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# Introduction & Purpose

This document identifies and expands on key concerns that were returned from the Wormshill village survey and cross references them to National and Local planning policy (National Planning Policy Framework, Adopted and Emerging Swale Local Plans).

As such, this document provides clearly identifiable sections that individuals can draw on and amend, adapt, and expand as they see fit to inform their own objections.

The text provided is not intended to be used verbatim in any comments to planning applications.

# Planning Comments Process

To lodge an objection to a planning application, the easiest method is to send the comments by email to: [planningcomments@midkent.gov.uk](mailto:planningcomments@midkent.gov.uk)

This email should contain the following form:

I wish to object to both Planning Applications referenced **21/503906/EIOUT** & **21/503914/EIOUT**. The grounds for my considered objection are listed below:

[Detail reasons here]

From [Name]

[Address]

**Is it important that name and address are included** as comments will not be recorded without this, and comments should be ‘planning relevant’ and avoid emotion.

# Local Plan

Neither of the proposed developments are currently part of the Swale Local Plan. This is from both its adopted Local Plan (2017) nor it’s emerging Local Plan (2022). Further, the location has previously been considered as part of Swales ‘Looking Forward’ and Local Plan review and was not taken forward.

The proposals go against some of the core objectives of the local plan such as:-

4. **Conserve and enhance our historic and natural assets** as the means to drive regeneration, tourism, and **environmental quality and to reverse declines in their condition**.

8. **Support our farming and food sectors so that they are** **at the forefront of increasing food security, reducing food miles and increasing local food consumption**.

11. **Improve prosperity and environmental quality with efficient and sustainable transport networks**.

12. Ensure **timely delivery** of the services and infrastructure to support strong communities

The emerging local plan (2022) allows for the housing numbers necessary for Swale, without this development.

# Planning Balance

There is a significant lack of planning balance with this proposal; The addition of (total) 9,250 homes to the East and South East of Sittingbourne represents an increase of some 36.6% against the 2011 census for the following Wards:-

* Borden & Grove Park, Chalkwell, East Downs, Homewood, Kemsley, Milton Regis, Murston, Roman, Teynham & Lynsted, The Meads, West Downs & Woodstock

*Based on information available from Kent County Council Strategic Commissioning, ‘Total Household spaces’ from Census 2011; Total number listed 25,247 vs 9,250.*

It would be unreasonable to expect one area to take on this level of housing provision, increasing ‘West Downs’ ward so significantly; The supporting infrastructure is simply not in place. This is, after all, why Swale have proposed the distribution of homes within the Emerging 2022 Local Plan.

This also is not consistent with the Local Plan based Objective:-

4. Address identified needs in our **rural communities so that they are sustained in ways that also respect their scale and character**.

More recently, Central Government has now suggested that building on Green Belt should be a secondary focus once all existing Brownfield Sites have been exhausted; This development does not fit within this target.

Given that Swale have been subject to Grampian conditions owing to the status of M2 Junction 5 since the adoption of the 2017 Local Plan, I’d also question how the scheme will be delivered within NPPF Para 77, specifically deliverability and viability. This is without consideration to challenging the high Government housing target whilst unable to actually deliver provision.

# Area of Outstanding Natural Beauty (AONB) & Area of High Local Value (AHLV)

The proposed development red line includes an area of AONB Land and a large portion of AHLV Land. The impact of the proposals has been identified within the application and acknowledged. However there appears to be no mitigation measures for the use of the land or the impact that the proposals would have.

The AHLV specifically should be protected, in line with and as identified within both the NPPF and current Swale Local Plan. NPPF Section 15 Para 174 and the current Swale Local Plan Policy DM24 state that:-

**Conserving and enhancing valued landscapes**

The value, character, amenity and tranquillity of the Borough’s landscapes will be protected, enhanced and, where appropriate, managed.

