FIVE PARISHES GROUP

Response to the Secretary of State's letter dated 11 September 2026

Applications	Highsted Park Southern Site (21/503914/EIOUT) and Northern Site (21/503906/EIOUT)
Secretary of State refs	APP/V2255/V/24/3355313 and APP/V2255/V/24/3355314
Submitted by	Five Parishes Group (Rule 6 Party)
Date	25 September 2026

By email: PCC@communities.gov.uk
For the attention of Emma Hopkins, Decision Officer, Planning Casework Unit

Dear Ms Hopkins,

TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77

HIGHSTED PARK, LAND TO THE SOUTH AND EAST OF SITTINGBOURNE AND LAND TO THE WEST OF TEYNHAM

1. Introduction & Opening Statement

1.1 This formal representation is submitted by the Five Parishes Group in response to the Secretary of State's letter inviting the parties to comment on post-inquiry submissions from the Applicant (Quinn Estates), Swale Borough Council (SBC), Highways England, Kent County Council (KCC) Highways, The Teynham and Highsted Community Action Group and ourselves.

1.2 The Five Parishes Group (FPG) maintains its objection to outline planning applications 21/503906/EIOUT and 21/503914/EIOUT.

2. Comments on Post-Inquiry Responses

2.1 Quinn Estates (The Applicant)

2.1.1 Quinn Estates continues to assert that strategic highways, including the Sittingbourne Northern Relief Road (SNRR) extension and Sittingbourne Southern Relief Road (SSRR), are fully deliverable within standard frameworks and cost assumptions. FPG maintain that viability is unsound. The evidence proves the Applicant's civil engineering cost assumptions, land costs etc were radically underestimated.

2.1.2 The Applicant's justification that housing targets override local plan allocations undermines the statutory planning process and we believe they are trying to bypass Swale Borough Council (SBC) ongoing Local Plan review.

2.1.3 The Applicant argues that the new, upcoming Swale Local Plan should be ignored because the process is not yet complete. But this ignores a specific rule called Policy HO13(4). The Applicant's claim that 8,400 homes across the North and South schemes constitute "logic extensions" that are "physically well related" to existing settlements. However, we do not agree that these applications accord to NPPF Policy HO13(4), for the North or for the combination of the North and South combined. In reality, this

massive scale of development completely engulfs distinct rural communities. It turns historic, independent villages into continuous urban sprawl.

2.1.4 The developers claim their plans follow Policy S5 in the new NPPF. NPPF Policy S5 requires that development benefits substantially outweigh the adverse effects. We say the Applicant downplays irremediable harm to heritage assets, ancient woodland, biodiversity, BMV agricultural land and the Kent Downs National Landscape. These irreplaceable rural assets far outweigh the speculative unproven benefits in these applications. FPG believe that the developers haven't proven the "exceptional circumstances" needed to follow Policy S5(4).

2.1.5 The Applicant is trying to use Policy HO7 to win approval, claiming their applications meet housing need. However, SBC's latest 2026 Housing Market Assessment requires 28.4% of all new housing to be affordable with the majority to be affordable rent. It is clear to us that these 2 applications do not meet this criteria.

2.1.6 The Section 106 agreement provides for a shockingly low amount of affordable housing. The Northern Application only secures a meager 6.08% to 11.28%, while the Southern Application secures just 16.7% to 22.5%, depending on what else they have to pay for. Anything more than these low baselines is completely dependent on future "viability reviews". Given the extensive infrastructure costs and known delivery challenges on these sites, these viability loopholes mean the Applicant's could easily fail to delivery these poor levels of affordable housing, in particular affordable rented housing.

2.1.7 The Applicant cannot use the housing crisis to justify a massive development when their own viability issues mean the project will largely fail to deliver the affordable rented homes the community actually needs.

2.1.8 The Applicant has ignored and failed to address the issues around Stones Farm Countryside Park. The SNRR cannot coexist with this protected open greenspace, nor have they dealt with the costs of suitable replacement land, compulsory purchase, the positive covenants in favour of Natural England and hydrological protection of the chalk stream etc. We believe these issues undermine the applications viability and are not adequately assessed by the Habitats Regulations Assessment.

2.2 Swale Borough Council's (SBC)

2.2.1 SBC's submissions do not address the critical water infrastructure.

2.2.2 FPG welcome SBC's comment on both the Bexon and Cellar Hill & Greenstreet Conservation Areas.

2.2.3 FPG support Swale's emerging Policy ST6 and Policy H1, which reflects the 2026 NPPF. In a change to the current Bearing Fruits Local Plan, the council now demands a flat 30% affordable housing on all greenfield sites across the borough. These applications fail to deliver policy compliance.

2.2.4 SBC concludes that the presumption in favour of sustainable development is not engaged for either application. The collective harm to the Kent Downs National Landscape, the destruction of ancient woodlands, the severe impacts on historic conservation areas, and the loss of mass agricultural land far outweigh the public benefits. The council recommends that the Secretary of State refuse planning permission for both sites and FPG agree.

2.3 Comments on Highways England

2.3.1 Highways England have made no further comments. They not made any assessment of the new motorway junction on the Kent Downs National Landscape and its setting.

2.4 Comments on KCC's Response

2.4.1 KCC asserts that the Bobbing and Duchy schemes (5,000 homes) fall within Highsted Park's original "background growth allowance" of 4,500–5,000 dwellings, claiming transport assessments remain sound. FPG reject this; treating 5,000 extra homes across Swale as an abstract "background

allowance" ignores real-world, localised traffic bottlenecks along the A2, narrow rural lanes and junction capacity.

