

Swale Borough Local Plan Review — Regulation 18 Response from Teynham Parish Council

Version 01
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Introduction

Teynham Parish Council welcomes the opportunity to respond to the Swale Borough Local Plan Review (Regulation 18) and supports early engagement on the emerging Development Management policies.

Teynham Parish Council encourages Swale Borough Council to prepare a Local Plan that not only accommodates necessary growth but also delivers high-quality, sustainable places supported by appropriate infrastructure.

The Local Plan must ensure that development enhances residential amenity, environmental quality, and community wellbeing, while protecting the distinct character, heritage, and landscape of Swale's settlements.

Growth must be aligned with the timely provision of physical, social, and environmental infrastructure.

Question 1: Do you have any comments on Section 1 of the draft Local Plan which will inform the Plan's progression?

Teynham Parish Council notes the proposed Local Plan timetable and emphasises the importance of progressing the Plan as efficiently as possible.

The proposed timetable to adopt an updated Local Plan may increase the risk of speculative development being determined under less robust policy frameworks.

Teynham Parish Council requests clarification on how appropriate weight will be given to emerging Local Plan policies during the transition period prior to formal adoption.

It is essential that decision-making during this period reflects the clear direction of travel set out in the emerging Plan, particularly where infrastructure capacity constraints exist.

Question 4: Is the Vision positive, clear, realistic and ambitious and does it identify the right priorities for Swale?

Teynham Parish Council supports the overarching ambition of the Vision but considers that it should place stronger emphasis on the quality and sustainability of places, rather than focusing primarily on development delivery metrics.

A successful Local Plan should ensure that growth enhances residential amenity, environmental quality, and community wellbeing.

Teynham Parish Council recommends strengthening the Vision in the following areas:

Protecting Quality of Place and Environmental Character

Swale's rural landscapes, historic settlements, and natural environment are fundamental assets that contribute to the borough's identity, attractiveness, and economic sustainability.

The Vision should explicitly recognise the importance of:

- protecting landscape character and settlement identity
- maintaining dark skies and minimising light pollution
- preserving tranquillity and acoustic amenity in rural areas
- safeguarding the setting of historic buildings and heritage assets

These qualities are essential to maintaining the distinctiveness and environmental value of Swale's settlements and open spaces.

Supporting a Place-Based Economy

Teynham Parish Council supports economic development that reflects and strengthens the borough's unique environmental and cultural assets.

This includes supporting:

- heritage and nature-based tourism
- local food production and experiences
- green skills and retrofit industries
- TV and Film locations
- small and micro-businesses rooted in local communities
- creative and cultural uses of historic buildings and landscapes

Such activity strengthens local economic resilience while protecting the environmental assets upon which it depends.

Delivering Sustainable and Complete Communities

Teynham Parish Council supports growth that delivers sustainable, well-functioning communities supported by appropriate infrastructure and services.

New development should:

- integrate effectively with existing settlements
- provide accessible public spaces and community facilities
- support active travel and reduce car dependency
- promote social interaction and community cohesion

Success should be measured not only by housing numbers but by the creation of high-quality, sustainable places.

Question 10: Do you agree with the proposed wording of Policy GD1 (Local Design Principles)?

Teynham Parish Council strongly supports the objective of achieving high-quality design.

However, the policy would benefit from clearer structure and measurable requirements to ensure effective implementation and enforcement.

Teynham Parish Council recommends strengthening the following areas:

Clear and Enforceable Design Requirements

Policy GD1 should clearly require development to demonstrate:

- appropriate scale, massing, and materials
 - positive response to local character and context
 - integration with surrounding development
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Active Travel and Connectivity

Major development proposals should include a Connectivity and Active Travel Statement demonstrating:

- integration with existing walking and cycling networks
- provision of safe and attractive routes
- reduction of reliance on private vehicles

Light Pollution and Dark Sky Protection

External lighting, including illuminated signage, should:

- be minimised
- be downward-directed to prevent light spill
- use warm colour temperatures to reduce environmental impact
- be time limited

This is essential to protect residential amenity, biodiversity, and rural character.