This then identifies action points for both AONB & AHLV:-

***The Kent Downs Area of Outstanding Natural Beauty (AONB) is a nationally designated site and as such permission for major developments should be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB will only be granted subject to it:   
a. conserving and enhancing the special qualities and distinctive character of the AONB in accordance with national planning policy;  
b. furthering the delivery of the AONB’s Management Plan, having regard to its supporting guidance documents;   
c. minimising the impact of individual proposals and their cumulative effect on the AONB and its setting, mitigating any detrimental effects, including, where appropriate, improving any damaged landscapes relating to the proposal;   
and d. being appropriate to the economic, social and environmental wellbeing of the area or being desirable for the understanding and enjoyment of the area.***

Areas of High Landscape Value (Kent and Swale Level) are designated as **being of significance to Kent or Swale respectively**, where planning permission will be granted subject to the:   
a. **conservation and enhancement of the landscape being demonstrated**;   
b. **avoidance, minimisation and mitigation of adverse landscape impacts** as appropriate and, when significant adverse impacts remain, that the social and or economic benefits of the proposal **significantly and demonstrably outweigh harm to the Kent or Swale level landscape value** of the designation concerned.

This is further compounded by NPPF Section 15 Paras 176 & 177, with it considered that there is not a ‘need for the development’ as the housing requirements can be met from site proposed within the Emerging Local Plan 2022; There is therefore no need for developing within with AONB or AHLV land for same reason. The detrimental effect on the environment, landscape and recreational opportunities will be substantial, with the loss of quiet rural lanes, the loss of woodland and ancient woodland, open fields and the loss of a number of Public Footpaths. This is without any consideration to the increased vehicular traffic through both areas, increased levels of both light and air pollution and the loss of natural habitats, etc.

# Loss of Agricultural land

The area of the proposed development is across some 674 Hectares of land which is predominantly Farmland. This farmland is largely rated as Grade 1 and Grade 2 land, as identified in the adopted Swale Local Plan 2017, Para 7.7.96. This land is reference in the NPPF (Section 15 Para 174) as the ‘most versatile agricultural land’, with footnote 58 in same section clearly identifying that

Where significant development of agricultural land is demonstrated to be necessary, **areas of poorer quality land should be preferred to those of a higher quality**

It has already been identified that this development is not necessary, and yet there is still a desire to develop ‘the best quality’ land possible.

The adopted Swale Local Plan 2017 Para 7.7.98 and Swale Policy DM31 state:-

**Agricultural land**   
Development on agricultural land will only be permitted when there is an overriding need that cannot be met on land within the built-up area boundaries. Development on best and most versatile agricultural land (specifically Grades 1, 2 and 3a) will not be permitted unless:   
1. The site is allocated for development by the Local Plan; or   
2. There is no alternative site on land of a lower grade than 3a or that use of land of a lower grade would significantly and demonstrably work against the achievement of sustainable development;   
and 3. The development will not result in the remainder of the agricultural holding becoming not viable or lead to likely accumulated and significant losses of high quality agricultural land.

Again, this clearly identifies the parameters against which a development will be permitted. At this time, with the Emerging Local Plan 2022 subject to confirmation, it can be said that ‘the overriding need’ can be met from alternative land within the built-up area boundaries and/or from lesser designated sites.

With reference to the further points listed, the site is **not in the adopted local plan**, there are alternative sites identified in the emerging local plan that area of Grade 3a or lower and the development will “result in the remainder of the agricultural holding becoming not viable or lead to likely accumulated and significant losses of high quality agricultural land”.

# Loss of Trees (Ancient Woodland)

The submitted Arboricultural Impact Assessment sets out in Section 4.3 the extent of tree removals, identifying 13nr Category A, 20nr Category B and 18nr Category C Trees will require removal, including one tree that has a Tree Preservation Order. It also identifies that, due to the proposed road network, an area of the Highsted Wood Ancient Woodland will also be subject to removal of trees. Further impacts identified include proximity of hard surfacing’s and roadways that may alter the physiological or structural potential of Trees.

Whilst not specifically listed within the Arboricultural assessment, the Ecological Appraisal identifies *“A number of likely veteran tree specimens are present within the site, which are considered to individually form features of ecological importance at the local level. Notably, a large mature London Plane is located north of the Sports Centre in Area B, which has an information board stating it is the 13th largest London Plane in the country, whilst five other likely veteran trees are present”.*

Review of the NPPF Section 15 Para 180 Item C identifies that:-

development resulting in **the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused**, unless there are wholly exceptional reasons and a suitable compensation strategy exists;

The adopted Swale Local Plan 2017 also identifies that the areas should be considered as ‘Kent Biodiversity Action Plan Habitats’ (Kent BAP).

