

1. Overall Position

Teynham Parish Council (Teynham PC) supports a plan-led approach to growth and welcomes positive elements of the draft Plan, including the proposed countryside gaps. We want Teynham to be a successful, distinctive village: a place where people can live well, local businesses can thrive, and growth helps sustain the services and community life on which residents depend.

However, Teynham PC considers that the Plan is not yet sound in several important respects.

In particular, it does not adequately demonstrate the cumulative effect of development around Teynham, or how the transport, infrastructure and services needed to support that growth will be delivered.

2. Cumulative Development around the Teynham area

Relevant policies: ST2, ST9, ST10, ST12, HOA12, INF1, C8–C11, B2, B4, B6, B8, Extant 1.

Teynham PC's principal concern is the impact of cumulative development.

Residents and businesses experience development cumulatively: through traffic on the A2, pressure on rural lanes, demand for healthcare and utilities, and changes to the character and functioning of the village. These effects cannot sensibly be considered one site at a time.

The current position indicates:

- Existing Teynham housing stock: approximately 1,300 homes
- Committed development affecting the Teynham area: approximately 375 homes
- Minimum further proposed development (2026 Reg 19): 278 homes
- Minimum additional development: approximately 653 homes
- Potential additional HOA12 capacity (SHELAA 153 and 154): up to approximately 120 further homes
- Potential cumulative uplift: approximately 653–773 homes, equivalent to roughly 50–59% of Teynham's existing housing stock

Even allowing for parish boundaries, this is a major change affecting the same A2 corridor, rural road network, infrastructure, services and local economy. Growth on this scale needs to be planned as a whole, with clear evidence that the combined impacts can be accommodated and mitigated.

Soundness concern: Not Justified and Not Effective.

Teynham PC asks SBC to: provide a clear cumulative assessment of committed and proposed development across the Teynham–Sittingbourne corridor; assess the combined transport, infrastructure, environmental and service impacts; and clarify the relationship between the minimum HOA12 figure and the assessed capacities of SHELAA/153 and SHELAA/154.

**Detail breakdown of existing, committed and proposed development
in the Teynham area**

Category	Site / Location	Status	Approx Dwellings	Notes relevance to Soundness
Existing Settlement	Teynham	Existing	≈1,300	Establishes baseline; essential for assessing cumulative impact.
Committed Development	Land between Frognal Lane and Lower Rd	Frognal Place Permission granted 23/505541/REM	298	Major committed scheme; wastewater constraint limiting initial connections.
	Brickworks Conyer	Permission granted SW/06/1448	24	Narrow rural roads; HGV conflict; limited footways.
	Claxfield (*)	Permission granted  Add scheme ref	10	Adds to A2 corridor cumulative impact.
	Lynsted Lane (*)	Permission granted 21/502609/OUT	10	Adds to A2 corridor cumulative impact.
	Land north of Lower Road	Permission granted 25/501882/FULL	23	Narrow rural road; HGV conflict; no footways.
	Mayfield, London Rd	Permission granted 24/503588/OUT	10	Adds to A2 corridor cumulative impact.
Proposed Development	Former Piggery Lower Road	Application submitted 20/503223/OUT (May be superseded by Reg 19 HOA16d)	9	Severe rural lane constraints. Safety concerns. Adds to cumulative rural lane pressure.
	The George Inn London Road(*)	Application submitted 26/501564/FULL	9	Adds to A2 corridor cumulative impact.
	Claxfield Road (*)	Proposed HOA12 Reg 19 Local Plan, SHELAA/153 & SHELAA/154	Min 139 See note >>>>>>	Adds to A2 corridor impact. <u>SHELAA/153 and 154 require clarification (possibly 259 dwellings)</u> ; see Teynham PC soundness concern above.
	Former Piggery Lower Road	Proposed HOA16d Reg 19 Local Plan	30	Severe rural lane constraints. Safety concerns. Adds to cumulative rural lane pressure.
	Norton Ash Garden Centre	Proposed HOA13 Reg 19 Local Plan	Min 100	Adds to A2 corridor cumulative impact.

Note: Some sites (*) lie in Lynsted with Kingsdown parish but access the same A2 London Road corridor and therefore affect Teynham. The Highsted Park applications are addressed separately below.

3. Transport, Highways and Car Dependency

Relevant policies: ST10, INF1, B8.

Teynham PC supports reducing car dependency, but this requires realistic alternatives.

Teynham and surrounding communities have limited public transport; Conyer has lost its bus service; healthcare is now outside the village; and there is no direct bus to key hospital destinations. Rural lanes are narrow and regularly carry HGVs and agricultural vehicles, while safe walking and cycling routes are incomplete.

The Plan should not assume that development will generate less car travel unless the transport evidence shows how that will happen in practice.

Soundness concern: Not Effective and inconsistent with national policy.

Teynham PC asks SBC to: update the transport evidence and modelling to reflect the combined growth proposed, actual public transport provision, A2 conditions, HGV and agricultural traffic, rural road constraints, and realistic walking and cycling opportunities. The Plan should identify deliverable improvements, not rely on assumed changes in travel behaviour.

