

Planning Report for 27 October 2020 Newington Parish Council Meeting

This month's applications

Application: 20/504568/LAWPRO .19 Dennis Willcocks Close, Newington ME9 7SE

Proposal: Lawful Development Certificate for a proposed single storey rear extension
Application Received: Friday 2 October 2020
Application validated: Wednesday 2 October 2020
Status: awaiting decision

Application: 20/504715/FULL White Lodge, Keycol Hill, Bobbing ME9 7LE

Proposal: Conversion of the existing garage into residential accommodation. Erection of a new double garage with accommodation above.
Application received: Friday 9 October 2020
Application validated: Tuesday 13 October 2020
Status: Awaiting decision

Application: 20/504596/FULL Oak Hill House, Iwade Road, Newington ME9 7HY

Proposal: Conversion of the existing outbuilding to ancillary use as an annexe and erection of a single storey extension, improvements to the access.
Application received: Monday 5 October 2020
Application validated: Tuesday 20 October 2020
Status: Awaiting decision

Application: 20/504800/FULL 71 Playstool Road Newington ME9 7NL

Proposal: Erection of single storey side and rear extensions, including loft conversion with front dormers..

Application received: Wednesday 14 October 2020

Application validated: Monday 19 October 2020

Status: Awaiting decision

Application: 20/504801/LAWPRO 71 Playstool Road Newington ME9 7NL

Proposal: Lawful Development Certificate for a proposed loft conversion with rear dormer.

Application received: Wednesday 14 October 2020

Application validated: Monday 19 October 2020

Status: Awaiting decision

From Planning Committee Meeting Tuesday 13 October 2020

Application: 20/501475/FULL Land Rear Of Eden Meadow, High Street Newington ME9 7JH

Revised Proposal: Erection of 35 No. residential dwellings including affordable housing and associated car parking, hardstanding, landscaping and open spaces, infrastructure including SuDs and earthworks accessed from the existing junction serving Eden Meadow from the A2 High Street.

Notification by letter from Swale Borough Council dated 25 September 2020

'We have received revised details concerning this application.

Amended Plan and Additional information received 17.09.20'

Original Proposal: Erection of 40 No. residential dwellings including affordable housing and associated car parking, hardstanding, landscaping and open spaces, infrastructure including SuDs and earthworks accessed from the existing junction serving Eden Meadow from the A2 High Street

Application received: Thursday 26 March 2020

Application validated: Monday 30 March 2020

Status: awaiting decision

(18 June 2019 Swale Design Review Panel meeting: Proposed residential development – Land at Ellen's Place, Newington. Followed by Community Consultation Mail-out 15 July 2019 – Design Review Panel confidential report

18 November 2019 conversation with Andy Wilford, Head of Planning, Esquire Developments

14 January 2020 NPC Planning Committee Meeting to hear draft proposals)

9 April 2020 Newington Parish Council Planning Committee meeting – unanimous decision to oppose the application

15 April 2020 response published on Midkent planning portal and NBC website

From Planning Committee Meeting Thursday 22 October 2020

SHLAA for Newington

Strategic Housing Land Availability Assessment discussed at Thursday 22 October Newington Parish Council Planning Committee (Zoom)

From last month

Application: 20/504132/FULL 37 London Road, Newington ME9 7NS

Proposal: Conversion of existing detached two storey garage into a two bedroom dwelling together with a single storey extension.

Application received: Tuesday 8 September 2020

Application validated: Tuesday 15 September 2020

Status: Awaiting decision

Application: 18/503053/NMAMD

Proposal: Non Material Amendment Being Revision to Detached Garage with Study/Office Above and Side Extension on Previously Approved Application 17/503011/FULL and Alteration of Ground Floor Rear Fenestration to Existing House 17/506133/FULL

Application Received: Wed 06 Jun 2018

Application Validated: Thursday 14 June 2018

Status: Application permitted Friday 29 June 2018

Application: 17/506142/NMAMD

Proposal: Non-material amendment: Side elevation doors & window replaced with one continuous bi-fold. Two windows added to the side elevation of proposed extension first floor & window, & door to rear mirrored (original application ref: 17/503011/FULL).

