

APPLICATIONS RELATING TO LAND TO THE SOUTH AND EAST OF SITTINGBOURNE, KENT AND LAND TO THE WEST OF TEYNHAM, KENT

S.77 TOWN AND COUNTRY PLANNING ACT 1990

Outline Planning Application for the phased development of up to 97.94 hectares at Highsted Park, Land to West of Teynham, Kent, comprising of. Demolition and relocation of existing farmyard and workers cottages. Up to 1,250 residential dwellings including sheltered / extra care accommodation (Use Class C2 and Use Class C3), up to 2,200 sqm / 1 hectare of commercial floorspace (Use Class E(g)). Mixed use local centre and neighbourhood facilities including commercial, business and employment floorspace (Use Class E) non-residential institutions (Use Class F1) and local community uses (Use Class F2) floorspace, and Public Houses (Sui Generis). Learning institutions including a primary school (Use Class F1(a)), open space, green infrastructure, woodland and community and sports provision (Use Class F2)). Highways and infrastructure work including the completion of a Northern Relief Road: Bapchild Section, and new vehicular access points to the existing network, and associated groundworks, engineering, utilities and demolition works (“the Northern Site”).

And

Southern Site. Outline Planning Application for the phased development of up to 577.48 hectares at Highsted Park, Land to the South and East of Sittingbourne, Kent, comprising of up to 7,150 residential dwellings including sheltered / extra care accommodation (Use Class C2 and Use Class C3). Up to 170,000 sq m / 34 hectares of commercial, business and service / employment floorspace (Use Class B2, Use Class B8 and Use Class E), and including up to 2,800 sq m of hotel (Use Class C1) floorspace. Up to 15,000 sq m / 1.5 hectares for a household waste recycling centre. Mixed use local centre and neighborhood facilities including commercial, business and employment floorspace (Use Class E), non-residential institutions (Use Class F1) and local community uses (Use Class F2) floorspace, and Public Houses (Sui Generis). Learning institutions including primary and secondary schools (Use Class F1(a)). Open space, green infrastructure, woodland, and community and sports provision (Use Class F2(c)). Highways and infrastructure works including the provision of a new motorway junction to the M2, a Highsted Park Sustainable Movement Corridor (inc. a Sittingbourne Southern Relief Road), and new vehicular access points to the existing network; and associated groundworks, engineering, utilities, and demolition works (“the Southern Site”).

PINS REFERENCES: APP/V2255/V/24/3355313 AND APP/V2255/V/24/3355314

43.5.2 PROOF OF EVIDENCE OF JULIEN SPEED – COMMUNITY ISSUES

ON BEHALF OF TEYNHAM & HIGHSTED COMMUNITY ACTION GROUP

A RULE 6 PARTY

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I, Julien Speed of Cherry Gardens, Nouds Lane, Lynsted, will say as follows:

1. Introduction

1.1 I provide this Proof of Evidence on behalf of Teynham & Highsted Community Action Group (“the Action Group”) and in support of the Action Group’s objections to these planning applications.

1.2 I believe the facts and matters set out in this proof of evidence to be true. When I refer to information supplied by others, the source of that information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

1.3 To be clear, I do not have any professional qualifications in respect of planning matters.

1.4 I have lived in Lynsted for nearly 30 years. I have been a parish councillor since 2018 and was elected Chairman of Lynsted with Kingsdown Parish Council in 2020. I am also a ward councillor for Teynham & Lynsted on Swale Borough Council. For the avoidance of doubt, I am not speaking on behalf of Swale Borough Council, but on behalf of the residents who have elected me to represent them.

1.5 I am my Parish Council's nominated representative on the Teynham & Highsted Community Action Group, a consortium of five Parish Councils comprising Doddington, Lynsted with Kingsdown, Newnham, Teynham, and Tonge. The Action Group has raised over £30,000 from local residents and community groups to fund legal representation and expert witnesses at this Inquiry. This is in addition to the £44,000 raised (at the time of writing) by the Five Parishes Group (who have been established far longer). The extent to which funds have been raised demonstrates the depth of feeling in the community against this proposed development.

1.6 To prepare this Proof of Evidence I have drawn on representations made by individual members of the public but have not included consultee comments from statutory bodies such as Kent County Council or Southern Water (except where stated). Having considered these representations from members of the public, I have incorporated my own views and experiences into what follows.

1.7 The source of my evidence is primarily the comments submitted by residents on the Planning Public Access portal at <https://pa.midkent.gov.uk/online-applications/> hosted jointly by Swale and Maidstone Borough Councils, supplemented by feedback received at public consultation sessions.

1.8 Appendix A summarises the engagement with the community by our five parish councils. It was the strength of feeling expressed at these meetings and in the written submissions that persuaded us to form the Action Group.

1.9 The charts in Section Two of this Proof provide a quantitative analysis of the overall comments made in opposition to (and in support of, for comparison purposes) the **Northern site**.

1.10 The qualitative analysis that follows in subsequent sections focuses on objections to the **Northern site**, this being the area with which I am most familiar and within which I live and serve as both a Borough and Parish Councillor. Each of these sections presents a key issue of concern, supported by:

- A summary of resident objections (quantified and categorised),
- A description of key themes raised,
- And where applicable, cross-references to relevant policies in the National Planning Policy Framework (NPPF December 2024) and the Swale Local Plan (Bearing Fruits 2031).

1.11 I have incorporated both objections that represent matters of subjective concern and those that relate directly to breaches of planning policy or evidence-based constraints.

1.12 The intention of this document is to ensure that the voices of residents are clearly heard, organised, and situated within the planning framework that the Inspector has to consider and follow.

1.13 To ensure a comprehensive, transparent, and accurate analysis of public feedback, I have used artificial intelligence (AI) provided by OpenAI's ChatGPT to review and categorise all 4,080 pages (in a combined PDF) of public comments submitted across the four rounds of consultation. This tool has been applied to:

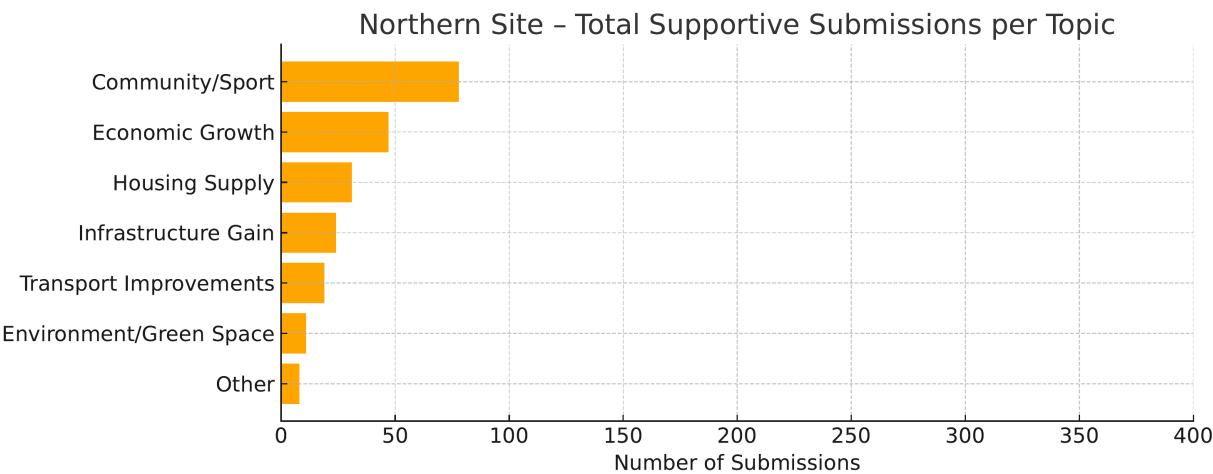
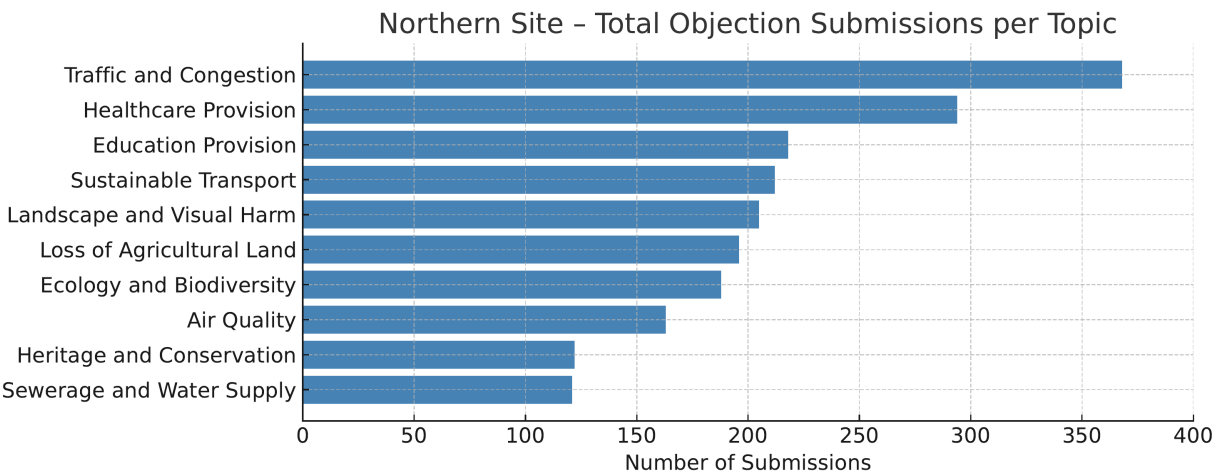
- Identify objections raised by individual residents (excluding duplicates and support comments),
- Classify objections into key planning themes,
- Count both the total number of objections per topic (volume of concern) and the number of individual objectors per topic (breadth of concern).

1.14 While AI provided the initial categorisation, I did not rely on this alone. I continuously refined the analysis, cross-checked it against the raw data, and reviewed it to ensure accuracy, relevance and correct topic attribution.