The above referenced loss of trees does not take in to account the commercial and traditional Orchards which are considered part of the AHLV. The adopted Swale Local Plan 2017 Para 7.7.81 identifies that “*Trees, in particular ancient woodland and traditional orchards, are of high biodiversity value and can be irreplaceable*”. In addition, Swale Local Plan Policy DM29 sets out several points that cannot be met by this proposal. It could be considered that removal of the proposed trees and extent of orchards, fruit trees and scrub that are all part of the AHLV falls under 4c and that the planning permission should be refused.

# Loss of Natural Habitat

The proposed area to be developed is primarily Arable land, with sections of Ancient & Semi-Natural woodland, woodland, Quarries and commercial orchards. These areas are further fragmented up by areas of grassland, species rich grassland, tall ruderal, ruderal mosaic and open scrub mosaic. All of these areas, with their diverse flora and fauna, would be at risk with the proposed development.

The submitted Ecological Appraisal identifies that there are several ‘Priority Habitats’ within the proposed development area, as well as identifying Highsted Quarries and Cromer’s Wood as Local Wildlife Sites (Cromer’s Wood also as Kent Wildlife Trust Reserve) within the development site and four other Local Wildlife Sites within 2.5km (1.55 miles).

The Report references the abundance of flora and fauna recorded on site visits, including reference to Highsted Wood not only being Ancient Woodland but also falling under the description for *“UK BAP priority habitat type ‘Lowland Mixed Deciduous Woodland’…which is listed as a priority habitat in Kent”*. Further Para 4.5.5 expands,

“In the context of wooded habitats at the site, Highsted Wood is of particular importance, largely due to its Ancient Woodland listing, providing long established, largely irreplaceable habitat, and therefore it is considered that Highsted Wood constitutes an important ecological feature, of value at the district level.”

Bex Wood is also considered as *“UK BAP priority habitat type ‘Lowland Mixed Deciduous Woodland’…also considered to conform to the Kent priority Habitat ‘Native Woodland’”.* Further Wooded areas are listed in Para 4.9.8 as *“All of the established woodlands and wooded strips (W7-W10) fall under the description for the UK BAP priority habitat type ‘Lowland Mixed Deciduous Woodland’, which covers most types of deciduous woodland. ‘Native Woodland’ is also listed as a priority habitat in Kent, which covers all of the woodland within the site.”*

The adopted Swale Local Plan 2017 Policy DM28 sets out that “*development will only be permitted where it is not likely to have an adverse effect on the designated site or its interests”*.

Further, NPPF Para 180 and 182 add further “***if significant harm to biodiversity resulting from a development cannot be avoided*** *(through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for,* ***then planning permission should be refused***”.

The issued Ecological Appraisal report concludes in Para 6.4 and Table 6.1 that there are several areas of District, Local and Site importance, with no mention of ability to mitigate. It is therefore considered that the assessment cannot conclude that the project will not adversely affect the integrity of the habitat site(s).

# Loss of Wildlife

Within the Ecological Appraisal it has identified that there are several protected and notable faunal species present both within the site, the local area and the extended local area. The loss of habitat will have a profound effect on these species.

The species listed include roosting, foraging and commuting bats, badgers, dormouse, hedgehog, hare and reptiles, together with notable invertebrates, amphibians and moderate assemblage of bird species.

The adopted Swale Local Plan 2017 Policy DM28 sets out the basis of assessment for such events. It cannot be said that the need outweighs the biodiversity interest of the site(s), as the scheme is not identified as being required under the Emerging Local Plan 2022. Further, NPPF Para 180 states,

When determining planning applications, local planning authorities should apply the following principles:

1. **if significant harm to biodiversity resulting from a development cannot be avoided** (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, **then planning permission should be refused**

With specific reference to Dormouse and Great Crested Newts, the ‘Kent Biodiversity Action Plan’ provides further objectives for planning applications; This development cannot be seen to achieve any of these objectives.

# Road Infrastructure and Traffic

The fundamental underpinning of these applications is the proposed road infrastructure, yet the proposals contravenes the basic principles that DfT have put in place in relation to the delivery of Sustainable development.  
Within their issued document ‘Strategic Road Network and the Delivery of Sustainable Development’ (DfT Circular dated 10th September 2013). Specifically, Paras 9, 21 & 22 identify criteria that this proposal cannot meet, with the submitted Transport assessment stating that the scheme will increase the demand for use of the M2 to the point of being ‘at capacity during the worst-case peak flow’, as well as not being part of the adopted Local Plan; Thus a full assessment of impact should be necessary.