Administrative Clarity

Administrative requirements unrelated to design principles should be placed in supporting guidance rather than within design policy itself.

Question 42: Policy INF1 – Managing transport demand & impact

Teynham Parish Council supports the intent of Policy INF1 and its emphasis on sustainable transport and reducing reliance on private vehicles. However, the policy would benefit from strengthening to ensure development genuinely reduces transport demand and supports sustainable settlement patterns.

Active Travel and Settlement Integration

Development proposals should be required to demonstrate clear integration with existing settlements and services, including:

- safe, direct, and attractive walking and cycling routes
- connectivity to local centres, public transport, and community facilities
- integrated and co-ordinated public transport to key services (eg. GPs and hospitals).
- layouts that prioritise pedestrian and cycle movement over vehicle dominance

This is particularly important in rural settlements such as Teynham and Conyer, where poor connectivity leads to increased reliance on private car use.

Development that is physically or functionally isolated from existing settlements risks creating long-term car dependency and should be resisted unless sustainable connectivity is demonstrably achievable.

Access to Essential Services and Transport Demand

Access to essential services, including healthcare, education, and retail, is a critical component of managing transport demand.

Where existing or new development is located without reasonable access to key services by walking, cycling, or public transport, residents are forced to rely on private vehicles, leading to increased traffic, congestion, and environmental impacts.

Policy INF1 should therefore require a holistic approach to accessibility, ensuring that both new and existing communities have reasonable access to essential services. This should include situations where services are relocated or consolidated, potentially increasing travel distances for whole communities—for example the GP surgery at Teynham relocating to Sittingbourne. Development proposals should demonstrate reasonable accessibility by walking, cycling, and public transport, or secure appropriate mitigation to minimise reliance on private vehicles and reduce transport impacts.

Supporting Flexible and Future-Proof Infrastructure

Teynham Parish Council supports recognition of changing travel and working patterns.

The policy should support:

- digital infrastructure that reduces the need to travel for work and services
 - adaptable infrastructure that supports evolving transport technologies
 - infrastructure planning that anticipates future changes in travel behaviour
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Policy Clarity

Teynham Parish Council recommends improving the structure of Policy INF1 to group requirements under clear themes such as:

- sustainable transport and active travel
- accessibility and integration with services
- infrastructure capacity and mitigation

This would improve clarity and effectiveness for applicants, decision-makers, and communities.

Question 69: Policy C9 and Policy C10 – Water Quality and Water Resources

Teynham Parish Council supports the objectives of these policies but considers that Policy C10 requires strengthening to ensure effective protection of infrastructure and the environment.

Water Lifecycle and Capacity as a Development Constraint

In Teynham the management of wastewater operates under significant constraints.

Across Kent there have been multiple examples of fresh water supply issues.

Teynham Parish Council recommends that the policy clearly state that development should only proceed where:

- **Sufficient Fresh Water Resource and Supply Capacity exists:** Proof must be provided that the local network can deliver required volumes and maintain water pressure without detrimental impact on existing residents or the local aquifer; and
- **Sufficient Wastewater Infrastructure Capacity exists:** Evidence must be provided that the network can accept additional flows without increasing the risk of sewer flooding or storm overflow discharges.

Where capacity is lacking, necessary upgrades must be fully funded and secured. Reliance on uncertain or aspirational infrastructure improvements should be avoided. The Parish Council advocates for the use of **Grampian Conditions** to ensure that no dwellings are occupied until both the supply and discharge infrastructure are fully operational and verified.

Cumulative Infrastructure Impact Assessment

Teynham Parish Council considers that infrastructure constraints often arise from cumulative development rather than individual proposals.

