated across the relevant area. This proposal will significantly enlarge demands on the environment.

The NPPF requires plans and decisions to minimise impacts on biodiversity and provide net gains, while the biodiversity net gain regime operates separately from other ecological and Habitats Regulations requirements.

The Inspector should therefore require the Council to demonstrate that the Habitats Regulations Assessment and associated ecological evidence have adequately considered:

- the individual effects of HOA12;
- cumulative effects with other allocations;
- recreational disturbance;
- traffic-related effects;
- surface-water and pollution pathways;
- construction effects; and
- the adequacy and deliverability of mitigation.

A 10% biodiversity net gain requirement does not, by itself, make an environmentally unsuitable allocation acceptable. Biodiversity net gain is distinct from the mitigation hierarchy and from the Habitats Regulations assessment process.

13. CUMULATIVE IMPACTS

The allocation cannot reasonably be assessed in isolation.

The Council must consider the cumulative consequences of HOA12 together with existing commitments and other proposed development in and around Teynham and Lynsted. That includes the 300 homes currently under construction off Frognal Lane, 10 homes off Lynsted Lane, Norton Crossroads proposal, expansion of cold-storage footprint, additional development proposed at Ospringe to the west of the market town of Faversham.

The traffic burden (both in terms of capacity and PM2.5 pollution) between our two major urban centres (Sittingbourne and Faversham) argues against ANY additional development at scale that is unsustainable in and around the Teynham and Lynsted with Kingsdown Parishes.

In particular, the Inspector should consider the combined effects upon:

- London Road/A2 traffic (PM2.5 pollution, congestion/capacity, increased risks to pedestrians wanting to cross the A2);
- Claxfield Lane;
- local walking and cycling infrastructure;
- railway-station capacity and access;
- wastewater infrastructure;
- surface-water drainage;
- schools;
- healthcare;
- ecological receptors;
- landscape character;
- agricultural land;
- countryside gaps; and
- the overall spatial form of Teynham.

The cumulative effect may be materially greater than the effect of any individual allocation considered separately.

14. RELATIONSHIP WITH THE FROGNAL LANE DEVELOPMENT

There is already an extant housing permission associated with:

Planning Reference 23/505541 – Land between Frognal Lane and Lower Road, Teynham – 298 dwellings.

The existence of an extant 298-dwelling commitment makes it particularly important that the Council considers the cumulative infrastructure consequences of allocating a further 139 to 259 dwellings at Claxfield Lane.

The relevant question is therefore not whether Teynham can accommodate HOA12 in isolation.

It is whether the existing commitment plus HOA12, together with other proposed developments, can be sustainably accommodated by the settlement and its infrastructure.

The Council should provide a cumulative infrastructure assessment addressing this matter explicitly.

15. EFFECTIVENESS AND DELIVERABILITY

The effective test requires an allocation to be deliverable over the Plan period.

HOA12 should not be regarded as effective merely because the landowner has expressed an interest in development.

The Council should identify the critical infrastructure and mitigation requirements and demonstrate that they are realistically deliverable.

Particular attention should be given to:

- access land;
- highway improvements;
- footway provision;
- cycle connections;
- drainage;
- wastewater;
- utilities;
- ecological mitigation;
- landscape mitigation;
- heritage mitigation;
- land ownership;
- viability; and
- realistic delivery timescales.

If necessary, infrastructure depends upon land outside the allocation, third-party agreement, substantial off-site works or infrastructure investment which has not been secured, that should be transparently identified. “Infrastructure first” principle should be adhered to, taking in both the Frognal Lane approval and Claxfield Lane proposal.

Southern Water are on record describing existing treatment as “poor condition”. The current sewage treatment site is very close to Railway Cottages (north of Teynham Railway Station) and would need to expand considerably to match a potential addition of up to 569 around Teynham. The Teynham plant has frequently released raw sewage into the local environment that falls inside the designated SAMMS area.