The required independent strategic growth assessment as required by Paras 39 & 40 appears not to have been completed; If it cannot be fulfilled then it is listed that “no additional junctions with, or direct means of access to, motorways and other routes of near motorway standard” are permitted.

The proposed South Sittingbourne Relief Road (SSRR) is considered to be necessary to relieve pressure on the existing road infrastructure in and around Sittingbourne. However, it does not take in to account the now approved works to the A249 (M2 Junction 5) which it identifies as being the primary cause for congestion in and around the area.

The proposed connection point of the junction on the M2 is, despite being reasonably straight, also an accident hotspot. In the last 22 years, data from CrashMap.co.uk shows that there have been 54 Minor accidents, 5 serious accidents and 1 fatal accident in the M2 section between Primrose Lane (Bredgar over bridge) and Bottom Pond Road (Viaduct). For a section of road that is largely straight and only 1.51 miles in length this seems significant. Further, the addition of an additional junction, where vehicles may make weaving movements to exit/join is hardly going to improve the situation.

The submitted Transport assessment also identifies in Volume 7, Para 5.3.21 that the “With Development scenario demonstrates an increase in traffic on the M2, between Junction 5 and the proposed Junction 5a, of around 1100pcu in the AM peak and 850pcu in the PM peak”. Whilst it is claimed that traffic will be reduced at M2 J5, this is subjective and based on assumed travel routes, in the same way that it has been assumed that a number of vehicle movements will only be confined to ‘the development’. It also does not take in to account the now agreed works to M2 J5 that will significantly improve capacity on this section of the road network, thus negating the need for this proposal. It cannot therefore be said that this development is improving the situation on one of Kent’s main Motorways.

Further review of the submitted Transport Assessment also identifies that there has been no consideration for any traffic movements South of the M2 (See Volume 7, Para 3.4.11 “Ruins Barn Road, to the south of the proposed development, links to the wider rural road network south of the M2. **The modelled capacity of the Ruins Barn link, to the south of the M2, was limited in order to avoid unrealistic routing of traffic via rural routes**”). This is a fundamental failing in the assessment, as it ignores the inevitable vehicular movements to get to the M20 through existing, rural lanes. This is in stark contradiction to NPPF Para 103, with this proposal looking to urbanise rural villages.   
These lanes are largely single track and would not accommodate a significant increase in traffic movements. Rural lanes are also identified specifically in the Swale Local Plan (see Paras 7.7.36 – 7.7.39). Specific attention should be paid to:-

Para 7.7.36

**Swale possesses a rich heritage of rural lanes that contribute to rural amenity, nature conservation and the character of the landscape.**

Para 7.7.37

In order to safeguard these lanes, **the Council will not permit development that would harm their identified qualities**, and will implement traffic restraints, speed restrictions, routing agreements with businesses, and tree and hedgerow preservation orders. Development proposals may similarly bring forward such proposals as mitigation of adverse impacts, together with measures such as landscape or historic features restoration

No such mitigation measures have been brough forward in this proposal, with all of the focus within Transport Assessments made on the proposed new Infrastructure.

Policy DM 26 goes further:-

Rural lanes

**Planning permission will not be granted for development that would either physically, or as a result of traffic levels, significantly harm the character of rural lanes**. For those rural lanes shown on the Proposals Map, **development proposals should have particular regard to their landscape, amenity, biodiversity, and historic or archaeological importance**.

All of the local, rural lanes that will be affected by this proposal are shown on the adopted Proposals Map (2017). No such regard has been made.

This is all with the backdrop that the road junction will increase the number of both Light Goods Vehicles (LGV) and Heavy Goods Vehicles (HGV) in and around the local area, both from the improved connection to Kent Science Park and the creation of new industrial and commercial units. These vehicles are recognised as being some of the worst polluters (18% of all road transport emissions are from HGV’s, which only make up 5% of Vehicle Miles; Reference Department for Transport, Transport and Environmental Statistics 2021 Annual Report, Dated 11th May 2021) and, again, no consideration has been paid to the potential access of these vehicles through the existing rural road network to access the M20.

As a final point of note, all calculations provided show that the M2 is operating close to capacity, with the introduction of the additional junction pushing this to capacity and over threshold for the current lane arrangement; See Volume 6, Para 2.4.5:-

In the case of the merge and diverge layouts, it is apparent that in three of the four layouts proposed, traffic flow levels will be approaching or potentially exceeding threshold levels above which the recommended layouts would be for lane gains or lane drops as appropriate

It is also identified that the proposed layouts with be operating at and near capacity; See Volume 6, Table 2.1 Notes:-

2. Diverge layout will be operating at near capacity during the worst-case peak flow. 2-lane upstream lane provision prevents provision of higher-level capacity Option C (lane drop).