Policy C10 should require assessment of cumulative impacts at settlement level to ensure infrastructure capacity is not exceeded.

The Parish Council advocates for the use of **Grampian Conditions** to ensure that no dwellings are occupied until the necessary wastewater capacity upgrades are fully operational.

Catchment-Based and Nature-Based Solutions

Teynham Parish Council strongly supports catchment-based approaches and nature-based drainage solutions.

These approaches:

- improve water quality
 - reduce flood risk
 - support biodiversity
 - enhance environmental quality
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Question 72: Do you agree with the proposed wording of Policy C12 (Pollution and Land Instability)?

Teynham Parish Council supports strengthening measures to minimise light pollution and protect environmental quality.

Lighting should be carefully controlled to protect:

- residential amenity
 - biodiversity
 - rural landscape character
 - night sky
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Question 81: Do you agree with the proposed wording of Policy B4 (Separation of Settlements)?

Teynham Parish Council strongly supports Policy B4.

Maintaining separation between settlements is essential to:

- preserve village identity
- protect landscape character
- prevent incremental settlement coalescence

Specifically, the policy must prevent the 'ribbon development' along the A2 that threatens to turn the distinct villages into a continuous urban sprawl.

The policy should be applied robustly and consistently.

Question 103: Do you have any further comments?

Teynham Parish Council emphasises that infrastructure delivery must be fully synchronised with the timing of development to ensure sustainable growth and to protect existing communities.

Infrastructure includes physical, social, and environmental infrastructure, such as transport, wastewater systems, and primary healthcare provision. These must be treated as essential prerequisites to development, not optional or deferred considerations.

Infrastructure Capacity as a Precondition of Development

Development should only proceed where sufficient infrastructure capacity is demonstrated to exist, or where necessary infrastructure is secured and delivered in advance of occupation.

This is particularly important in Teynham, where primary healthcare provision has been reduced following the relocation of the village GP surgery. This has significantly increased travel distances for residents and placed additional pressure on surrounding healthcare facilities.

The Local Plan should clearly state that development must not proceed unless:

- infrastructure capacity assessments demonstrate sufficient provision exists; or
- necessary infrastructure upgrades or new provision are fully secured through planning obligations and delivered prior to occupation.

Use of Planning Obligations and Grampian Conditions

Planning obligations and conditions must be used robustly to ensure infrastructure is delivered in a timely and enforceable manner.

This should include:

- Section 106 agreements specifying infrastructure requirements clearly and unambiguously
- pre-occupation triggers requiring infrastructure to be operational before dwellings are occupied
- use of negatively worded “Grampian Conditions” where off-site infrastructure is required

These mechanisms are essential to ensure that development does not outpace infrastructure provision.

Certainty and Deliverability

Teynham Parish Council

Reliance on uncertain, unfunded, or aspirational infrastructure improvements should be avoided. Infrastructure delivery must be:

- clearly identified
- fully funded
- legally secured
- deliverable within appropriate timescales

This approach provides certainty for communities, developers, infrastructure providers, and decision-makers.

Sustainable and Plan-Led Growth

Ensuring infrastructure is delivered alongside development is fundamental to achieving sustainable development, maintaining community wellbeing, and preserving confidence in the planning system.

Teynham Parish Council strongly encourages Swale Borough Council to adopt a clear and enforceable approach to infrastructure delivery within the Local Plan.

Policy Clarity and Enforceability

Teynham Parish Council encourages Swale Borough Council to ensure that Local Plan policies are clear, concise, and organised around coherent themes. Policies should be written in plain, unambiguous language so expectations are transparent, applied consistently, and capable of being effectively enforced.

Conclusion

Teynham Parish Council supports the preparation of a robust and ambitious Local Plan.

Teynham Parish Council looks forward to continued engagement as the Plan progresses and emphasises the importance of ensuring that development is supported by appropriate infrastructure, protects environmental quality, and delivers sustainable and high-quality places.