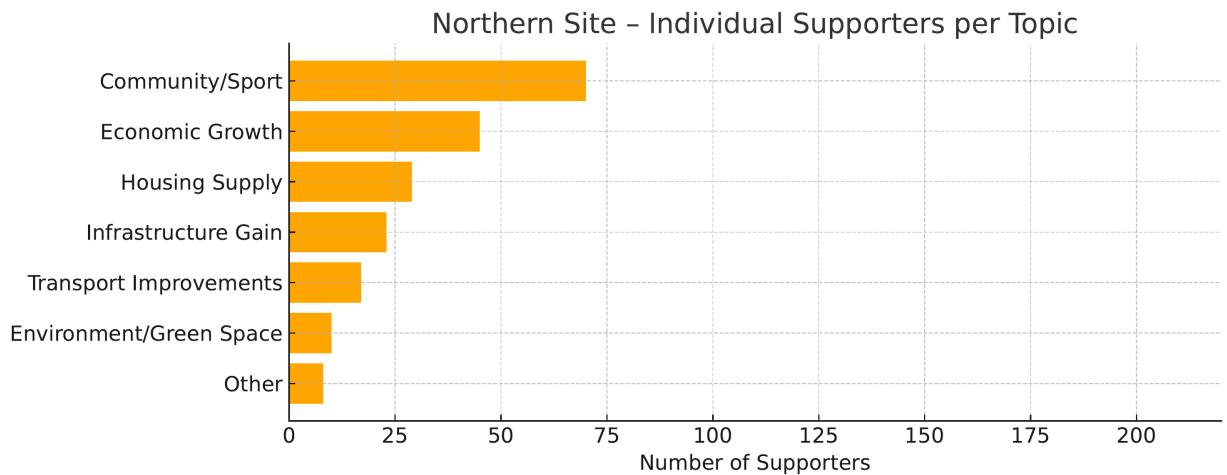
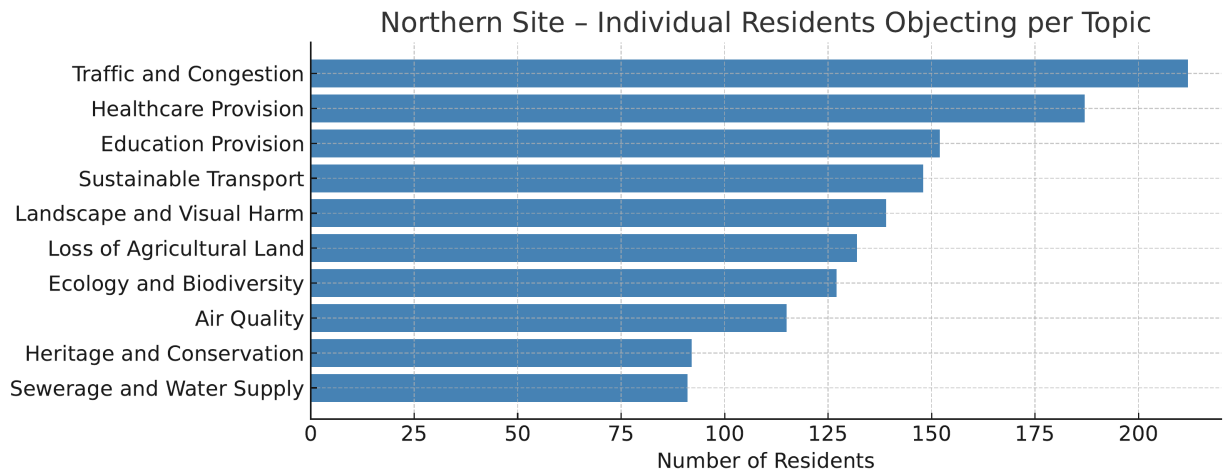
2. Overview of Community Responses to the Northern Site

2.1 The volume and breadth of community engagement with the Northern site application has been substantial. The total number of objection arguments raised across all the main topic submissions was 2,087 - as shown in the table at 2.2 below. The sum of the objectors for the 10 key areas of concern was 1,395 residents (see para 2.3). By contrast, only 218 points were made in support of the Northern site, representing 202 residents.

2.2 Total Submissions by Topic – Objections vs Support:



2.3 Individual Residents by Topic – Objections vs Support:



2.4 In addition to this disparity in volume, there was a marked difference in the character of submissions. The vast majority of objection letters (82%) were personalised and independently composed, whereas a large proportion of support letters followed pre-written templates.

2.5 Objection letters showed considerable variation in language, format and detail, often reflecting the personal experiences and concerns of residents. Many submissions included maps, photographs, traffic data, and personal testimonies about the area's infrastructure, environment and services.

2.6 Some letters did contain similar phrasing or recurring points, suggesting informal coordination among local networks or residents drawing from shared campaign materials. These are best described as "clustered objections using shared phrasing" — submissions that were not identical, but reflected common wording or structure. Unlike

template submissions, they still bore the hallmarks of individual authorship and personalisation.

2.7 A small number of objection submissions (approximately 18%) were identified as template-based. These included:

- The "Save Our Countryside" campaign: a short-form objection circulated among households, often signed but otherwise identical.
- Copies or variations of the "Stop Highsted" objection flyer, circulated by the Action Group

2.8 In contrast, two-thirds of all support submissions were template-based (64%). Just one-third (34%) of support submissions were personalised.

2.9 One template was provided by Sittingbourne Football Club. It included wording as follows: *"I am writing to support the Highsted Park proposal. The plans include much-needed facilities for Sittingbourne FC which will benefit the whole community, particularly young people. This development will bring jobs, investment, and new homes to the area."* This exact wording, or very close paraphrasing, was submitted by dozens of individuals, often with only minor edits (e.g., a name or short personalised sentence added at the start or end).

2.10 A second template was provided to businesses by the Applicant and included: *"As a local business owner, I believe Highsted Park represents a vital opportunity for growth in our region. The new housing will increase our customer base, and the infrastructure improvements will enhance accessibility for staff and clients. I urge Swale Borough Council to approve the application."* Again, this language appeared across multiple submissions, with some business owners merely signing their names to the letter without alteration.

2.11 This evidence demonstrates that support for the Northern site was not only far smaller in volume but was also more reliant on organised template campaigns - whereas objection responses were both higher in volume and largely self-authored, providing a broader, more representative view of community opposition.

2.12 In a separate exercise, I submitted a Freedom of Information (FOI) request to the Department for Levelling Up, Housing and Communities (DLUHC) requesting sight of correspondence with the Secretary of State concerning the Highsted Park planning application. Analysis reveals that at least 20 separate letters or emails were submitted to DLUHC expressing support and requesting 'call in'.

2.13 At least 13 of the submissions closely mirror a common template. These letters focus on themes such as 'regeneration of Sittingbourne town centre', 'community benefit', and 'investment in sport and leisure'. Many include identical or near-identical phrasing. The likely origin of this template is Sittingbourne Football Club, whose members and affiliates are heavily represented among the signatories.

2.14 Supportive letters from local businesses reiterate identical claims about Highsted Park's economic and community benefits. The uniformity of language and structure

across these submissions indicates a coordinated lobbying effort by the applicant. Indeed, I possess a copy of this template letter.

2.15 The letter submitted by Kevin McKenna MP is printed on official Commons notepaper, but a detailed textual comparison shows that significant portions are lifted from the same promotional template attributed to Sittingbourne FC and material circulated by the Applicant. Phrases such as “once-in-a-generation regeneration opportunity” and references to economic uplift mirror multiple other letters. This strongly suggests coordination or pre-drafting by external parties rather than original authorship by the MP.

2.16 The correspondence reviewed under this FOI request provides further evidence that support for the Highsted Park application included a substantial element of organised campaign activity, featuring repeated use of standardised templates and promotional phrases. This stands in contrast to the more individualised and personalised nature of the objections submitted to the local planning authority.

2.17 Finally, below is a comparative analysis of public engagement volumes submitted in response to large-scale residential planning applications across the UK. The purpose is to contextualise the scale of public engagement with the combined Highsted Park development proposal. All examples included are individual planning applications (not Local Plans) and the submission figures are taken from local media reports.

Development Site	Proposed Homes	Submissions	Year(s)
Highsted Park (North + South)	8,400	2,417	2022–2025
Mayfield Market Towns (Sussex)	10,000	~1,000	2014
Long Marston Garden Village (Warwickshire)	3,500	~1,200	2016
Mountfield Park (Canterbury)	4,000	~1,000	2016
Shinfield (Reading)	3,500	~450	2011–2015
Welborne Garden Village (Hampshire)	6,000	~850	2015–2020

2.18 The volume of engagement with the Highsted Park proposals is significantly higher than comparable developments across the UK. Given the overwhelming majority of objectors, it stands out as potentially one of the largest volumes of opposition to a single planning application.

3. Traffic and Congestion

3.1 The proposed development of 1,250 dwellings on the Highsted Park Northern site has generated extensive concern among local residents regarding the impact on traffic and highway safety. This issue attracted the highest volume of objections in the consultation process. A total of **368 objection submissions** raised concerns relating to traffic and congestion, **submitted by 212 individual residents**.

3.2 The volume of opposition on highways grounds was a key factor in our decision to instruct Mr Bruce Bamber of Railton TPC Ltd as an expert witness. Our limited resources meant we were unable to instruct experts in every field of concern.

3.3 The objections were wide-ranging in detail and spanned all four rounds of consultation. A recurring concern was the existing pressure on the A2, A249, and the local road network serving Teynham, Bapchild, and surrounding rural lanes. Residents expressed scepticism about the feasibility of accommodating additional vehicle movements arising from the development, citing already congested conditions during peak hours.

3.4 Multiple residents highlighted the cumulative impact of other developments in the Sittingbourne and Faversham areas where planning permission has been granted but construction has not yet commenced. Several noted that traffic modelling used by the applicant failed to reflect the lived reality of local road use - underestimating congestion, queue lengths and journey delays.

3.5 Particular reference was made to:

- The A2 corridor being already at or beyond capacity at key junctions, particularly through Teynham and Bapchild.
- The proposed new spine road through the North site will not only serve to provide access to the A2 but also to Lower Road, Teynham. The Northern section of Hempstead Lane that remains open and has a junction on the new Bapchild bypass provides a further direct route for drivers to use to access Lower Road to avoid the A2, thereby causing congestion of the constrained Lower Road.

3.6 Residents also raised safety concerns, particularly in relation to the volume and speed of traffic on rural lanes such as Lynsted Lane and Cellar Hill, which are not designed to accommodate high volumes or HGV movements. The risk to pedestrians, cyclists, and horse riders was cited repeatedly. Vehicles turning right into Lynsted Lane quite often lead to queues on the A2 eastbound as drivers sometimes have to wait for a gap in oncoming traffic. Increased use of Lynsted Lane will worsen congestion in Teynham with the knock-on effect of greater rat-running along Lower Road.

3.7 A number of objections noted the lack of certainty or commitment regarding the delivery and timing of transport infrastructure upgrades. There was significant doubt that proposed improvements would be delivered in step with housing occupation or would sufficiently mitigate the volume of development proposed.

3.8 Several residents also challenged the sustainability of a development so heavily reliant on private vehicle use. Despite references to new bus services and walking/cycling routes in the applicant's documentation, objections consistently argued that the site's location and local road context would lead to high car dependency.

3.9 Paragraph 116 of the NPPF states that "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios." In the light of resident feedback, the Action Group believes that the development should be refused on the grounds of residual cumulative impacts - particularly given the planning permissions already granted/built out at Spring Acres (580 dwellings), Tonge (390), Frognal Lane (300 plus 26,840 sqm commercial), Blossom Grove (130) and Lynsted Lane (10).