3. Merge layout is likely to be operating at capacity during the worst-case peak flow. The 2-lane downstream lane provision prohibits provision of a higher-level capacity Option D (lane gain)

This is without any consideration for the proposed Lower Thames Crossing, which is hoped to be completed within the next 10 years. This would add increased pressure to the M2 road network; Pressure that has not been considered in this report (for better or for worse).

It is also without consideration for the impact another Motorway junction would have on the AONB; The defined boundary of the AONB follows the curvature of the M2 without regard for setting, landscape or geological feature. The proximity of another junction so close to the existing J5, in an AONB and impacting an AHLV (which is the same make up as the AONB) can only have a detrimental impact.

# Traffic & Light Pollution

The proposal for 9,250 new homes could equate to an additional 17,500 vehicles on our roads (Based on breakdown of housing stock included in Sustainability and Energy Statement, based on 1nr vehicle per 1/2 bed property, 2nr vehicles per 2, 3 or 4 bed property and 3nr per 5 bed property).

This does not include the LGV’s and HGV’s that will be servicing the proposed new commercial developments.

Whilst the Transport Assessment submitted appears to show that ‘peak movements’ will be 9,846 (Volume 7, Table 4.2) this does not seem reasonable given the headline numbers above.

The Traffic pollution that this number of vehicular movements will bring, when considered against the existing area, the AONB and the AHLV, is dramatic and significant.

This should be considered in line with NPPF Section 15, Para 185 and NPPF Section 15, Para 186.

Further, the Swale Local Plan Para 7.7.3 identifies that areas related to the extended proposed development are already ‘Air Quality Management Areas’. This does not appear to have been assessed.

In relation to light pollution, the location of the proposed new road runs in a section of sky classified as 1-2 NanoWatts/cm2/sr; For reference the centre of Sittingbourne records >32 NanoWatts/cm2/sr and fringe areas are classified as 8-16 NanoWatts/cm2/sr (Values taken from CPRE ‘NightBlight’ Map). The significant light pollution generated by Kent Science Park (8-16 NanoWatts/cm2/sr) and the light creep from Sittingbourne are the only reasons that this figure is so high.

The proposed Development, with its road, commercial and residential outputs, will drastically change this level of light pollution in a way that cannot be mitigated. This will impact local amenity and nature conservation.

This is further compounded by Consultee Comments from Kent Police, which clearly state that ‘all roads including main, side roads, cul-de-sacs and car parking areas’ are required to be lit, along with ‘we still strongly recommend all footpaths to be well lit’. This, along with residential lighting, will change the night sky in the area, the AHLV and AONB for ever.

# Public Transport Pressures

The proposal for 9,250 homes will bring an approximate 26,500 people to the area (Based on breakdown of housing stock included in Sustainability and Energy Statement, based on 1nr Person per 1/2 bed property, 1nr person per bedroom for 2, 3, 4 & 5 bed properties). This could equate to an additional 17,500 vehicles on our roads (Based on breakdown of housing stock included in Sustainability and Energy Statement, based on 1nr vehicle per 1/2 bed property, 2nr vehicles per 2, 3 or 4 bed property and 3nr per 5 bed property).

The development has proposed a ‘Sustainable transport corridor’, however in practice the frequency of bus movements is not sufficient to enable a full transition to public transport. This has been demonstrated repeatedly in many studies. There is also no reference to train connections; The impact on train line services from Sittingbourne and Teynham must be considered for both commuter and off-peak services.

While COVID-19 has significantly affected demand for rail travel, the Kent Railways Strategy 2021 (covering the ten years to 2031) recognises that there is a need to “plan ahead for a post-COVID-19 world in which such demand has returned to near its pre-COVID-19 level” and that rail travel, “will be central to economic recovery, and especially a recovery that is compatible with reduced congestion and carbon emissions”.

