

Paragraph 5.5.50 Developing a Teynham Masterplan

Here we find the commitment to what is essentially an administrative blueprint - a “masterplan”, which encompasses 18 components.

The “masterplan” lays out how the ‘facts on the ground’ created by inclusion of the TAO and Policy AO1 we be “informed by the needs of the community”. SBC exhibits the brass-necked cheek of placing value on a process of consultation that should have taken place before introduction into the Local Plan. Frankly, as the TAO and Policy AO1 are described as SPG, the whole concept should have been explored outside the Local Plan or addressed by the same tests as the Local Plan. Of course, there is a fatal flaw in that theory – the Local Plan is being consulted on without key policy documents and evidence in place for the whole Plan and its components

Talking about this flaw, SBC Officers and Councillors’ defence has been – (I paraphrase) “that’s OK because we have been honest about our failings” but not honest enough to actively engage with those most affected. SBC thought it could ‘carry the day’ without opposition.

Planning Inspector (PINS) Guidance and Planning Advisory Service (PAS) make it clear that the document put out to consultation should be complete, legal, consistent and accompanied by complete evidential support in place.

PINS expects that draft Local Plans that are put out to Consultation (properly described as the pre-Determination Local Plan – in other words, capable of approval as being sound and legal) should be the same as the documents they are asked to decide upon (“determine”). Swale Borough Council has launched Regulation 19 prematurely and dishonestly by leapfrogging over our realistic expectation that we would be able to consider the Issues and Options used to arrive at a “Draft Local Plan before it is put into the “Publication Stage” (Reg19) when the document would be ready to print, subject only to a national Inspector’s “determination” that it is legal and “sound” using the four tests found in NPPF.

Swale Borough has failed in each regard of:

- Process – skipping Reg18b (Issues and Options) consultation; forcing the TAO and associated Policy AO1 into the Local Plan to tie the hands of residents and parish councils; striving to deceive residents and parish councils by a policy of “passive discovery” masquerading as “openness” through their impossibly dysfunctional website; punctuating the Local

Plan process by placing a series of obstacles in the way of residents and parish councils. More than 11 parish councils cried “foul” after being alerted to SBC’s subterranean behaviour; SBC initially refused to shift from the legal minimum of six weeks consultation; when, finally, the LPP Chairman was shown the error of his ways, he asked Council for an extension to 30th April but objected to the cost of writing to all residents of Swale informing them of the Reg19 Consultation; failing to provide explanatory material, or any other means of helping residents understand what they were facing until more than six weeks after the initial launch; and very late in the day Officials and Councillors discovered a conscience and agreed to share in Zoom Meetings arranged by everyone other than SBC itself. Awareness raising was achieved ONLY by the effort of residents through social media and parish councils through newsletters to their parishioners – SBC has been singularly silent and revealingly unprepared for public engagement.

- Content – there is much of great value in the Local Plan but the whole Plan has to be declared “unsound” because SBC has tried to embed an untested (never been the subject of a Reg18 consultation), undeliverable bypass tied to out-of-scale development allocations – the Teynham Area of Opportunity (TAO). They have done this with total disregard for the damage caused to communities on the A2 by burying the TAO allocations and Policy AO1 as Supplementary Planning Guidance at the heart of the Local Plan; and
- Scope – making heroic assumptions about human behaviour (e.g., in respect of “active travel”) and over-egging the impact of their attempts at social engineering in a rural context when the instruments they are promoting (“active travel”) are better suited to urban environments (a view expressed by HM Government). The ‘green agenda’ is conveniently abandoned when they decide to **“build for cars”** in order to dump 1,100-1,400+ in the worst possible place in Swale! The constant demonisation of Conservative Councillors and a deep-rooted hatred of Quinns has fractured the Local Plan.

It is my belief that the TAO and Policy AO1 should be removed ‘root and branch’ from the Local Plan as it is demonstrably misguided, tendentious, uninformed by community involvement, uninformed by parish councils, and severely damaging to the fabric (and residents) of Ospringe (AQMA6), Teynham Village (AQMA5), the Lynsted with Kingsdown community along the edge of the A2 (AQMA5), Bapchild, and East Street (AQMA 3).