3.10 Paragraph 110 of the NPPF states that "significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes". Objections consistently pointed to the site's poor location in terms of public transport links and the over-reliance on car use, contrary to this objective. I refer you to the Proof of Evidence of Mr Bamber at CD 43.4.2

3.11 The existing road structure around Teynham and particularly the A2 is not capable of accommodating combined development traffic from 8,400 new homes across the two sites. The A2 is already over capacity and adding additional traffic to the road would exacerbate the existing congestion problems. The Transport Review document highlights that the assessment of transport environmental impacts in both applications has underestimated the sensitivity of Lower Road and the A2 through Teynham and further east and thus underestimated the predicted significance of the adverse impacts resulting from the proposals. Furthermore, the report also highlights the lack of any mitigation offered for the increase in HGV traffic along the A2 which is recognised in the applications and increased potential for rat-running along Lower Road because of increased delays along the A2.

3.12 With regard to the northern site, the application suggests that the completion of the NRR would relieve traffic pressure on the A249 and M2 but would increase traffic on the A2 to the east, if only the Northern site is granted. Residents strongly disagree that additional traffic being routed through the A2 rather than through the A249 and the M2 is a preferable position given the capacity of the A2 by comparison. The impact of channelling the additional traffic directly into the A2 would cause unacceptable additional burden on a road that is already recognised to be operating at capacity.

3.13 First-hand experience of traffic congestion endured by residents is summarised by the following quotes, extracted from objection letters submitted to the Council's planning portal:

3.14 *“The existing infrastructure is already struggling. The A2 through Teynham regularly backs up during rush hour and weekends. If there’s a problem on the M2, the entire village becomes a rat run with Lower Road completely gridlocked.”* — Resident of Station Road, Teynham

3.15 *“I already avoid using the A2 during peak times. If this development goes ahead, the only option left will be to rat-run along Lower Road and other rural lanes, which will be dangerous and unsustainable.”* — Resident of Barrow Green, Teynham

3.16 *“The A2 is over capacity now. With all the new houses already approved at Spring Acres, Tonge and Frognal, I don’t know how the road network is supposed to cope. We already see cars diverting down Lower Road, which isn’t built for the volume of traffic it’s now getting.”* — Resident of Lower Road, Teynham

3.17 *“HGVs regularly use Lower Road as a cut-through, and with the A2 gridlocked, it’s only going to get worse. This will make it more dangerous for children walking to school or cyclists trying to get to work.”* — Resident of Cellar Hill, Lynsted

3.18 *“You only have to drive along the A2 between Bapchild and Teynham at 8am or 5pm to know this development is madness. You sit in traffic for 10–15 minutes just to get to the lights. Add thousands more cars? It’ll be unworkable.”* — Resident of Bapchild

4. Healthcare Provision

4.1 A total of **294 objections** were received from residents relating to healthcare provision, submitted by **187 individual objectors**. This issue was one of the most frequently raised concerns across all rounds of consultation for the Northern site.

4.2 Residents expressed strong concern about the already limited availability of GP appointments in the area, and questioned how local services could absorb the additional pressure generated by 1,250 new dwellings on the Northern site and 8,400 dwellings on the combined site (which equates to over 19,000 new patients) . Objections cited long waiting times, difficulty registering with local practices, and a lack of new planned provision in step with development.

4.3 Particular emphasis was placed on the relocation of the Medic Care Surgery from Teynham to the Sittingbourne Memorial Hospital. This move has made it significantly harder for Teynham residents—especially those without access to a car—to access primary care. Residents noted that public transport links to Sittingbourne Memorial are poor, and that car parking at the new location is limited and difficult. Other surgeries are either overstretched due to additional housebuilding and concomitant population increase or, in the case of Faversham practices, Teynham is outside their catchment area.

4.4 Residents frequently cited the very poor GP-to-patient ratio in Swale. The most recent available data (*NHS England General Practice Workforce, 28 February 2025*) shows that the Medic Care Surgery ranks 166th out of 176 Kent practices, with a ratio of 4,056 patients per GP. By contrast, the national average is approximately 0.75 GPs (0.58 FTE) per 1,000 patients - equivalent to 1,720 patients per GP. The number of patients per GP in Swale is amongst the highest in the country. Residents of Teynham registered at the Medic Care Surgery find themselves nearly at the bottom of the league table for Kent.

4.5 This crisis in primary care capacity has its roots in national GP recruitment shortages, but which are particularly acute in Swale, with many practices struggling to attract or retain staff. Residents noted that the developer's proposals do not secure or adequately fund any guaranteed increase in healthcare provision, and that any future provision is speculative.

4.6 The population of Swale increased by 11.7% between 2011 and 2021, rising from 135,800 to approximately 151,700—far above the national average of 6.6% and the South-East average of 7.5%. [*Office for National Statistics – Census 2021 data*]. Despite this, GP provision has declined.

4.7 Several objections referred to an inability to secure timely GP appointments, leading to increased reliance on A&E departments. This displacement of pressure from general practice to acute care was described as unsustainable.

4.8 A number of residents referred specifically to pressure on Medway Maritime Hospital in Gillingham, the main acute and emergency care facility serving the Teynham area. They described existing delays at A&E, rising ambulance response times, and

overcrowding in wards. Residents were concerned that if GP access continues to deteriorate, more people will resort to emergency services, worsening conditions at Medway Maritime. The hospital is already under significant strain and lacks the resilience to accommodate the additional demand that would arise from 1,250 (or indeed 8,400) new homes – a population increase of up the 20,000 new residents - without a corresponding investment in healthcare infrastructure.

4.9 These objections raise valid concerns about the application's ability to comply with paragraph 20 of the National Planning Policy Framework (NPPF), which states that strategic policies should make sufficient provision for community facilities such as health infrastructure.

4.10 Swale Local Plan Policy CP5 sets a commitment to bringing forward community facilities and services including healthcare. Timely infrastructure is imperative in view of the significant shortfall in healthcare service in the Teynham locality.

4.11 We note the proposal to provide a medical centre in the mixed-use area to the West of Teynham. However, at this stage we have no information as to how this medical centre will be provided and by whom. A commitment to build facilities as part of a planning application does not necessarily mean they will be delivered if the funding and resources are not forthcoming from the ICB towards staffing and running them. It is clear from another large-scale development at Froggnal Place in Teynham which has been approved recently, that endeavours to safeguard land for a medical centre were not backed up with commitment to build in the associated s.106. Teynham urgently needs a new medical practice and we require from a development of this scale, not only commitment to safeguard land for the purpose, but also commitment to build, equip, staff and operate it.

4.12 The current proposed funding in the draft CIL Compliance Statement is inadequate across all key health care fronts - primary, urgent, and acute. Additional funding must be allocated to meet the real health care needs generated by this development.

4.13 The £1.5 million allocated for primary care if only the northern site proceeds is insufficient. This figure is predicated on a percentage of the combined site cost requirement (15%) purely based on the percentage of dwellings that the Northern site represents - but it does not reflect the real cost of establishing a new primary care facility. Based on experience with negotiations over the Froggnal Place development in Teynham - where land is technically allocated for a healthcare facility but no plans have been put forward - the actual set up cost is in the region of £3million to £4 million.

4.14 Sittingbourne urgently needs an Urgent Treatment Centre prescribing unit. The Minor Injuries Unit (MIU) in Sittingbourne cannot issue prescriptions, placing unnecessary pressure on other parts of the system. In contrast, the Urgent Care Centres in Sheerness and Faversham do have prescribing capabilities. This inconsistency is already both inefficient and inequitable for local residents but will require residents of Highsted Park to also travel to either the Isle of Sheppey or Faversham – placing a further burden on those services.

4.15 Acute care at Medway Maritime Hospital is already at capacity. It frequently operates at 97% occupancy in its in-patient beds and has lengthy waits for treatment. The proposed development will only increase this burden. Funding required by the NHS is £4.335 million if the Northern site is approved. NHS Kent & Medway have confirmed that the additional demand generated by future residents will require a physical expansion of facilities. The three principal sources of NHS funding are not available for the capital investment required for the additional floorspace. However, the applicant has stated there is no legal justification for the developer to pay any s.106 contribution towards the cost of providing acute care. It is imperative this impasse is resolved, otherwise the development cannot be allowed to proceed on these grounds alone.

4.16 Residents' first-hand accounts reveal the current strain on healthcare services, particularly the impact of the closure of the Teynham surgery, the relocation of Medic Care to Sittingbourne, and pressure on acute services at Medway Maritime Hospital. These concerns highlight the perceived risks of worsening conditions if the development proceeds. These quotes are again extracted from letters of objection submitted to the SBC planning portal.

4.17 *"The Teynham surgery was within walking distance for many elderly and vulnerable residents. Since it was relocated, I've had to ask neighbours for lifts to Sittingbourne or face long, unreliable public transport journeys. I can't imagine how older residents are coping."* - Resident of Station Road, Teynham

4.18 *"I spent 45 minutes on hold just to be told there were no GP appointments left for the day. When I asked about advance booking, they said I had to try again the next morning. It's a constant loop."* - Resident of Teynham

4.19 *"Parking at the Memorial Hospital is dreadful. My last visit for a routine check-up involved circling for 20 minutes, and I was late for my appointment. If the Highsted development is approved, things will only get worse."* - Resident of Cellar Hill, Lynsted

4.20 *"In December, my teenage son needed urgent care, and we waited over 6 hours at Medway A&E. People were being treated in corridors. That was before these thousands of extra houses are even built."* - Resident of Bapchild

4.21 *"This area can't cope now. GP services are patchy, and Medway Hospital is on its knees. Approving Highsted Park without proper healthcare provision is grossly irresponsible."* - Resident of Doddington

5. Education Provision (including SEND)

5.1 A total of **218 objections** were received from residents concerning education provision, including **152 individual objectors**. This was one of the most consistently raised themes across all consultation rounds, particularly in relation to pressure on primary school places, secondary school admissions, and lack of SEND capacity.

5.2 Residents expressed serious concern that the proposed 1,250 new dwellings on the Northern site would exacerbate existing pressures on school capacity in the area. Many noted that local schools, including Teynham Primary, Lynsted and Norton Primary, and Sittingbourne secondary schools such as Fulston Manor and Westlands, are already oversubscribed. Several objections included personal accounts of families struggling to secure places for their children at local schools.

5.3 Particular concern was raised regarding the provision of school places for children with Special Educational Needs and Disabilities (SEND). Residents noted that local SEND provision is already inadequate and that parents often have to send their children long distances, including out of borough, to access suitable education. The lack of any specific commitments in the application to address SEND provision was highlighted as a serious omission.

5.4 One resident provided detailed commentary on the extreme pressure facing local secondary and special school places. They noted that the three secondary schools nearest the site are already oversubscribed, and that one has introduced postcode-based admissions criteria to manage demand. One of these is a special school for pupils with severe and complex needs, and its proximity to the development site may give children from the new estate priority over others in the county. The resident cited serious concerns about the ability of Kent County Council to meet existing SEND responsibilities, highlighting Ofsted and CQC findings from 2019 that concluded “too many children and young people with SEND do not get the support they need in Kent.” A 2022 revisit found insufficient progress, and in March 2023 the Secretary of State issued an Improvement Notice due to continued failure in addressing the nine areas of concern. The resident argued that the proposed development includes no provision for special schools, and that its proximity to an ‘Outstanding’-rated special school could create further distortion in admissions patterns, exacerbating existing shortfalls. They expressed strong opposition to the scheme on the grounds that it would worsen SEND access in an area already identified as underperforming by national regulators.