The DfT’s decarbonisation strategy, together with the Kent Energy and Low Emissions Strategy, emphasise the imperative of responding to the climate change emergency by developing transport policies which deliver modal shift from road to rail and thus reduce greenhouse emissions. The developers are however relying on expansion of the road infrastructure to resolve transport problems and therefore the proposals are in direct conflict with the aforementioned strategies.  
The existing train line serving Sittingbourne is a predominantly Victorian two-track line. Whilst this has been supplemented in recent years with the High Speed 1 service, this new service occupies the same track through the Medway towns. Due to a variety of buildings enroute enclosing the line, there is little prospect that a financially viable way of adding additional track could be found, even if such proposals had the support of central Government. Indeed, the High Speed 1 service itself runs on this track between Rainham and Rochester.

Resolving the challenge of this particular section of track would not provide additional commuter capacity in any case. The Kent Rail Strategy 2021 notes in paragraph 7.5, “At present, the peak paths to and from the London termini used by Southeastern services are full”. The Medway towns section also serves a multitude of stations from routes east of Faversham, and as a result of this congestion “the journey times to and from London are unreasonably lengthy” (7.6).

# Health Infrastructure Pressures

The proposal for 9,250 homes will bring an approximate 26,500 people to the area (Based on breakdown of housing stock included in Sustainability and Energy Statement, based on 1nr Person per 1/2 bed property, 1nr person per bedroom for 2, 3, 4 & 5 bed properties). This is a significant population increase in one isolated area, creating excessive pressure on already over stretched services.

In 2019 NHS data on GP: Patient ratio ranked Sittingbourne as the worst in the country, with a ratio of 1:3342 Patients. Increasing the area population further will only worsen this. In a statement to the House of Commons by Gordon Henderson MP advised that “*Kent cannot recruit GPs … because of the higher salaries offered in London*”. The high patient ratios do nothing to help this situation.

This has more recently been exacerbated by the planned closure of DMC Healthcare Sheppey GP practice on the Isle of Sheppey. The practice is due to close on 31st October 2021, with 9,500 patients left trying to find a new GP. Within press releases relating to the closure, Gordon Henderson MP once again stated “We are already overstretched in my constituency, I get constant complaints from people about the fact they can't see their GP” (Source BBC News Article, 9th September 21). 9,500 patients is circa 35% of the planned occupancy levels of this development.

Further, should a hospital admission be required the two closest hospitals are Medway Maritime Hospital and Maidstone Hospital. Medway Maritime was rated as “Requiring improvement” from their last CQC Inspection in April and May 2021, with their ‘Urgent and Emergency Services’ being found to be “inadequate”. Similarly, Maidstone Hospital was rated as “Requiring improvement” from their last CQC Inspection in October 2017, with their ‘Urgent and Emergency Services’ being found the same.

Whilst it’s obviously favourable to see Health infrastructure included within the development proposals, this does not provide the occupants (GP’s, Nurses, Administrators) required to deliver the service, which are in already short supply. It also does not account for any Emergency care that may be necessary at Hospitals, neither of which are proposed to benefit from this development. It could also be said that trips to Medway Hospital will, in the short term, be impacted by works to the existing road infrastructure, such as M2 J5, Keycol Roundabout and Grovehurst junction.

# Education Infrastructure Pressures

The proposal for 9,250 homes will bring an approximate 26,500 people to the area (Based on breakdown of housing stock included in Sustainability and Energy Statement, based on 1nr Person per 1/2 bed property, 1nr person per bedroom for 2, 3, 4 & 5 bed properties). It could be assumed that, based on 1nr child per ‘additional’ bedroom in 2, 3, 4 & and 3nr (total) per 5 Bedroom properties, this could equate to 17,000 Children of School age.

The proposal brings forward Four 3FE (Form Entry) Primary Schools and One Secondary School of undetermined size. This is not a commitment to build; only a suggestion that they might. The staffing requirements for the Primary Schools alone come to some 84 teachers, not including Teaching assistants (typically one per classroom) administration staff and part time support staff.   
Assuming that the Secondary School will be minimum 4FE and that each Form Entry in each year group will have a teacher, this will be the equivalent of 28 Teachers, not including administration staff and part time support staff. It’s also fair to assume that the Secondary School will have to be a ‘comprehensive’ rather than Grammar, seeing that no new Grammar Schools are permitted by law. This will create further imbalance in the local area for school places, with over-subscription increasing at Grammar Schools.

Providing Schools is admirable, however it does not provide the Teachers to teach within them. In a statement to the House of Commons by Gordon Henderson MP advised that “*Kent cannot recruit Teachers … because of the higher salaries offered in London*”. There is also a widely accepted shortage of Teachers.

