

The Teynham and Highsted Community Action Group

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Via email: PCC@communities.gov.uk

Monday 7 September 2026

Dear Ms Hopkins,

TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77 Applications APP/V2255/V/24/3355313 and APP/V2255/V/24/3355314 – Highsted Park

Thank you for your letter dated 18 August 2026.

The Teynham and Highsted Community Action Group confines its comments to the implications of the new material identified in the Secretary of State's letter for matters raised at the Inquiry by the Action Group, including evidence submitted jointly with the Five Parishes Group. Where we refer to landscape matters addressed principally by the Five Parishes Group, this is made clear below. We do not seek to raise unrelated matters or reopen the Inquiry generally.

Emerging 2026 Swale Local Plan and Supporting Material

The emerging Regulation 19 Swale Local Plan identifies Land West of Bobbing and Land South East of Faversham as the strategic allocations within its preferred development strategy.

While Highsted Park was considered through the Sustainability Appraisal, it was not taken forward as a preferred strategic allocation. The emerging Local Plan demonstrates that Swale's identified housing need can be met without including Highsted Park.

The Sustainability Appraisal also records a number of comparative concerns in relation to Highsted Park, including landscape, settlement separation, agricultural land, transport and water resources. It also indicates that a substantial proportion of the development would fall beyond the emerging plan period.

DHA's material (Part 2 of Annex A) also highlights continuing viability issues and the implications of the proposed below-policy affordable-housing offer.

We recognise that the emerging Regulation 19 Swale Local Plan is still being prepared and has not yet been adopted. The proposed allocations are not planning permissions, and their

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delivery is not guaranteed. However, we consider that the material in the emerging Local Plan is relevant to the Secretary of State's assessment of Swale's development needs and the comparative planning merits of the competing development strategies.

Consistency with Strategic Allocations: Policy HO13(4)

We understand that Policy HO13(4) of the revised National Planning Policy Framework provides that, where an emerging development plan proposes to allocate one or more strategic sites, development proposals should not be inconsistent with their proposed scale, location and phasing. We understand that this applies even though the Local Plan is still being prepared and that it operates separately from the usual rules on prematurity in Policy DM4(2).

The Action Group recognises that the fact that Highsted Park is not included in the emerging Local Plan does not, by itself, mean that the applications should be refused.

However, under Policy HO13(4), we ask the Secretary of State to consider whether approving Highsted Park would conflict with the **scale, location or phasing** of the strategic development proposed in the emerging Local Plan.

The weight to be given to the emerging Local Plan remains a matter for the Secretary of State under Policy DM4(1), taking account of how far the Plan has progressed and the extent of any unresolved objections.

Heritage Considerations

Policy HE6 requires substantial weight to be given to the conservation of designated heritage assets, with greater weight given to more important assets. It also expressly provides that any harm to a designated heritage asset is a matter of considerable importance and weight.

Policy HE5 confirms that harm may arise from development within an asset's setting. This is directly relevant to the designated heritage assets considered in the joint heritage evidence submitted by the Action Group and the Five Parishes Group, including:

- **Frognaal Farmhouse — Grade II* listed** — whose significance derives in part from its historic rural and agricultural setting;
- **Tonge Conservation Area**; and
- **St Nicholas, Rodmersham — Grade I listed** — with rural setting and landmark significance.

We do not know what conclusions the Inspector has reached. However, we ask the Secretary of State to give substantial weight to the conservation of these assets and to treat any harm she finds to their significance—including harm arising from development within their settings—as a matter of considerable importance and weight in the overall planning balance.

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Landscape Character

Policy N2 expressly requires decision-makers to address the identified landscape considerations, including landscape character, the natural beauty of the countryside and existing natural features.

Landscape matters were addressed principally by our fellow Rule 6 party, the Five Parishes Group. The Action Group supports the Five Parishes Group's submission on this issue.

Conclusion

The new material reinforces important elements of the Rule 6 parties' existing cases. It also raises a further issue under Policy HO13(4) about whether Highsted Park would be consistent with the **scale, location and phasing** of the strategic development proposed in the emerging Local Plan.

We ask the Secretary of State to consider what the new material means for the competing development strategies, the viability and deliverability of the applications, the weight given to their claimed benefits, and the heritage and landscape issues already considered at the Inquiry.

These representations are confined to the implications of the new material for matters already raised at the Inquiry and do not seek to reopen the Inquiry generally.

Yours sincerely,

Teynham and Highsted Community Action Group