The Planning Inspectorate’s current examination guidance emphasises that the Regulation 19 plan should be supported by a complete evidence base and that LPAs should address deliverability and viability before submission rather than relying upon the examination process to cure fundamental deficiencies.

16. VIABILITY AND DELIVERY EVIDENCE

Concerns have also arisen from the history of development proposals in the Teynham/Lynsted area, including the abandonment or failure of previous proposals. For example, the earlier REG19 notion of an “Teynham Area of Opportunity” was explored in detail and rejected as inappropriate and unviable. The Council were persuaded to retreat from their proposals for development at scale in an unsustainable position. It is important to understand that Teynham, as a Service Centre, has progressively lost significant numbers of shops, two GP surgeries, the loss of two pubs (The Railway Inn and The Fox). This pattern of erosion in services renders any new housing wholly inappropriate to the locations around Teynham/Greenstreet.

Those matters should not be treated as conclusive evidence that HOA12 is incapable of **delivery**.

However, they reinforce the need for the Council to demonstrate, rather than assume, that the allocation is **viable**.

The Council should publish sufficient viability evidence to establish that the site can accommodate:

- affordable housing requirements;
- necessary highway works;
- pedestrian and cycle infrastructure;
- drainage;
- wastewater infrastructure;
- ecological mitigation;

- landscape measures;
- heritage mitigation;
- open-space requirements; and
- other infrastructure contributions.

If the necessary mitigation makes the allocation economically unviable, that is directly relevant to the effectiveness test.

17. THE ALLOCATION SHOULD NOT BE SAVED BY FUTURE CONDITIONS

A fundamental concern is that several of the problems associated with HOA12 appear capable of being deferred to the planning-application stage.

That is inappropriate where the problem concerns the fundamental suitability of the site for allocation.

The Council must establish **at plan-making stage** that the site can be sustainably developed.

A future condition cannot create:

- a missing footway where no deliverable route exists;
 - wastewater capacity where the necessary infrastructure cannot be delivered;
 - a safe pedestrian environment where the physical highway cannot accommodate it;
 - an appropriate landscape relationship where the scale of development is inherently inappropriate; or
 - a sustainable location where residents are inherently dependent upon private vehicles.
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18. REASONABLE ALTERNATIVES

The Council should demonstrate that reasonable alternatives have been properly considered.

In particular, the spatial strategy should explain the relative merits of:

- previously developed land;
- brownfield opportunities;
- sites closer to existing services;

- sites with better public transport accessibility;
- sites with better walking and cycling connections;
- sites with lower flood risk;
- sites with lower ecological sensitivity; and
- sites which would cause less loss of Best and Most Versatile agricultural land.

The existence of a housing requirement does not automatically justify the release of every site capable of accommodating housing.

The justification test requires the strategy to be appropriate when reasonable alternatives are considered. It is insufficient to argue that this allocation seeks to “share the pain” across a Local Plan coverage. That is a neglectful abandonment of rational Plan Making.

19. NATIONAL POLICY CONTEXT

The objection is supported by the following national planning principles:

Sustainable location

Strategic planning should integrate housing with transport, infrastructure and community facilities.

Agricultural land and countryside

The NPPF requires recognition of the intrinsic character and beauty of the countryside and the benefits associated with Best and Most Versatile agricultural land.

Flood risk

Development should be directed away from areas at highest risk and plans should apply a sequential, risk-based approach, considering cumulative impacts and climate change.

Biodiversity

Plans should minimise impacts and provide biodiversity gains, while significant biodiversity harm should be avoided, mitigated or, only as a last resort, compensated.

Infrastructure

Strategic policies must make sufficient provision for transport, water supply, wastewater, flood-risk management and community infrastructure.

20. CONCLUSION

Policy HOA12 is not presently supported by sufficient evidence to establish that an allocation of up to 259 dwellings at Claxfield Lane is a sustainable and deliverable component of Swale's spatial strategy.