The Transport Assessment Volume 7 Para 4.3.15 identifies that, for traffic modelling at least, that the “*four primary schools within the development, each with three form entries, are considered to fully cover the development needs. No external primary pupils will travel into the development, and no primary school pupils within the development will travel to external schools.*”   
This suggests that the Primary School will be available from Day one of the first house being completed, such that no pupil should have to travel outside of the Development. This is not reasonably possible. The impact of parent traffic has not been reasonably considered relevant to this. It also does not take in to account the ‘free choice’ of a parent for School places; If the Primary School within the development is not performing I suspect that a large number would migrate out to the existing rural schools with better OFSTED ratings, rendering the entire basis of the Transport Assessment redundant.

This is without considering that the Education provision is the responsibility of the Local Education Authority (LEA) to deliver; In this instance KCC. There is nothing to say that KCC will not identify existing schools that have an under provision and/or potential to expand without the need for a new, capital build that has been proposed. Should the development be subject to Section 106 Education Contributions, this further casts doubt on the potential of Education Facilities being provided within the development, as the LEA are at liberty to spend this money as required to meet the pupil needs. A prime example of this is at Great East Hall, where the development did not result in an additional School, despite the apparent need.

It should be noted that the proposed location for the ‘Highsted Village: West’ are also located on the very fringe of the development, adjacent the M2 motorway, new Dual Carriageway and proposed Commercial development. This does not strike as being the ‘safest’, least pollution area that could have been offered or allocated, as well as having poor transport links and creating additional vehicle movements to get students to School. There are further considerations too such as any pollution from activities at Kent Scient Park and specifically GPharm.

# Countryside and Gap Protection and the associated loss of Rural Villages

These applications and the proposed developments will result in the amalgamation of several rural villages and significantly increase the urban sprawl of Sittingbourne. This will cause a fundamental and irreversible change in in the character of the countryside and rural area.

The proposals do not take in to account any of the points made in NPPF Sections 5, 13 and 15. This includes Para 79:-

To promote **sustainable development in rural areas**, housing should be located where it will **enhance or maintain the vitality of rural communities**. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

The Swale Local Plan adds more importance to the maintenance of Countryside Gaps and separation of settlements; So much so that there is a whole section and Policy relating to it!

Para 7.7.30 states that “*there is a need to prevent the coalescence and the erosion of the intrinsic character of settlements close by*”, which is further emboldened by Para 7.7.31 “*The identity, character, and setting of settlements are formed, in part, by their physical separation from one another”*. Most importantly however are the statements in:-

Para 7.7.32

Within Swale, Important Local Countryside Gaps (ILCGs) were defined and set out in the 2008 Local Plan. They comprised the gaps between:   
**Sittingbourne and the satellite villages of Bapchild, Rodmersham Green, Tunstall, Borden,** Chestnut Street, Bobbing and Iwade;

Para 7.7.34

The purposes of ILCGs (and Policy DM25) are to:   
**maintain the separate identities and character of settlements by preventing their merging;**   
**safeguard the open and undeveloped character of the areas**;   
**prevent encroachment and piecemeal erosion by built development or changes to the rural open character**; and   
**influence decisions on the longer-term development of settlements through the preparation and review of Local Plans**.

This development is not part of the Local plan; It will cause a merger of identities of settlements; It will develop the open and undeveloped character of the area and it will forever change the rural open character. It does not fulfil a single heading for ‘Important Local Countryside Gap’ areas. This is perhaps best summed up in Policy DM25.

# Impact on Countryside and Recreational amenities

The Developments as proposed covers a vast area of existing rural land. This area, especially in the last 18 months, has provided a green lung and refuge for many walkers, cyclists, horse riders and the likes. This is a core planning principle of the NPPF and is recognised in the Swale Local Plan Para 7.5.1:-

One of the core planning principles in the National Planning Policy Framework (NPPF) is to improve health, social and cultural wellbeing for all. In terms of promoting healthy communities the NPPF recognises that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities.   
…  
Existing open space, sports and recreational buildings and land, including playing fields, should not be used for built development other than in exceptional circumstances

There are a number of Public Footpaths identified in the Landscape proposals that will either be lost or require significant realignment; This will be a significant loss of recreational and countryside amenity.   
The alternative is that Public Footpaths will turn in to roads, with cars passing far more frequently that currently in Rural Lanes, which themselves (where retained) will be busier. This increases the potential risk to any walker, cyclist or horse rider.