5.5 Some objections questioned the timing and certainty of any new school infrastructure. Although the applicant’s materials reference land for a potential new primary school, residents were sceptical that it would be delivered in time to meet the needs generated by the first phases of development. Concerns were also raised about the absence of any secured funding or delivery timetable for secondary school places.

5.6 Residents referenced the cumulative impact of multiple large-scale developments across Swale and the inability of existing school infrastructure to cope. Some noted that

reliance on developer contributions through Section 106 agreements is often insufficient to deliver new schools at the pace required.

5.7 Objections on this issue are supported by paragraph 100 of the National Planning Policy Framework (NPPF, revised December 2024), which states that: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities.' The Framework also directs that local planning authorities should work proactively with education providers and give great weight to the need to create, expand or alter schools. This applies with equal force to the provision of SEND infrastructure.

5.8 Swale Local Plan Policy CP6 requires that development proposals support community services and infrastructure and ensure timely provision in step with new housing. Policy CP5 stresses the importance of reducing the need to travel by providing services close to where people live. The failure of the application to provide for early, assured, and adequate education infrastructure places it in conflict with both policies.

5.9 Residents shared on the Council's planning portal specific first-hand experiences highlighting the acute pressure on local schools, the uncertainty around promised infrastructure, and the difficulties faced by families in accessing appropriate education — particularly at secondary and SEND levels:

5.10 *"We were allocated a school place for our son in Sittingbourne, nearly 3 miles from our home in Teynham. There's no direct bus, so I now have to drive him each morning, adding to congestion. Local schools were full — we had no say in the matter."* – Resident of Station Road, Teynham

5.11 *"There are already waiting lists for most schools around here. My daughter didn't get a place at the village school despite living five minutes away. We were told to try again next year or take a space across town. That's not sustainable."* - Resident of Greenstreet, Teynham

5.12 *"They say a new primary school will be built 'eventually', but what about the first wave of families moving in? These places will be filled before the infrastructure is even agreed. The timing doesn't match up."* - Resident of Frogmal Lane, Teynham

5.13 *"I work in a local school — we're already overstretched. We've had to convert a library into a classroom and still turn families away. Adding over 1,000 more homes without concrete school plans is reckless."* - Resident of Cellar Hill, Lynsted

5.14 *"Our son has complex needs and was offered a place 17 miles away because the local SEND school had no space. We're barely managing as it is — if the new development puts even more pressure on SEND schools, others like him will be pushed even further out."* - Resident of Tonge

6. Landscape and Visual Harm

6.1 A total of **205 objection submissions** raised concerns relating to landscape and visual harm in the area of the Northern site, submitted by **139 individual residents**. This topic emerged as a prominent area of concern, particularly from those living in proximity to the development boundary or within valued countryside views.

6.2 Many residents objected on the grounds that the proposals would result in the loss of open countryside and the destruction of an attractive, predominantly rural landscape. Particular emphasis was placed on the closing of Important Local Countryside Gaps, currently defined by open fields, hedgerows and trees. Objectors expressed concern that the development would lead to the physical and visual coalescence of settlements, eroding their distinct identities and harming the setting of the countryside.

6.3 Neither application accords with the adopted settlement hierarchy. Both lie within the countryside, and within the designated Important Local Countryside Gaps. The proposals in each application would fail to accord with Local Plan policies ST1, ST3 as they relate to settlement hierarchy and DM25 as it relates to protecting Important Local Countryside Gap areas.

6.4 Residents also highlighted the importance of PROWs ZR195, ZR256, ZR257, ZR191 and ZR192 (amongst others) for daily exercise, accessing different parts of the villages and mental wellbeing. Objections referred to the loss of visual amenity and tranquility currently experienced by walkers and local residents using these routes.

6.5 There were repeated references to the Borough Council's Landscape Sensitivity Assessment, which identifies large parts of the Highsted North site as being of 'high sensitivity' to change. Residents noted that this evidence base formed part of the Local Plan Review process and argued that it should be given significant weight in determining the application.

6.6 The NPPF requires that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. Residents argued that this requirement had not been met by the application.

6.7 The Area of High Landscape Value contained within 21/503906/EIOU'T and on the edge of 21/503914/EIOU'T would be degraded and the conservation objectives of maintaining "remoteness" within these areas would be totally compromised. The setting of the Kent Downs National Landscape will experience harmful change by 21/503914/EIOU'T and adverse recreational impacts will be experienced within the protected area. Amendments have been made to both applications to add localised areas of additional landscape planting. These amendments do nothing to further mitigate the significant impact each will have on the special qualities of the landscape character in both locations.

6.8 Para 189 of the NPPF states that “great weight should be given to conserving and enhancing landscape and scenic beauty in ... National Landscapes which have the highest status of protection in relation to [conserving and enhancing the natural environment]”. A new motorway junction is clearly in contravention of this stipulation.

6.9 Residents also contended that the proposed development would be inconsistent with Policy DM24 of the adopted Swale Local Plan, which seeks to conserve and enhance the quality, character and amenity value of the borough’s landscapes, and to avoid significant adverse impacts on designated and locally valued landscapes.

6.10 Detailed comments on the planning portal from residents included:

6.11 *“It would result in the coalescence of villages, contrary to the recommendations included in a report commissioned by SBC and published in January 2021 which identified an ‘Important Countryside Local Gap’ which should be maintained between parishes, rather than their being engulfed by extensive developments....The loss of local countryside gaps between settlements and the urban spread from Sittingbourne will lead to the loss of the open and undeveloped character of the greenfield land... and the loss of village communities.”* – Resident of Cellar Hill, Lynsted

6.12 *“These applications... will result in the amalgamation of several rural villages... This will cause a fundamental and irreversible change in the character of the countryside... The Swale Local Plan adds more importance to the maintenance of Countryside Gaps and separation of settlements... The identity, character, and setting of settlements are formed, in part, by their physical separation from one another.”* – Resident of Station Road, Teynham

6.13 *“The loss of this dark sky is an important factor... Visitors regularly comment on the ability to see constellations here, something no longer possible in many parts of the UK. Lighting from thousands of homes and a new motorway junction would permanently erase this feature of our local landscape, degrading not only its visual quality but also its tranquillity and sense of remoteness.”* – Resident of Wormshill

6.14 *“These proposals will cause the irreversible merger of rural villages into a single urban sprawl. The coalescence of Teynham, Lynsted, Rodmersham and Tonge - currently separated by open countryside - will erase their historic identities. The Local Plan clearly identifies the need to maintain Countryside Gaps, yet this development appears determined to ignore them.”* – Resident of The Vallance, Lynsted

6.15 *“During the pandemic lockdowns, the fields and paths between our hamlets and communities became vital to our wellbeing—walks, space, sky, birdsong. These areas offer a green lung for local people. Losing them to concrete and rooftops would be an incalculable loss, not just to visual amenity but to health and heritage.”* – Resident of Cellar Hill, Lynsted

7. Sustainable Transport Failings

7.1 The Northern site attracted **212 objection submissions** raising concerns about sustainable transport, from **148 individual residents**. The volume and breadth of comments underscore widespread community scepticism over whether the proposals align with sustainable transport principles as set out in national and local planning policy.

7.2 Many residents raised concerns that the proposed development is heavily reliant on private vehicle use and fails to promote a credible shift towards sustainable transport modes such as walking, cycling, and public transport. The site's location was described as detached from high-frequency transport hubs, with limited viable alternatives to car use for work, education, shopping or healthcare.

7.3 A number of objectors highlighted the absence of meaningful cycling infrastructure. Residents stated that while the application references 'active travel corridors', no practical or safe links exist to Sittingbourne, Teynham Station or employment areas. Objections pointed out that the A2 is a busy arterial road with constrained width and poor visibility, making it dangerous for cyclists. The lack of segregated cycle lanes and unclear commitments to new infrastructure were cited as key failings.

7.4 Public transport accessibility was a consistent concern. Many residents described existing bus services as infrequent, unreliable or already under pressure. Some noted that the nearest bus stops are too far from large parts of the proposed site to be a realistic alternative to car travel, particularly for elderly or mobility-impaired residents. Others expressed concern that the anticipated modal shift was not backed by firm agreements with service operators.

7.5 Objections also referenced the difficulty of accessing Teynham Railway Station on foot or by bicycle, especially from the eastern and southern parts of the site. Narrow pavements, busy road crossings, and long distances were cited as barriers to encouraging rail-based commuting. Some respondents questioned whether Network Rail or Southeastern had been meaningfully consulted.

7.6 Paragraph 117 of the National Planning Policy Framework (NPPF, December 2024) states that applications should give priority to pedestrian and cycle movements, address the needs of people with disabilities, and create places that are safe, secure and attractive. Residents argued that the application fell short of these objectives in both design and delivery.

7.7 Policy DM6 of the Swale Local Plan 2017 supports development proposals that deliver safe and convenient walking and cycling routes and integrate well with existing public transport services. Objectors stated that the development did not satisfy these expectations and would entrench car dependency in a rural context.

7.8 Further, the proposed sustainable transport strategy supporting both applications does not meet the objectives of Local Plan policy CP5 to promote options for transport which would improve health. It would not reduce or mitigate additional car travel arising

from 8,400 homes all of which are likely to use the A2 at some point for shopping and other journeys which cannot feasibly be made by public transport or on foot/cycle.

7.9 Several responses also challenged the realism of projected modal shift assumptions, suggesting that proposed interventions were too vague or too aspirational to affect meaningful behavioural change. There were repeated calls for a full Transport Impact Assessment and better evidence on how sustainable transport principles would be implemented and monitored.

7.10 Residents expressed deep scepticism that the development would enable a genuine shift towards sustainable transport. Their first-hand experiences are summarised in the following comments extracted from the planning portal:

7.11 *“I would love to cycle more, but it simply doesn’t feel safe. The A2 is a nightmare — cars are too fast, the road is too narrow, and there’s no protection for cyclists. Until that changes, people will keep using their cars.”* – Resident of London Road, Teynham

7.12 *“Buses are not a reliable option around here. They’re infrequent and don’t always run on time. The nearest bus stop to my home is a 20-minute walk — not realistic when you’re carrying shopping or travelling with small children.”* – Resident of Station Road, Teynham

7.13 *“Walking to Teynham Station is very unpleasant and, in places, dangerous. The pavements are narrow or missing, especially near the railway bridge. And traffic is constant. I’d never let my teenager walk that route alone.”* – Resident of Cellar Hill, Lynsted

7.14 *“Developers talk about ‘modal shift’ but ignore the reality that people don’t use buses or bikes here because the infrastructure just isn’t there. We’ll be stuck with even more cars, traffic, and pollution.”* – Resident of Frogna Lane, Teynham

7.15 *“Elderly residents like myself are effectively trapped if we don’t drive. There’s no guarantee we can rely on buses to get to medical appointments or the shops. And walking to a bus stop on uneven pavements isn’t feasible for everyone.”* – Resident of Lynsted Lane, Lynsted

8. Loss of Agricultural Land / Food Supply

8.1 A total of **196 objection submissions** raised concerns about the loss of agricultural land and the impact on food supply. These comments were submitted by **132 individual residents**. Many responses expressed alarm that high-quality farmland on the Northern site would be irreversibly lost to housing, at a time when national food security is becoming an increasingly urgent policy issue.