2.4.2 KCC continues to endorse the SNRR and SSRR as overall benefits. In reality, these strategic link roads will in our view create induced traffic flows, sever historic countryside corridors, and turn quiet rural lanes into rat-runs, rather than relieving genuine congestion for local residents.

2.4.3 FPG strongly agree with KCC's conclusion that Highsted Park lacks a credible, expert-backed cost plan and is fundamentally unviable.

2.4.4 KCC rightly insists that key road link infrastructure must be delivered "up front" before home occupation. Given the site's acute viability shortfall, FPG warns that if outline permission is granted, the applicant will inevitably seek to relax infrastructure obligations mid-development. This risks failing to integrate existing local communities and thousands of new homes without essential roads, schools, or healthcare.

2.4.5. KCC's evidence confirms that secondary schools across Swale are operating at total capacity. Relying on Highsted Park to deliver independent, phased primary and secondary schools is a gamble given the scheme's questionable financial viability. FPG agrees with this comment.

2.4.6 Adjacent developments (Bobbing and Duchy) absorb their own self-contained primary capacity and offer no surplus to offset Highsted Park. Pushing forward with an unviable 8,400-home scheme risks overloading local school networks, medical facilities, and active travel infrastructure beyond repair.

2.4.7 KCC demands "integrated multi-user pathways" to offset growth, but no amount of surface-level PRoW enhancements can replace lost open countryside, destroyed ancient woodland, or damaged non-designated heritage assets. These demands can't be delivered in many places as discussed in the inquiry CD 42.1.2.

2.5 Comments on The Action Groups' Responses

2.5.1 The Action Group strongly reinforces the crucial importance of protecting our local history by fully aligning with the heritage protections outlined in Policy HE5 and Policy HE6. The unique character of our historic landmarks, including the Grade II* listed Frognal Farmhouse, the Tonge Conservation Area, and the Grade I listed Church of St Nicholas in Rodmersham - depends entirely on preserving the open, rural landscapes that surround them. We agree with their comments it would cause irreversible harm to these historic assets and many, many, more throughout and adjacent to the application sites.

2.5.2 The Action Group strongly supports the findings of the emerging 2026 Swale Local Plan review, which proves that the borough's housing targets can be completely met without Highsted Park. SBC's Reg 19 Sustainability Appraisal has already raised concerns about Highsted Park. FPG supports The Action Groups comments.

3. Financial Viability Deficit & Unfunded Public Exposure

3.1 FPG explicitly poses the following critical questions to the Planning Inspectorate and the Secretary of State:

- Who will pay to close this multi-million-pound viability shortfall?
- Is central government or the Department for Transport prepared to step in with public funds to subsidise a £150m+ deficit for a speculative, unallocated developer-led scheme?
- If public funding is not forthcoming, which critical infrastructure elements will be abandoned or downgraded?

4. Post-Inquiry Material Consideration: Reserved Matters Application 25/502467/REM (Sittingbourne Northern Relief Road Infrastructure Phase)

4.1 FPG formally requests that the Secretary of State take into account, critical post-inquiry evidence: the Reserved Matters Application (Ref: 25/502467/REM) for the Phase 0 Infrastructure section of the SNRR (Land West of Church Road, North of the Railway Line). We request the Secretary of State to obtain an updated technical reconciliation from the Applicant, KCC, Swale and Trenport covering deliverability, cost, land requirements, environmental assessment and that the SNRR can meet the statutory accessibility standards.

4.2 Key parameters, feasibility assumptions, and environmental impacts concerning the SNRR were recorded during the inquiry in documents ID 100.48 and ID 100.92.

4.3 This latest evidence including the design, including the elevated structures corroborates our evidence under CD 42.5.2 where we raised concerns regarding design, containing the structures within the redline boundaries, viability and the impact on the residential amenity of the existing communities etc.

4.4 ID 100.92 is helpful in confirming that there was no agreement between Trenport and Highsted Park and that KCC's consideration was incomplete when the inquiry closed. However, it also contemplated subsequent coordination by KCC, and KCC has now accepted that the revised design safeguards the SNRR, subject to conditions.

5. Conclusion & Action Requested

5.1 In conclusion with therefore request that the Secretary of State **REFUSE OUTLINE PLANNING PERMISSION** for these applications 21/503906/EIOUT and 21/503914/EIOUT.

Yours faithfully,

Monique Bonney

Chair, Five Parishes Group

On behalf of the communities of Bapchild, Bredgar, Milstead, Rodmersham, Tunstall and Wormshill

Schedule 1 – Principal documents relied upon

Document	Reference / relevance
Secretary of State letter	Planning Casework Unit Recirculation letter dated 11 September 2026 letter inviting Rule 6 comments on post-inquiry representations, APP/V2255/V/24/3355313 and APP/V2255/V/24/3355314.
Responses Reviewed	Town Legal on behalf of Quinn Estates (the Applicant) Swale Borough Council National Highways Kent County Council Teynham and Highsted Community Action Group

Post Inquiry Material	Reserved Matters Application 25/502467/REM (Phase 0 Infrastructure – Land West of Church Road, North of the Railway Line).
Inquiry Documents	ID 100.48 and ID 100.92 (Relating to Northern Relief Road parameters and feasibility).
FPG Inquiry Case	CD 42.1.2, CD 42.5.2