Application Received: Monday 27 November 2017

Application Validated: Monday 27 November 2017
 Status: Application withdrawn Thursday 14 December 2017

Application: 17/506133/FULL

Proposal: Revision to detached garage with study/office above and side extension on previously approved application 17/503011/FULL. Alteration of ground floor rear fenestration to existing house.

Application Received: Monday 27 November 2017
 Application Validated: Monday 18 December 2017
 Status: Application permitted 9 February 2018

Application: 17/504812/NMAMD

Proposal: Non-material amendment for planning permission 17/503011/FULL. Rotating the detached garage in order to line through with the existing property. Dormers added to front and back of garage. Window to London road garage elevation turned into a door and new door into garage. Juliet balcony to be replaced with normal balcony with 2 piers either side for support. Side elevation doors and window replaced with one continuous bi fold. Two windows added to the side elevation first floor and window and door to rear Application Received:

Monday 18 September 2017
 Application Validated: Tuesday 18 September 2017
 Status: Application refused Monday 16 October 2017

Application: 17/503011/FULL

Proposal: Demolition of existing side conservatory, erection of replacement two storey side extension with front Juliet Balcony, erection of double garage with study in roof space and creation of new access and drop kerb

Application Received: Thursday 8 June 2017
 Application Validated: Thursday 15 June 2017
 Status: Application permitted Thursday 10 August 2017

Application: 20/504184/FULL Bardfield Barn, London Road, Newington ME9 7TW

Proposal: Erection of a car port and home office (Class E) with associated hardstanding.
 Application received: Wednesday 9 September 2020
 Application validated: Tuesday 22 September 2020
 Status: awaiting decision

Appeal to the Planning Inspectorate

Application 19/503203/FULL Land At 6 Ellens Place, Boyces Hill, Newington ME9 7JG

Proposal: Erection of a chalet bungalow with detached garage. Creation of new vehicular access and erection of a detached garage to serve no. 6.

Application received: Friday 21 June 2019
 Application validated: : Friday 21 June 2019
 Status: Application refused Monday 18 November 2019
 Appeal notification 1 July 2020 PINS reference: APP/V2255/W/20/3250073

Application: 19/500029/FULL Land Rear Of 132 High Street, Newington ME9 7JH

Proposal: Erection of a 4 bedroom detached dwelling and associated carport/garage.

Application received: Thursday 3 January 2019
 Application validated: Monday 28 January 2019
 Status: Application refused Wednesday 27 November 2019
 Appeal notification 6 May 2020 PINS Reference: APP/V2255/W/20/3247555

18/500767/FULL Newington Working Mens Club, High Street, ME9 7JL

Proposal: Variation of Condition 2 and removal of Condition 11 of application 17/504342/FULL (Retrospective demolition of former Working Mens Club and erection of 9no. dwellings and 1no. maisonette together with carports for garaging of cars (Revised scheme). (Vary Condition 2 to include reference to 'Titan-Sonair' ventilation system to bedrooms and dining room fronting the high street.)
 Application received Wednesday 7 February 2018
 Application validated: Wednesday 14 March 2018
 Decision: application refused Tuesday 12 June 2018
 Appeal lodged with Planning Inspectorate: 24 January 2019
 Appeal decision 5 July 2019 – appeal allowed (but...*'I conclude that Condition 11 should not be removed, but should be varied to simply require that all windows on the front façade of the block fronting onto the High Street shall be non-openable only. I do not agree that Condition 2 should be varied and this element of the appeal fails'*)
 Update from Enforcement Officer February, March, May 2020
 26 June 2020 update from planning enforcement
 19 October 2020 further verbal update