8.2 Several residents highlighted that the development would result in the loss of productive Grade 1 and Grade 2 agricultural land. Objections noted that Swale contains some of the best and most versatile farmland in the country and argued that its permanent loss would represent a strategic failure in the safeguarding of essential national resources.

8.3 The sentiment was expressed that Swale, and in particular the rural areas around Teynham, Lynsted and Bapchild, have historically made a substantial contribution to the UK's food production — particularly in fruit growing and arable farming. Residents pointed out that farmland of this quality is increasingly rare, and once built upon, cannot be restored.

8.4 Many objectors questioned the rationale for sacrificing land that actively contributes to food supply in favour of speculative housing development. Comments referred to the recent instability in global food markets and rising domestic prices, arguing that this context increases the imperative to protect productive land within the UK.

8.5 Paragraph 187 of the National Planning Policy Framework (NPPF, December 2024) states that planning policies and decisions should protect and enhance soils, and recognise the benefits of the best and most versatile agricultural land. Paragraph 192 also requires that decisions contribute to the protection of natural capital and ecological networks.

8.6 Further, the proposed developments do not meet the objectives of the NPPF to fully recognise and value the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile (BMV) agricultural land – land in Grades 1,2 and 3a classification. Both schemes involve development of BMV land, much of which is in the top 5% in England for production.

8.7 Residents also referenced the Swale Local Plan, particularly Policy DM31, which seeks to conserve agricultural land and avoid significant harm to its availability and quality. Policy DM31 only allows for development on agricultural land when there is an overriding need that cannot be met on land within the built-up area boundaries. Some residents asserted that the proposals were contrary to this policy objective, given the scale and location of the development on high-grade farmland.

8.8 Nor do the applications accord with Policy CP7. The proposals do not recognise or value the important part that the land within each application plays in providing wider services of food production.

8.9 CPRE Kent provided expert evidence to the Inquiry on 15 May 2025 underscoring the significant loss of Best and Most Versatile (BMV) agricultural land that would arise from this development. According to the applicant's own statement of case, 78.9 hectares (87.6%) of the Northern site comprise BMV land. For the Southern site, 88% of the area is classified as BMV, although no exact figure is provided. CPRE estimates the combined total BMV loss across both sites to be approximately 570 hectares.

8.10 The importance of this land is underscored by the Swale Local Plan, which states that 70% of Swale's 37,000 hectares of total land area is classified as BMV. This high-quality farmland plays a crucial role in national food security and environmental resilience. CPRE warns that the abundance of BMV land in Swale should not diminish its value; rather, its strategic role in ensuring sustainable food supply must be recognised.

8.11 CPRE further highlights that the application has failed to demonstrate a sequential assessment of lower-grade land alternatives — a key requirement of both local policy DM31 and the NPPF. The speculative nature of the application circumvents the proper strategic planning process that should occur through the Local Plan. As CPRE notes, this failure to justify the loss of such extensive BMV land sets a dangerous precedent and threatens the long-term viability of national agricultural resources.

8.12 CPRE concludes that this level of loss is entirely inappropriate outside of a properly-evidenced, plan-led process. The Inspector is urged to give greater than limited weight to this harm, given the scale of the land loss, its national significance, and the lack of compensatory benefit in terms of affordable housing or brownfield-first alternatives.

8.13 A number of responses criticised the lack of a robust agricultural land classification (ALC) survey and queried whether Natural England had been adequately consulted. Some called for independent soil and productivity assessments before any planning decision was taken.

8.14 There was also concern that the loss of farmland was being underestimated in the applicant's environmental documentation, with insufficient recognition of the cumulative impact of multiple large-scale developments across Swale on the borough's overall agricultural capacity.

8.15 Residents expressed deep concern over the permanent loss of high-quality farmland in Swale, particularly given its historic agricultural role and contribution to national food production. Their first-hand views include the following comments extracted from the planning portal:

8.16 *"This farmland is not just open space — it is some of the most productive land in the country. It's where we grow fruit that ends up in shops across the UK. Once it's gone, it's gone. Turning it into housing is short-sighted and reckless when food security is such a major issue."* – Resident of Lynsted Lane, Lynsted

8.17 *“The countryside between Teynham and Lynsted is prime Grade 1 farmland. My family have farmed this land for generations. The idea that this could be lost for good — just for unaffordable executive housing — is heartbreaking. We’re losing our ability to feed ourselves.”* – Resident of Station Road, Teynham

8.18 *“We grow fruit and arable crops here that help supply the country. The developers treat it as if it’s just empty land, but it’s not. It supports jobs, it feeds people, and it maintains a landscape that’s part of our identity. It should be protected, not built over.”* – Resident of London Road, Teynham

9. Ecology and Biodiversity

9.1 A total of **188 objection submissions** raised concerns relating to ecology and biodiversity. These came from **127 individual residents**, many of whom expressed alarm at the scale of habitat loss and the lack of credible mitigation in the proposed Northern scheme.

9.2 A recurring theme was the likely destruction of hedgerows, mature trees, and field margins that currently support a wide variety of species, including bats, owls, badgers, dormice, birds and reptiles. Residents noted that these habitats form important wildlife corridors across the site, connecting ancient woodland, designated Local Wildlife Sites, and watercourses.

9.3 Multiple objections stated that the development would fragment these corridors, severing habitat connectivity and placing pressure on already vulnerable species. Several comments noted that the site sits within an ecologically rich transition zone between the North Downs and the Swale estuary, amplifying the potential impact on biodiversity.

9.4 Residents criticised the application's biodiversity net gain (BNG) claims as poorly evidenced and based on assumptions rather than site-specific data. There was scepticism that on-site gains could offset the scale of habitat loss, and concern that off-site mitigation, where mentioned, was vague or uncommitted. Several objectors argued that the application fell short of the Environment Act 2021 requirement to deliver a minimum 10% net gain in biodiversity.

9.5 Paragraph 192 of the National Planning Policy Framework (NPPF, December 2024) states that planning decisions should ensure that new development results in net gains for biodiversity. Paragraph 193 also requires that development should avoid significant harm to biodiversity and, where this cannot be avoided, it should be mitigated or compensated. Residents argued that the proposals did not comply with either standard.

9.6 Residents also cited Policy DM28 of the Swale Local Plan 2017, which protects designated biodiversity assets and requires new development to conserve ecological features and avoid damage to locally important habitats. It was argued that the proposed development would directly impact these features and result in net harm rather than enhancement.

9.7 Some objectors raised concern about the absence of up-to-date ecological surveys and questioned whether seasonal variations and protected species had been adequately assessed. The risk of irreversible biodiversity loss was seen as insufficiently addressed in the Environmental Statement accompanying the application.

9.8 Finally, a number of residents expressed wider concerns about the cumulative ecological impact of multiple developments across the borough. They argued that while each scheme may be assessed in isolation, the broader effect on Swale's ecological network had not been properly considered.

9.9 Residents expressed particularly strong concern about the ecological richness of the area and the harm that would result from large-scale development. Their detailed comments include the following:

9.10 *“Our home sits beside a stretch of hedgerow and field margin that’s teeming with life — we regularly see owls, badgers, foxes, and bats in the garden. If this development goes ahead, those habitats will be bulldozed. No amount of ‘off-site mitigation’ can bring them back. Once gone, they’re gone forever.”* – Resident of Frogmal Lane, Teynham

9.11 *“The area behind our property forms a vital wildlife corridor connecting Cromer’s Wood to Highsted Wood. It’s not just trees and grass — it’s a habitat for dormice, slow worms and migratory birds. The developers seem to treat it as expendable land, but to us and to the wildlife it supports, it’s irreplaceable.”* – Resident of Swanstree Avenue, Sittingbourne

9.12 *“As someone who walks the fields daily, I’ve seen the diversity of species — kestrels hovering, bats at dusk, even rare butterflies in summer. It’s heartbreaking to think that all this could be lost. The ecological surveys were rushed and barely scratched the surface of what’s actually here.”* – Resident of Cellar Hill, Lynsted

9.13 *“The environmental documents claim a biodiversity net gain, but this is fantasy. They’re replacing 100-year-old trees and complex ecosystems with urban drainage ponds and grass verges. That’s not a gain — it’s greenwash.”* – Resident of Lynsted Lane, Lynsted

10. Air Quality

10.1 A total of **163 objection submissions** raised concerns about air quality. These came from **115 individual residents**. The majority of these objections focused on the already poor air quality along the A2 corridor, particularly through Teynham and into Sittingbourne, and the likely worsening of this situation if the Northern site were permitted.

10.2 Numerous objections noted that a section of the A2 in Teynham is already designated as an Air Quality Management Area (AQMA) and exceeds the levels recommended by the World Health Organisation of nitrogen dioxide and fine particulate matter (PM2.5). Residents raised concern that the additional traffic generated by the development, especially HGVs and private cars, would compound this issue, particularly in already congested areas like Station Road and London Road.

10.3 Several submissions made detailed reference to the Government's legally binding air quality targets under the Environment Act 2021 and the Environmental Improvement Plan 2023 and The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. These include a requirement to reduce the population's exposure to PM2.5 by 35% by 2040 compared to 2018 levels, with an interim target of 22% by the end of January 2028. There is also a legal requirement to achieve a maximum annual mean concentration of 10 µg/m³ of PM2.5 by 2040, with an interim level of 12 µg/m³ by 2028.

10.4 These foundation documents challenge local and national authorities to avoid cumulative increases of PM2.5 arising from all planning applications. To achieve this, applicants must demonstrate that mitigation measures are in place and that they are effective.

10.5 However, in Teynham—for those living, working or visiting the area, walking adjacent to the A2—mitigation is deemed impossible. This is due to friction particles being generated and recirculated in built-up areas, made worse by the demonstrated increases in vehicles arising from Highsted and other developments between Sittingbourne and Ospringe/Faversham.

10.6 Several objectors referred specifically to evidence compiled by Mr Nigel Heriz-Smith, a local resident and air quality campaigner. Mr Heriz-Smith submitted detailed modelling data from Imperial College and the Central Office of Public Interest, showing that PM2.5 levels in Teynham already exceed the 2028 interim target. His analysis highlights the potential for worsening exposure if Highsted Park proceeds [in addition to other Local Plan approvals in the pipeline between Faversham/Ospringe and Sittingbourne], which would result in levels far in excess of the legally binding 2040 target. The mitigation measures proposed were regarded as inadequate and would have little beneficial effect for the residents subjected to the adverse health effects of poor air quality.