4. Infrastructure, Services and a Thriving Village

Relevant policies: ST8 (Health and Wellbeing), ST9 (Planning for Infrastructure), INF3 (Open Space, Sport and Recreation), relevant water and drainage policies, and the Infrastructure Delivery Plan.

New housing should help Teynham thrive, not simply increase the number of people who must travel elsewhere for basic services. The village no longer has a GP surgery or NHS dentist, has experienced water-supply interruptions, and there are concerns about wastewater capacity.

Growth should strengthen Teynham as a complete, healthy community, meeting the needs of people at different stages of life: children and families, teenagers and young adults, working-age residents and older people. This means providing appropriate local facilities and ensuring reasonable access to healthcare, education and childcare, recreation, transport, community spaces, employment and opportunities to remain active, independent and connected.

Growth should also support local shops, businesses and community facilities, strengthening community life and opportunity.

Soundness concern: Not Effective.

Teynham PC asks SBC to: update the Infrastructure Delivery Plan to clearly identify the infrastructure and service improvements required to support growth, when they will be delivered, who is responsible and how they will be funded. This should demonstrate how growth will meet the needs of residents at different stages of life, strengthen local services and businesses, and ensure infrastructure keeps pace with development.

5. Countryside and Settlement Separation

Relevant policies: B2, B4, B6.

Teynham PC strongly supports the proposed Important Local Countryside Gaps between Teynham–Lynsted and Teynham–Bapchild. They are important to maintaining settlement separation, village identity and rural character.

Teynham PC considers that the boundaries should be strengthened to provide lasting protection, including land north of Lower Road and towards Faversham. The proposed allocation at Norton Ash Garden Centre (HOA13) towards Faversham, together with the recent approval of development north of Lower Road (25/501882/FULL), demonstrates the potential for incremental development to extend beyond the existing settlement and progressively erode the remaining countryside between settlements.

Soundness concern: Not Justified.

Teynham PC asks SBC to: review and extend the countryside gap boundaries so they provide effective, long-term separation between settlements and protect Teynham’s distinct identity as development takes place.

6. Sustainability of Teynham

Relevant policies: ST2, ST9, ST10.

Teynham PC does not challenge Teynham’s position in the settlement hierarchy. However, the assessment must reflect the village as it is now. Residents have lost local GP and NHS dentist services, public transport is limited, and many essential journeys require a car.

At the same time, sustainability should recognise the value of retaining and strengthening services and businesses within the village, so that a growing population can meet more of its day-to-day needs locally.

Soundness concern: Not Justified.

Teynham PC asks SBC to: update the sustainability assessment to reflect current healthcare and public transport provision, the need to travel outside the village for essential services, and the importance of maintaining and strengthening local shops, businesses and community facilities.

7. Lower Road and Rural Routes

Relevant policies: INF1, B8.

Lower Road and surrounding lanes are narrow, constrained and in places unlit, with incomplete footways and regular HGV and agricultural traffic. The corridor has also experienced serious and fatal collisions. Teynham PC has asked KCC to undertake a wider safety review.

Additional housing using these routes should not be allocated on the basis of modelling that fails to reflect their actual geometry, traffic mix and use by pedestrians and cyclists.

Soundness concern: Not Justified and Not Effective.

Teynham PC asks SBC to: require a realistic cumulative traffic and road-safety assessment for Lower Road and connected rural lanes, taking account of historic collision patterns, HGV and agricultural movements, vulnerable road users and the physical constraints of the routes. Any necessary mitigation should be identified and shown to be deliverable.

8. Vision for Swale to 2042

The Vision should be clearer about what existing communities gain from growth.

For Teynham, success should mean more than additional housing: it should mean better infrastructure, stronger local services, viable businesses, safer and more sustainable travel, and protection of the qualities that make the village a good place to live.

The Plan should also explain how delivery will continue through the transition to the new Mid Kent Council.

Soundness concern: Not Positively Prepared.

Teynham PC asks SBC to: strengthen the Vision and delivery framework so that growth is explicitly linked to measurable improvements for existing communities, including infrastructure, services, transport, community facilities and the vitality of local businesses, with clear continuity through local government reorganisation.

9. Heritage, Landscape and Village Character

Relevant policies: ST12, B2, B4, HE1, HE2.

Teynham's distinctive historic and rural character should help shape future growth. Key assets include Grade II* Claxfield Farmhouse, Grade II Claxfield House, the Cellar Hill and Greenstreet Conservation Area, and other designated assets across the parish, including Grade II* Frognal Farmhouse.

Their settings, landscape, historic routes and relationship with the village and countryside contribute to Teynham's character, identity and sense of place.

Growth should conserve and enhance this character, creating an attractive environment that residents can enjoy and take pride in, while supporting visitors, local businesses and the wider economy.

Soundness concern: Not Justified and inconsistent with national policy.