Application: 19/502206/FULL 61 Playstool Road, Newington ME9 7NL

Proposal: Retrospective application for the erection of a first floor rear extension, loft extension and lean to roof at front and side of dwelling (resubmission of 18/502531/FULL).
 Application received: Tuesday 30 April 2019
 Application validated: Tuesday 25 June 2019
 Status: Application refused Wednesday 14 August 2019
 Application: 18/502531/FULL 61 Playstool Road, Newington ME9 7NL
 Proposal: Erection of a first floor rear extension and loft extension with front dormer (Retrospective works to 16/503414/FULL).
 Application received: Thursday 10 May 2018
 Application validated: Tuesday 3 July 2018
 Status: Application refused Wednesday 6 February 2019
 23 July notification of revised details
 Application: 18/502775/FULL 61 Playstool Road, Newington ME9 7NL
 Proposal: Erection of a large shed at the end of rear garden (Retrospective)
 Application received: Wednesday 23 May 2018
 Application validated: Tuesday 12 June 2018
 (NB Previous application withdrawn 15 May 2018)
 Status: Application permitted 27 July 2018
 Appeal notification 17 December 2019 PINS reference: APP/V2255/D/19/3240474
 Start date 16 December 2019 – Written representations procedure
 10 February 2020 –Appeal decision – appeal dismissed
 21 May 2020 update from planning enforcement
 Further verbal update October 2020

Previously discussed: for information**Application Number SW/16/507594/RVAR (KCC/SW/0526/2018)****Paradise Farm, Lower Hartlip Road, Hartlip, Sittingbourne ME9 7SR**

Email: 26 November 2019: Wienerberger is currently installing the initial part of the access road behind Newington Industrial Estate in order to implement the planning permission and that other than occasional HGV deliveries of supplies to facilitate this work there should be no major impact or overlap of HGVs with the SGN works. This initial work is planned to be completed by the end of December 2019. He informs me that Wienerberger intends to install the rest of the internal haul road to the extraction areas during Spring / Summer 2020 and that no brickearth extraction is planned until Spring / Summer 2021.

Not in Newington

Application: 20/502218/OUT Home Farm, Breach Lane, Lower Halstow ME9 7DB

Proposal: Outline Application with all matters reserved for the proposed development of six houses and three bungalows.

Application received: Tuesday 26 May 2020

Application validated: Thursday 28 May 2020

Status: Awaiting decision

17/505711/HYBRID Land at Wises Lane Borden Kent ME10 1GD

Hybrid planning application with outline planning permission (all matters reserved except for access) sought for up to 595 dwellings including affordable housing; a two-form entry primary school with associated outdoor space and vehicle parking; local facilities comprising a Class A1 retail store of up to 480 sq m GIA and up to 560sqm GIA of "flexible use" floorspace that can be used for one or more of the following uses - A1 (retail), A2 (financial and professional services), A3 (restaurants and cafes), D1 (non-residential institutions); a rugby clubhouse / community building of up to 375 sq m GIA, three standard RFU sports pitches and associated vehicle parking; a link road between Borden Lane and Chestnut Street / A249; allotments; and formal and informal open space incorporating SuDS, new planting / landscaping and ecological enhancement works. Full planning permission is sought for the erection of 80 dwellings including affordable housing, open space, associated access / roads, vehicle parking, associated services, infrastructure, landscaping and associated SuDS.

For clarity - the total number of dwellings proposed across the site is up to 675 -

Public Planning Inquiry: November-December 2019

13 February 2020 notification that Inspector's report sent to Secretary of State for consideration

Decision to be issued on or before 18 May 2020

Letter 18 May 2020 'regrettably, the Secretary of State will not be in a position to publish a decision by this date.'

Application: 18/505060/ADJ (Alternative reference: 18/504836/EIOUT) Binbury Park, Detling Hill, Detling, Maidstone, Kent

Proposal: Adjoining Authority Consultation from Maidstone Borough Council for Outline application (with all matters reserved apart from access) for the erection of up to 1,750 dwellings including affordable housing, 46,000 sq.m of commercial space, a hotel, a local centre, a new primary school, a park and ride facility, strategic highways improvements including new Kent Showground access/egress, accesses/roads including a new bridleway bridge, parking, associated open space, landscaping, services, and Sustainable Drainage Systems. In addition the proposals include a publicly-accessible country park including the Binbury Motte and Bailey Castle Scheduled Ancient Monument.

Application received: Friday 28 September 2018

Application validated: Friday 28 September 2018

Status: (SBC Response – No objections – 18 December 2018) awaiting decision

Stephen Harvey
Chair of Newington Parish Council Planning Committee
23 October 2020

Appendix: Responses sent following 29 September 2020 Newington Parish Council Meeting

Application: 20/504184/FULL Bardfield Barn, London Road, Newington ME9 7TW

Proposal: Erection of a car port and home office (Class E) with associated hardstanding.