10.7 It is my view that Mr Heriz-Smith has clearly demonstrated, through manual traffic counts from 24-hour video recordings, that daily traffic levels between 2019 and 2024 have increased in Teynham by 24%. Whereas, the national traffic figure for the same period is only 97% of the 2019 traffic. This marked contrast between national and local conditions, demonstrates that this local pattern of economic and residential behaviours between Sittingbourne and Faversham is deeply embedded.

10.8 The proposed mitigation measures are deemed largely inadequate, particularly since the most harmful PM2.5 emissions linked to increased traffic would be adjacent to the historic pattern of residences (predominantly set back only one or two meters from passing and congested traffic), businesses, and pedestrians. The approval of this application is projected to increase traffic significantly and worsen air quality for existing communities.

10.9 Fine particulate matter, especially PM2.5, is widely recognised as one of the most harmful forms of air pollution to human health. Unlike larger particles (PM10), PM2.5 can penetrate deep into the lungs and even enter the bloodstream. Long-term exposure is associated with increased rates of cardiovascular disease, respiratory illness, strokes, and lung cancer. The World Health Organisation and UK health authorities have repeatedly stressed that there is no known safe level of exposure to PM2.5, making any increase in levels a matter of significant public health concern—particularly for children, the elderly, and those with pre-existing conditions.

10.10 Residents argued that the cumulative emissions associated with traffic from 8,400 new homes, both from the North and South sites, would make it impossible for Swale to meet its legal obligations. In particular, the construction timeline — extending to at least 2040 — overlaps directly with the dates by which compliance with these air quality targets is required.

10.11 Objections frequently highlighted design concerns, such as the ‘canyon effect’ created by continuous walls of houses close to the road, which can trap emissions and increase pedestrian exposure. Residents also questioned whether the modelling submitted by the applicant accounted for these worst-case scenarios. Mr Heriz-Smith’s hourly and daily pollution monitoring documented high and very high exceedances of harmful pollutants measured against UK thresholds. The Applicant chooses not to recognise the “real world” harms already experienced on an hourly and daily basis. The increases in traffic between 2019 and 2024 (para 10.4, above) even before increases in pipeline developments and the proposed Highsted Park make matters worse as congestion events increase in Teynham, Bapchild and Ospringe.

10.12 It is notable that Swale Borough Council’s Environment and Climate Change Committee is so concerned about the negative health impacts of particulate matter along the A2 London Road in Teynham/Lynsted that they have commissioned additional monitoring equipment to measure levels of PM2.5 and PM10.

10.13 Paragraph 199 of the National Planning Policy Framework (NPPF, December 2024) states that planning decisions should ensure new development is appropriate for its

location, taking into account the likely effects (including cumulative effects) of pollution on health. Residents argued that the proposals fail this test.

10.14 Policy DM6 of the Swale Local Plan also requires that development proposals avoid significant harm from air pollution and include appropriate mitigation. Many respondents felt that this requirement had not been met, and that Teynham's existing AQMA status warranted a more precautionary approach.

10.15 Several objectors also referenced the lack of clear monitoring commitments or enforceable mitigation strategies in the planning documentation. Residents called for a full independent air quality assessment and questioned the robustness of the Environmental Statement's assumptions and baselines.

10.16 Residents in Teynham are extremely concerned about the health impacts of poor air quality caused by increased vehicle movements. Here are some of their comments on the Swale planning portal:

10.17 *"I am severely asthmatic. My asthma has got considerably worse in the last couple of years, and I am convinced this is due to the traffic and air pollution in the area. The dirt that flies off the road coats our house and cars — I can only imagine what I'm breathing in. I'm already on the highest possible dose of medication and don't know how I'll cope with more pollution if all these extra houses are built."* — Resident of London Road, Teynham

10.18 *"My greatest concern now, as a resident of London Road, Teynham, is that permission will be given to this development... This will mean more traffic routed through Teynham and Faversham. The increased number of cars causes an increase in air pollution for up to one mile either side of the road, which in turn causes particulates to be breathed in and enter the bloodstream. Children are more susceptible to these particulates and develop asthma and early death. Older people can get COPD and cancers."* — Resident of London Road, Teynham

10.19 *"Pollution is already at unsafe levels here. Long-term exposure to air pollution can cause heart and lung disease and Type 2 diabetes. We are in an Air Quality Management Area and new housing developments will make things worse. With several schools on or near the A2, children are being put at greater risk from long-term respiratory illness."* — Resident of Station Road, Teynham

10.20 *"The structure of our roads, at present, around Teynham, Lower Road and particularly the A2 are not capable of accommodating the traffic we already have. Increasing this traffic by proposing to build an additional 8,400 houses will only make things worse, having a negative impact on our already poor air quality, and increase risk to cyclists, pedestrians and schools that sit on the A2. This proposed development will also have severe consequences for those suffering with asthma and other respiratory conditions."* — Resident of Station Road, Teynham

11. Sewerage and Water Supply

11.1 A total of **121 objection submissions** raised concerns relating to the capacity and resilience of sewerage and water supply infrastructure on the Northern site. These were submitted by **91 individual residents**, with many highlighting the fragility of existing systems and their unsuitability for a development of this scale.

11.2 Residents expressed concern that the existing foul water drainage network in and around Teynham and Lynsted is already under considerable strain. Reports were cited of frequent blockages, flooding of private gardens and roads, and sewage overflows during periods of heavy rainfall. Many feared that the increased loading from thousands of new homes would overwhelm the system.

11.3 Several objections referenced the performance of Southern Water, questioning its capacity to deliver adequate infrastructure upgrades in a timely and reliable manner. In a letter to Helen Whately MP dated 13 March 2025, Southern Water stated: “The existing sewer network in Teynham is in poor condition and lacks sufficient capacity for the developments that have already been granted planning permission.” The letter also confirmed that no more than 50 additional homes can be connected in the Teynham area without a significant upgrade to the Wastewater Treatment Works.

11.4 In relation to potable water supply, a number of objectors noted that South-East England is already classified as a region under serious water stress. A resident employed by the water industry estimated that the Highsted Park development would require over 3 million litres of additional water per day – the equivalent of 1.2 Olympic-sized swimming pools. There were concerns that demand from thousands of new homes would further deplete already stretched resources, and that no long-term water resilience strategy had been provided to support the development.

11.5 The same resident also raised concerns about the vulnerability of chalk aquifers in the area, which are relied upon for public drinking water. He noted that parts of the site lie within Environment Agency Source Protection Zones (SPZs), including SPZ1, the most sensitive designation. These aquifers are particularly susceptible to pollution from surface run-off, sewage leakage and poorly managed urban drainage.

11.6 Some submissions highlighted the absence of clear commitments to sustainable drainage systems (SuDS) or grey water recycling, questioning whether the development design incorporated water conservation measures consistent with national and local policy.

11.7 The NPPF requires that planning policies and decisions should be informed by early engagement with infrastructure providers, and that cumulative impacts on existing networks should be taken into account. Residents argued that these principles had not been properly followed.

11.8 The addition of 1,250 new homes in Teynham will exacerbate existing drainage and flooding issues. As acknowledged by Southern Water above, Teynham Wastewater

Treatment works (WwTw) is already at capacity. The proposed development within 21/503906/EIOUT will rely on a new pumping station to be created just off the A2 with wastewater being pumped to Sittingbourne WwTw.

11.9 At this stage there is no information about when this infrastructure will be introduced and at what phase in the development. The existence of combined foul and surface water sewers in the Teynham area offers a compromised drainage system which cannot cope with existing pressures of domestic demand and changing climatic conditions.

11.10 The development will rely heavily upon discharge to the ground in the undeveloped areas of the site to deal with surface water runoff, placing greater pressure on combined sewers.

11.11 The water supplied in Teynham is already coming from pumping stations at Belmont, Eastling, Highsted and other small villages. These stations depend on unpolluted water from underground aquifers. These just about manage to supply local villages but at times struggle to cope.

11.12 It is uncertain as to whether the proposals meet the requirements of Local Plan policies DM21 and CP6 to, respectively, integrate drainage measures within the design of the scheme to ensure the most sustainable option for drainage is delivered and to demonstrate that adequate water supply and wastewater connection and treatment infrastructure is in place.

11.13 Many objections also noted that the Environmental Statement and associated technical documents provided insufficient detail about network capacity, mitigation timelines, or enforceable delivery mechanisms. There were calls for a more rigorous infrastructure impact assessment before planning consent is considered.

11.14 In a detailed submission to the Inquiry, a resident with expertise in geology raised serious concerns about the risks posed to Sittingbourne's water supply by the proposed development. He explained that the town is entirely reliant on groundwater drawn from the North Downs chalk aquifer, which underlies much of the Highsted Valley. The area is designated both as a Groundwater Vulnerability Zone and as an Environment Agency Source Protection Zone 1 — the most sensitive classification. He referenced geological studies that show the Seaford chalk in this area is highly porous and vulnerable to dissolution and collapse, including past incidents of sinkholes. He warned that construction works could disturb existing karst features and accelerate contaminant flow through the aquifer. Historic soil sampling on site has detected pollutants such as heavy metals and hydrocarbons in multiple boreholes, posing a risk to public health and the environment. He also questioned the long-term feasibility of Southern Water's contingency measures, such as transporting water from distant or stressed sources, and concluded that it would be unsafe and unsustainable to gamble with the region's future water security.

11.15 The serious infrastructure shortfalls identified above are not theoretical concerns — they are already being experienced by residents across the area. Their first-hand accounts demonstrate the existing failures in water supply and sewage systems, and the widespread fear that Highsted Park would make an intolerable situation worse.

Comments included the following:

11.16 *“We already suffer frequent overflows of raw sewage in Frognal Lane when it rains heavily. The manholes pop, and foul water floods across the lane. Southern Water has been out multiple times but nothing ever really changes. We can’t even let our kids play in the garden after heavy rain. Adding more houses to this broken system is irresponsible.”* – Resident of Frognal Lane, Teynham

11.17 *“There’s often a worrying drop in water pressure here, especially in summer when everyone’s using hoses or filling paddling pools. If the system can’t even cope with the homes already here, how is it going to handle another 1,200?”* – Resident of Frognal Lane, Teynham

11.18 *“We’ve had raw sewage overflow into our garden multiple times during periods of heavy rain. It’s disgusting — and dangerous. Southern Water know the network can’t cope even now. Adding thousands of new houses will push it over the edge.”* – Resident of School Lane, Bapchild

11.19 *“The water pressure in our house drops dramatically during the summer months — sometimes it’s little more than a trickle. We’ve been told this is because the local infrastructure can’t meet demand. How will it possibly cope with thousands of extra homes?”* – Resident of Tonge Corner

11.20 *“Flooding from blocked drains is already a regular occurrence on our road. The system backs up and spills onto the pavement and into driveways. We’ve reported it but nothing gets fixed. If more homes are added, this problem will become a public health risk.”* – Resident of Station Road, Teynham

12. Heritage and Conservation Areas

12.1 A total of **122 objection submissions** on the Northern site planning portal raised concerns regarding harm to heritage assets and conservation areas. These were submitted by **92 individual residents**. Objections focused on the potential impact on designated heritage assets, listed buildings, and the character of nearby conservation areas including those in Lynsted, Teynham, and Bapchild.