Teynham PC asks SBC to: assess the cumulative effects of growth on heritage assets, their settings, landscape and village character, and ensure policies conserve and enhance Teynham's local distinctiveness.

10. Agricultural Land

Relevant policy: B6.

The Teynham area contains significant Grade 1 and Grade 2 agricultural land. This is Best and Most Versatile land and an important, finite resource for food production. Its loss should be considered cumulatively as well as site by site.

Soundness concern: Not Justified and inconsistent with national policy.

Teynham PC asks SBC to: demonstrate that the loss of Grade 1 and Grade 2 agricultural land has been properly assessed and justified, including cumulative loss and reasonable alternatives, and strengthen policy protection where necessary.

11. Highsted Park

The two Highsted Park applications (21/503906/EIOUT and 21/503914/EIOUT), for up to approximately 8,400 homes, remain undetermined and are before the Secretary of State following the public inquiry.

Teynham PC does not suggest that Highsted Park should be treated as committed development or as an allocation in this Plan. However, its scale and proximity create a major strategic uncertainty for housing, transport and infrastructure in this part of Swale.

Teynham PC asks SBC for a contingency strategy in case the Secretary of State approves either or both of the schemes. To explain how the Plan's development strategy and infrastructure assumptions would respond if either or both Highsted Park applications were permitted, including the cumulative implications for the A2 corridor, Teynham and the surrounding rural road network.

12. Conclusion

Teynham PC supports a plan-led approach and wants Teynham to remain a thriving and sustainable village. We accept that communities change and that well-planned growth can help support local services and businesses. But growth must be matched by infrastructure, safe and realistic transport choices, protection of the countryside and heritage, and a clear understanding of the combined effect of development.

Teynham PC therefore asks SBC to amend the Plan and its evidence base in the areas identified above, with particular priority given to:

- a proper cumulative assessment of development around Teynham and the A2 corridor
- clear, funded and timed infrastructure and service delivery
- realistic transport and rural road-safety evidence
- protection of settlement separation, heritage, landscape and productive farmland
- a positive strategy for Teynham's local services, businesses and community life as the village grows

Supporting Evidence

The following evidence supports the matters raised in this representation.

Format: fact/evidence → source → relevance to soundness

A. Healthcare Access

Evidence: Teynham no longer has a GP surgery or NHS dentist. The GP practice relocated to Sittingbourne Memorial Hospital, requiring residents to travel outside the village for primary healthcare.

Source: Medic Care Surgery – practice information and relocation updates.

Relevance: The Plan should reflect current access to essential services and the resulting travel requirements, particularly where there is no direct bus connection (**Not Justified**).

B. Public Transport

Evidence: Public transport is limited. Conyer has lost its bus service and Teynham railway station generally has around one train per hour in each direction.

Source: Kent Connected; Southeastern.

Relevance: Limited public transport restricts realistic alternatives to private-car use for healthcare, employment and essential services. Assumptions about reducing car dependency must therefore be realistic and deliverable (**Not Justified / Not Effective**).

C. Water and Wastewater

Evidence: Teynham has experienced significant interruptions to mains water supply. Southern Water has also identified a wastewater capacity constraint affecting the permitted 298-home Frognaal Place development, restricting initial connections to **[confirm exact number/wording]** pending network improvements.

Source: South East Water incident number 157152 information; Southern Water planning consultation response/correspondence [references to insert].

Relevance: Further growth requires clear evidence that adequate water and wastewater capacity will be available when needed, together with identified and funded improvements (**Not Effective**).

D. Rural Roads

Evidence: Lower Road and surrounding rural lanes are narrow and constrained, with limited visibility, incomplete footways and regular HGV and agricultural traffic. The corridor has also experienced serious and fatal collisions.

Source: KCC highway information; collision records; Teynham PC correspondence requesting a wider Lower Road safety review.

Relevance: Further development affecting these routes requires a realistic cumulative assessment of traffic, road safety and vulnerable road users (**Not Justified / Not Effective**).

E. Agricultural Land

Evidence: The Teynham area contains significant areas of Grade 1 and Grade 2 Best and Most Versatile agricultural land. This highly productive landscape forms part of the historic agricultural heartland that gave Kent its reputation as the “Garden of England”, particularly for fruit and hop growing.

Source: Natural England Agricultural Land Classification mapping; national planning policy **[add reference]**.

Relevance: This is not simply undeveloped land: it is a finite, highly productive agricultural resource. The Plan should demonstrate that its loss has been properly assessed and justified, including reasonable alternatives and the cumulative loss of Grade 1 and Grade 2 farmland (Not Justified / Consistency with National Policy).

F. Settlement Separation

Evidence: The remaining countryside between Teynham, Lynsted and Bapchild provides physical separation between settlements and contributes to their individual identity and rural setting.

Source: Local Plan countryside-gap evidence and mapping.

Relevance: Countryside-gap boundaries need to provide effective and lasting protection against settlement coalescence as development takes place (Not Justified).

(End of Submission)