The site is poorly connected to Teynham's facilities, relies upon a constrained rural highway, lacks a continuous pedestrian environment, risks increasing car dependency and requires substantial infrastructure investment.

Those concerns are compounded by the site's rural landscape setting, agricultural land value, flood and drainage concerns, ecological sensitivity, countryside-gap considerations and the cumulative effect of other development commitments.

The Council has not demonstrated that the allocation is the most appropriate option when reasonable alternatives are considered.

For those reasons, I respectfully submit that Policy HOA12 is:

**not positively prepared;
not justified;
not effective; and
not consistent with national policy.**

21. REQUEST TO THE COUNCIL AND INSPECTOR

I respectfully request that the Council:

1. Delete Policy HOA12 and remove SHELAA/153 and SHELAA/154 from the housing allocation schedule.

The Council does should accept deletion in the absence of robust evidence demonstrating:

- a safe and deliverable access strategy;
- continuous and safe pedestrian connectivity;
- meaningful cycling connectivity (In 2024, during a 24-hour manual count of traffic through London Road, there were 27 bicycle trips:-
 - Toward Sittingbourne: 7 on pavements, 7 on road
 - Toward Faversham: 6 on pavements, 7 on road);
- public transport accessibility;
- cumulative highway impacts (In 2024, during a 24-hour manual count of traffic through London Road – a total of 17,339 vehicles passed along the A2 (the 2019 pre-covid modelling showed 14,000 vehicle movements);

- wastewater and water infrastructure capacity;
- surface-water and all-source flood-risk assessment;
- sequential-test compliance;
- agricultural land classification;
- landscape and visual effects;
- heritage effects;
- ecological and Habitats Regulations effects;
- SAMMS/ST11 implications;
- cumulative infrastructure requirements;
- viability;
- landownership and delivery arrangements; and
- the assessment of reasonable alternative sites.

If the matter proceeds to examination, I respectfully request that the Inspector consider HOA12 as a specific site-allocation soundness matter.

The Inspector is invited to find that the allocation fails the tests of soundness and should be deleted.

22. EVIDENCE TO BE CONSIDERED

This representation should be read alongside, and the Council is requested to take account of, the following evidence and documents where applicable:

1. Swale Borough Local Plan Review Regulation 19 Publication Plan;
2. Policy HOA12 and its supporting site assessment;
3. SHELAA/153 and SHELAA/154 evidence;
4. Swale Strategic Flood Risk Assessment;
5. Swale Local Plan Flood Risk / Sequential Test evidence;
6. Swale Important Gaps Review (February 2025);
7. Lynsted with Kingsdown Parish Design Statement (Adopted Supplementary Guidance);
8. relevant Conservation Area appraisal and management evidence;
9. Swale SAMMS/ST11 evidence;
10. Habitats Regulations Assessment;
11. Swale Infrastructure Delivery Plan;
12. Swale Transport Strategy;
13. relevant highway and traffic evidence;
14. relevant water and wastewater infrastructure-provider representations;
15. relevant agricultural land classification evidence;

16. landscape character and visual assessment evidence;
 17. the extant planning permission at Frognal Lane / Lower Road, Teynham (23/505541);
and
 18. relevant representations and evidence submitted by Teynham Parish Council and Lynsted with Kingsdown Parish Council.
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23. FINAL REPRESENTATION

I object to the allocation of SHELAA/153 and SHELAA/154 under Policy HOA12 and request that the allocation be deleted from the Swale Local Plan Review.

The allocation represents an inappropriate expansion into the rural setting of Teynham/Lynsted without sufficient evidence that the necessary transport, drainage, wastewater, ecological, landscape and community infrastructure can be delivered.

The fundamental issue is therefore not whether housing could physically be built on the land. It is whether **up to 259 dwellings can be sustainably accommodated at this location without unacceptable environmental, infrastructure, transport and settlement-form consequences.**

The evidence presently available does not demonstrate that this is the case.

Accordingly, HOA12 should not proceed to adoption.