12.2 Residents expressed concern that development would disrupt key visual sightlines from heritage assets, alter the rural setting of listed farmsteads and cottages, and intrude upon historically significant views across open countryside. There were specific references to the undesignated but locally valued heritage landscape between Frognal Lane and Claxfield Lane.

12.3 Many responses cited the absence of a thorough and independent heritage impact assessment that addressed cumulative visual harm and setting erosion. It was argued that the Environmental Statement submitted by the applicant failed to adequately assess the effects of scale, massing, and urbanisation on heritage features and their surroundings.

12.4 Paragraphs 212 to 215 of the National Planning Policy Framework (NPPF, December 2024) state that great weight should be given to the conservation of designated heritage assets, and that harm must be clearly and convincingly justified. Residents argued that this test had not been met and that the proposals would result in substantial, if not irreparable, harm to local heritage significance. In particular, irretrievable harm would be caused to the outlook and setting of Grade 1 listed Tonge church and Grade 11* listed Frognal Farmhouse.

12.5 Policy CP8 of the Swale Local Plan 2017 seeks to protect and enhance the historic environment, including both designated and non-designated heritage assets. Policy DM32 further states that development should not cause harm to the significance of conservation areas or the settings of listed buildings. Objectors argued that the scheme was in clear conflict with these policies.

12.6 The proposed alignment of the NRR would bring urbanising features into the wider, largely rural setting of the Tonge Mill and pond, impacting its heritage value. As it crosses the Mill stream the road would introduce noise and movement to the tranquil, peaceful experience of the Conservation Area. The proposed development would be contrary to Local Plan policy DM34 which seeks to protect and preserve Conservation Areas and their settings.

12.7 It is to be noted that the Tonge Conservation Area was reviewed and extended by Swale Borough Council in 2021 due to the importance of various elements of historic value lying in close proximity including the surviving earthworks of Tonge Castle and fortified manor, the Archaeological potential for prehistoric and Roman activity, the association of the spring, the cult of Thomas Becket and grounds of former leper hospital and the anecdotal association of the area with the legend of Vortigern, Hengist and Horsa.

12.8 A number of other responses raised concerns about archaeological potential. It was noted that the area has known Roman and medieval features, including the nationally important statue of the Roman sea god Triton and a Roman mausoleum near the London Road at Teynham. Yet by the date the applications were due to be considered by Swale's planning committee, there was no clear evidence of a comprehensive archaeological desk study, archaeological excavations or geophysical survey. Residents felt that the scale of impact upon archaeological interest would be contrary to Local Plan policy DM34 which seeks to protect areas of high archaeological value.

12.9 Residents raised strong objections on the basis that the impacts of the development on the historic environment are significant and harmful, and will destroy the historic character of a large section of the traditional fruit growing area of the Borough which plays a fundamental part in the historical evolution of numerous villages on the eastern side of Sittingbourne dating back to the medieval era. These links back to the past are irreplaceable and their loss will be of detriment to all of the affected parishes and villages.

12.10 Overall, residents contended that the proposal would lead to the urbanisation of historically rural landscapes and cause a loss of historic setting that cannot be reversed, with inadequate safeguards proposed.

12.11 I would also refer to the objections prepared on behalf of the Action Group on heritage grounds contained with core documents 43.1.2 (Dr Nicholas Doggett) and 43.2.2 (Paul Townson).

12.12 Residents expressed deep concern that the historic identity of the area would be irreversibly damaged by the proposed development. Their first-hand accounts highlight the cultural and emotional value placed on local heritage assets and settings:

12.13 *"I live in a property listed on the Swale Heritage Strategy. We chose to live here because of its history and peaceful rural setting. This development would envelop us in noise, traffic, and houses, fundamentally altering everything that makes this place special. The Grade II* Frognal Farmhouse would lose its entire historic context, surrounded by 15-metre-tall buildings. That's not conservation – it's obliteration."* – Resident of Frognal Lane, Teynham

12.14 *"The new access road cuts right through the Tonge Conservation Area. This area has barely changed in centuries. Introducing a dual carriageway with signage and lighting will completely destroy the atmosphere and character of this landscape. Once it's gone, it's gone forever."* – Resident of Blacketts Road, Tonge

12.15 *"This part of Kent has a unique identity shaped by its historic orchards, farmsteads, and medieval churches. The development will join together separate settlements into one urban sprawl. We'll become just another suburb of Sittingbourne with nothing to distinguish us."* – Resident of Lynsted Lane, Lynsted

12.16 *“I’m deeply worried about the archaeological significance of this site. Roman remains have already been found near Teynham. If the area is bulldozed before proper investigation, we risk destroying nationally important heritage. The developer should be forced to carry out a full geophysical survey before even considering outline approval.”* – Resident of Station Road, Teynham

12.17 *“Frognal Farmhouse was restored at great expense. It’s a vital part of the village’s history. To now surround it with housing and roads would destroy not just its setting, but the business that supports its upkeep. It makes no sense to invest in heritage and then allow it to be engulfed by development.”* – Resident of Claxfield Lane, Lynsted

13. Miscellaneous Planning Grounds

13.1 While the majority of objections fell under the principal categories already addressed in this Proof of Evidence, several additional planning and other concerns were raised by residents. These are summarised below for completeness and to reflect the full breadth of community objections to the proposed development.

13.2 A number of residents raised concerns regarding the level, type and deliverability of affordable and social housing within the proposed development. Objections included scepticism about whether promised levels of affordable housing would be met in practice, and whether the housing types proposed were aligned with actual local need. Some questioned whether housing affordability in Swale would be improved at all by the proposed mix.

13.3 Concern was expressed that the illustrative mapping contained within the documents submitted as part of the application 21/503906/EIOUT does not reflect the scale and extent of committed development in the area around Teynham. Recently constructed or recently approved (but not yet built) developments are not shown on any of the base mapping presented. This includes Spring Acres (580 dwellings), Tonge (390 dwellings), Frogna Lane (300 dwellings and 26,840sqm Commercial), Blossom Grove (130 dwellings), Lynsted Lane (10 dwellings).

13.4 The area around Teynham has already seen significant expansion of development to which the addition of a further 1,250 houses would be unsustainable.

13.5 The continued need to supply additional information and tinkering with the content of the schemes has resulted in repeated cycles of consultation which local communities find difficult to continually respond to. There are substantial costs associated with securing professional advice to assist in interpreting the submitted information. Significant sums of money have been spent defending our communities' position against unwanted and damaging development. Not only this but the Parish Councils have found it increasingly difficult to find professional consultants to help us defend our position who are not already working for developers. It feels like the odds are inherently stacked against local communities where large-scale development proposals are put forward. The repeated rounds of consultation, and subsequent updating of documents/provision of new documents during the Inquiry itself, has caused planning fatigue which has only worked in the developer's favour.

13.6 A small number of residents raised concerns regarding light pollution, loss of night-time tranquillity, and the cumulative visual impact of street lighting and vehicle headlights on currently dark rural areas. Others questioned whether the application process had properly accounted for the long-term financial burden of maintaining public infrastructure within the development.

13.7 Whilst no objections were raised to the commitment to create a new Household Waste Recycling Centre (HWRC) in application 21/503914/EIOUT, the Action Group is sceptical about whether this will in fact be delivered. We are aware of KCC's recent

(albeit stalled) plans to close four existing HWRCs as a cost saving exercise. It therefore seems highly unlikely that KCC would support or facilitate delivery and maintenance of a new HWRC. See news item here: <https://www.kentonline.co.uk/faversham/news/the-four-kent-rubbish-tips-that-could-close-as-council-cuts-287026/>

13.8 A limited number of responses also expressed concern about the perceived pre-determination of the scheme and questioned whether the community consultation process had been sufficiently transparent or inclusive. While these are not material planning considerations in a technical sense, they form part of the wider public scepticism toward the scheme and the planning process.

13.9 Across Swale, planning permission has been granted for 7,000+ dwellings that have not yet been built. There are also sites allocated for 1,700 dwellings where no planning applications have yet come forward. This is a greater number of dwellings than the entire Highsted Park proposition. We don't need Highsted Park, we just need to build out what's already been granted permission.

13.10 After deducting existing planning consents etc, Swale Borough Council is required to allocate land to accommodate 6,200 new dwellings by 2040. The two applications combined are for 8,400 dwellings – thus, greater than the total number required by the Borough for the next 15 years. The Local Plan is the democratic process by which local authorities determine where housing and infrastructure should be delivered. This developer should not be permitted to circumvent the local plan process with a speculative application that, if approved, would pre-determine the Borough's entire spatial strategy.

13.11 With the exception of a small section of land at the junction of Frognal Lane and the A2 London Road - which is included in policy allocation MU4 in the adopted 2017 Bearing Fruits Local Plan and forming part of 21/503906/EIOUT - all of the rest of the land included in both planning applications is not allocated for development in the current adopted Local Plan document. It is therefore noted strongly that both planning applications do not accord with the adopted settlement hierarchy. We maintain that the two Highsted Park applications do not offer any material considerations that would indicate the broader growth strategy set out in the plan should be abandoned, notwithstanding any in-principle support that may derive from the Housing Land Supply position.

14. Conclusion

14.1 This Proof of Evidence has presented a comprehensive analysis of the likely community impacts associated with the proposed Highsted Park Northern development. Drawing upon the voices of local residents, as well as detailed review of the submitted objections and other commentary, it is clear that the application would result in severe and far-reaching adverse consequences for the communities of Teynham, Tonge, Lynsted, Bapchild and the surrounding rural parishes.

14.2 Key themes of objection include the overwhelming pressure on already stretched public services such as GP provision, primary and secondary education, sewerage infrastructure and the local road network. Particular concern has been raised about the scheme's incompatibility with the principles of sustainable transport, as well as its irreversible landscape harm and loss of agricultural land. These objections are not simply matters of individual inconvenience – they speak to the systemic failure of this proposal to meet the tests of sustainability, deliverability and community benefit.

14.3 The total number of objections raised across all the main topics for the Northern site was 2,087. Added to the 2,014 objection points for the Southern site, that's a total of 4,101 objection points for the Northern and Southern sites combined - an exceptional number for a planning application and representing 92% of the overall response. These have not been driven by short-term NIMBYism, but by a deep and well-evidenced concern that the proposal is unsound, speculative and destructive to the area's physical, social and environmental fabric.

14.4 In contrast, letters of support for the application are few – a total of 362 supportive points, representing just 8% of the overall response. They are also overwhelmingly templated in nature. This indicates a lack of genuine grassroots support and reinforces the conclusion that the development is being pursued against the weight of local democratic opposition.

14.5 The Planning Inspector is respectfully urged to give due weight to the breadth and substance of these community objections and to recommend refusal of the Highsted Park applications in full.

Statement of Truth

I believe that the facts stated in this Proof of Evidence are true.

Signed:.....

Print name:.....

Date:.....

(END OF STATEMENT)

APPENDIX A

Community Engagement

Below is a summary of the community engagement initiatives conducted by the five parish councils that together form the Action Group.

Doddington Parish Council

- Both planning applications have been discussed regularly at parish council meetings since they were first lodged with SBC and recorded in the minutes which are published on the parish council website. <https://www.hugofox.com/community/doddington-parish-council-13785/home>
- There is a dedicated page on the website for ‘Highsted’ updates.
- Links to these items are added to the Doddington village Facebook page (the PC does not have its own FB page) and also on a WhatsApp Group (Dodds) which has 50 members and is administered by one of the parish councillors.
- A one-page summary of the meetings appears in the ‘Doddington, Newnham and Wychling Newsletter’ which goes out monthly to most households.
- A residents meeting dedicated to the Highsted applications was held at the village hall on 28th April 2024. There were maps and displays explaining the applications. Parish Councillors chatted with residents. Residents were encouraged to respond to the planning applications via Swale Council’s Planning portal or by writing or e-mailing the planning department. Approximately sixty people attended and almost all residents were opposed to the developments.
- Parish Councillors regularly make themselves available in the local pub to discuss matters relating to the parish including the Highsted Park applications.
- Since joining the ‘Teynham and Highsted Community Action Group’ a separate update has been added to the newsletter from February 2025 highlighting the Action Group’s new website plus updates on the public inquiry and fund raising campaign.
- The Action Group’s flyer was delivered to all households in the parish and displayed in the pub, butchers and service station

Teynham Parish Council

- Both planning applications have been discussed regularly at parish council meetings since they were first lodged with SBC and recorded in the minutes which are published on the Teynham Parish council website.
<http://www.teynhamparishcouncil.org/default.aspx>
- Updates on the two planning applications appear in a dedicated ‘Highsted Park’ section of the website where parishioners are updated on the applications plus the PC’s responses to the applications including Planning and Transport reports.
- Regular updates are posted on the Teynham Parish Council Facebook page.
<https://www.facebook.com/teynhamparishcouncil>
- Information relating to the two planning applications have been placed in the parish council’s noticeboards since 2021.
- During August/September 2021 Teynham Parish Councillors distributed a leaflet (‘Protect Land West of Teynham’) to approximately 1600 homes in the parish. The leaflet gave a summary of the two applications and explained our concerns. It also gave details of where to find further information and how to respond via Swale Borough Council.
- The Action Group’s flyer (which included details of the public inquiry and the fund raising campaign) was delivered to all households in the parish and displayed in notice boards.
- Regular updates have been included in Teynham News, the quarterly parish council magazine, which is delivered to 1,600 homes in the parish

Tonge Parish Council

- Both planning applications have been discussed regularly at parish council meetings since they were first lodged with SBC and recorded in the minutes which are published on the parish council website. <https://tongeparishcouncil.co.uk/>
- Updates on the two planning applications appear in the 'News' section of the website where parishioners are encouraged to respond to the applications plus it includes Tonge PC's responses to the applications including Planning and Transport reports commissioned by the parish jointly with Teynham PC.
- Regular updates are posted on the Tonge Parish Council Facebook page.
- Updates from the parish Facebook page are reposted onto the Heron Fields Residents Group Facebook page (Heron Fields is a housing estate which forms part of the parish).
- Information relating to the two planning applications have been placed in the parish council's noticeboards since 2021.
- Updates have been posted on the 'Nextdoor' neighbourhood network for Tonge and surrounding communities.
- During August/September 2021 Tonge Parish Councillors distributed a leaflet
- ('Protect Land West of Teynham') to approximately 430 houses in the parish. The leaflet gave a summary of the two applications and explained our concerns. It also gave details of where to find further information and how to respond via Swale Borough Council. Parish councillors distributed the leaflets and were able to answer questions and discuss on doorsteps.
- The Action Group's flyer which included details of the public inquiry and the fund-raising campaign was delivered to all households in the parish and displayed in notice boards.

Lynsted with Kingsdown Parish Council

- Both planning applications have been discussed regularly at parish council meetings since they were first lodged with SBC and recorded in the minutes which are published on the parish council website.
<https://lynstedwithkingsdownparishcouncil.co.uk/agendas-minutes-of-meetings>
- The 'Latest News' section on the website includes regular 'Highsted' updates.
<https://lynstedwithkingsdownparishcouncil.co.uk/>
- Updates on the Highsted Park Planning applications are regularly posted on local Facebook and WhatsApp groups.
- The Annual Parish Meeting held on 30 September 2024 and attended by 70 residents was devoted to planning, with a presentation by an expert consultant. Highsted Park was discussed in detail with large scale maps of the site available for inspection
- Parish council representatives attended the Lynsted Fete 28th August 2023. Highsted Park display boards were on show and the applications were discussed with attendees.
- The Parish Council chairman ran a survey jointly with the local MP, Helen Whately, asking for residents' views on Highsted Park
<https://www.favershammidkentconservatives.org.uk/campaigns/let-us-know-what-you-think-about-highsted-park-development>
- The PC Chairman, Julien Speed, has regularly given interviews to the Kent Messenger and other media explaining residents' concerns. Examples include:
<https://www.kentonline.co.uk/sittingbourne/news/mp-makes-outrageous-request-to-government-over-decision-fo-317227/>
<https://www.telegraph.co.uk/business/2024/11/13/fury-angela-rayner-takes-control-kent-garden-town-plans/>
<https://www.kentonline.co.uk/sittingbourne/news/mp-calls-for-public-inquiry-into-garden-village-plans-252503/>
<https://www.kentonline.co.uk/sittingbourne/news/deputy-prime-minister-invited-to-visit-town-before-deciding-319440/>
- The Parish Council administer the Fighting Fund bank account on behalf of the Action Group, receiving donations and settling invoices



How Highsted Park may look and, inset, Cllr Julien Speed Picture: Quinn Estates

Protesters to launch crowdfunding appeal

Action group: ‘We need £40k to fight Highsted Park’

By Joe Crossley
jcrossley@thekmgroupp.co.uk

A protest group hopes to raise £40,000 for a legal battle against 8,400 new homes.

Teynham and Highsted Community Action has been set up to fight the Highsted Park development which could be built to the south and east of Sittingbourne.

It consists of four parish councils: Teynham, Lynsted with Kingsdown, Tonge, and Doddington, and it will have its say during the public inquiry into the plans, called for by Angela Rayner, Secretary of State for Housing, Communities and Local Government.

Group spokesman, Cllr Julien Speed (Con), who represents Teynham and Lynsted on Swale council, says while raising the funds for legal representation is a “daunting prospect” he is “confident” the community will support the fight against the “new town”.

The consortium has appointed Bruce Bamber of Railton TPC Ltd, a consultant with more than 30 years of experi-

ence in the transport planning industry, to provide advice.

It will be represented by planning barrister Simon Bell during the public inquiry, which starts on March 11 and is expected to run for almost 50 days.

Cllr Speed said: “As the development is so vast we won’t have the funding to fight every aspect and we have not determined what our areas of focus are.

“But one will be transport because the local road network simply cannot cope with this level of development.

“Also it would see concrete poured on 1,600 acres of greenfield land, over 85% of which is grades 1-3a (excellent to good quality).

“This would mean the loss of important arable farmland for food production and security, contrary to both local and national policy.

“We simply cannot allow this to happen, which is why the action group has been set up to ensure local voices are heard”.

The proposals by Quinn Estates are split across two separate applications, covering land to the south and east of Sit-

tingbourne, stretching to Bapchild and Teynham.

The larger site surrounding Sittingbourne, which has two halves named Highsted Village and Oakwood Village, is earmarked for up to 7,150 homes, community space, a hotel, a new tip, and primary and secondary schools.

It also includes a new M2 motorway junction and the completion of the Southern Relief Road.

The smaller site, known as Teynham West, is planned to host up to 1,250 homes, along with sheltered and extra care accommodation, a primary school, and the Bapchild section of a Northern Relief Road.

Quinn Estates said it would be the most sustainable development in the south east, adding: “The proposals are entirely suitable for the site in terms of land use, amount of development, access, layout and appearance.”

However, the plans attracted 700 letters of objection.

Teynham & Highsted Community Action will be launching a crowdfunding campaign later this month.

- The Action Group’s flyer was delivered to all households in the parish and displayed in notice boards.

Newnham Parish Council

- Both planning applications have been discussed at parish council meetings since joining the ‘Action Group’ in December 2024 and recorded in the minutes which are published on the parish council website.
- ‘Doddington, Newnham and Wychling Newsletter’ which goes out monthly to most households has included information about the applications.

Joint Parish Council Initiatives

- A residents’ meeting dedicated to the Highsted applications was held at Teynham Community Hall on 6th April 2024. There were maps and displays explaining the applications. Parish Councillors chatted with residents who were encouraged to respond to the planning applications via Swale Council’s Planning portal or by writing or e-mailing the planning department. Approximately 180 people attended.
- The ‘Action Group’ arranged a joint meeting/ drop in session at Teynham Village Hall on 9th February 2025 to inform residents of progress on the planning applications and public enquiry. There were maps and information about how to donate to the fund-raising campaign. Parish councillors from all the parishes were available to discuss and answer questions, following a formal presentation which included a speech from the MP for Faversham & Mid Kent, Helen Whately. The event was publicised via Facebook, websites, posters and other social media. Around 50 residents attended.
- A further public meeting was held in Doddington on 2nd March 2025 where representatives of each council from the Action Group briefed residents from Doddington and Newnham about our response to the forthcoming Inquiry and our fundraising initiatives. Residents raised multiple concerns about the planning proposals and asked questions. The meeting was attended by over 60 residents, three of whom subsequently spoke at the Inquiry during the public sessions.
- The ‘Action Group’ jointly produced a flyer to raise awareness of the planning applications and public enquiry which was distributed to all households in the five parishes. The reverse side was a window poster which has been extensively displayed.
- A crowd-funding campaign was launched via Go Fund Me to raise money for our activities and individual residents were also approached and invited to make donations. Regular updates were provided on social media.
- The ‘Action Group’ jointly created a website called ‘Stop Highsted Park’ which keeps residents informed on the planning applications and public inquiry. This website has been kept regularly up-to-date as the Inquiry has progressed. Website: <https://teynham-highsted.org/>
- We have produced 100 garden boards which have been prominently displayed in gardens and at the roadside throughout the five parishes. Demand for these boards outstripped supply.
- At least one representative of the Action Group has attended every day of the Public Inquiry to date and regular updates of proceedings have been provided on social media.

- In conjunction with the Five Parishes Group, we secured attendance by residents at the Third Parties Days on May 15 and 16. We co-ordinated many of the speakers to ensure that only relevant planning considerations were aired; that a wide range of topics were covered; and that there was a minimum of duplication.