Newington Parish Council considered this application at the September meeting. There is no objection to the application save that any comments from neighbouring properties should be taken into consideration.

We would however request that, if the planning officer or planning committee decide to approve the application, the condition be added that the building shall not be occupied at any time other than for purposes ancillary to the residential use of the main house, Bardfield Barn.

Application: 20/504132/FULL 37 London Road, Newington ME9 7NS

Proposal: Conversion of existing detached two storey garage into a two bedroom dwelling together with a single storey extension.

Newington Parish Council discussed this application at the September meeting.

Newington Parish Council objects to this application.

This is the latest in a series of planning applications for this property and some may view it as the use of the planning process to create an additional dwelling through stealth.

The Parish Council believes the setting inappropriate: very close to the busy A2. As well as being inappropriate to the established streetscape and to a Village setting, The Parish Council believes the design to be poor as it would create a cramped house and impinge on the setting and visual amenity of the existing dwelling and that of neighbouring houses.

We would however request that, if the planning officer or planning committee decide to approve the application, the condition be added that the building shall not be occupied at any time other than for purposes ancillary to the residential use of the main house 37 London Road, Newington.

We note that the new fence to the east of the property has a side gate and that the occupier uses this for access to the green space on which he stores his wheelie bins. We request that this infringement be notified to the relevant enforcement officer.

Application: 20/501475/FULL Response from Newington Parish Council

Application: 20/501475/FULL Land Rear Of Eden Meadow, High Street Newington ME9 7JH

Proposal: Erection of 35 No. residential dwellings including affordable housing and associated car parking, hardstanding, landscaping and open spaces, infrastructure including SuDs and earthworks accessed from the existing junction serving Eden Meadow from the A2 High Street

This document supplements the previous response from Newington Parish Council; it does not supersede it.

Newington Parish Council maintains its objection to this application.

Whilst acknowledging that the latest application is slightly smaller (35 instead of 40 homes) this reduction is minor and the proposed development would have an overbearing and detrimental effect on our village. We still sense and fear the threat of an enlarged scheme at some stage in the future. The plans published in September labelled land beyond the perimeter as '*potential access to neighbouring land*'. This was described as a mistake by Esquire Developments (Newington Parish Council Planning Committee meeting – 13 October) and revised plans have been subsequently issued. However it was made clear at a public meeting in January 2020 that Esquire developments either owned or had options on neighbouring land together with additional access to the A2 for a larger development.

Therefore all original objections remain, but would wish to note the following:

Planning decisions for this site and an adjacent site

The original application, 16/505861/OUT, for this site (9 dwellings) was rejected by the Planning Committee on the advice of officers. We would still agree with all the objections in the report to the 2 February 2017 Swale Borough Council Planning Committee meeting.

The original application was only allowed following appeal to the planning inspectorate.

This site was not in the June 2016 proposed modifications to the Swale Plan, examined in public and found to be sound in Summer 2017. It is therefore a premature application.

A later appeal for 3 homes on an adjacent site (100 metres closer to the Village centre, also south side of the A2) at 148 High Street, Newington, was dismissed by the Planning Inspectorate in January 2018. A further application (conversion of former agricultural barn and associated lightweight structure to a dwelling house with furniture restoration workshop and home office, associated storage, car parking and access driveway) was refused on 24 January 2020. The subsequent appeal was dismissed by the planning inspectorate on 14 August 2020. (Appeal Decision APP/V2255/W/20/3245359)

6. Bearing Fruits 2031: The Swale Borough Local Plan 2017 (the Local Plan) has defined its built-up area boundary and Policy ST3 of the Local Plan seeks to provide new homes in accordance with the settlement hierarchy for the Borough. Part 5 of Policy ST3 states "*At locations in the countryside, outside the built-up areas boundaries as shown on the Proposals Map, development will not be permitted, unless supported by national planning policy and able to demonstrate that it would contribute to protecting and, where appropriate, enhancing the intrinsic value, landscape setting, tranquillity and beauty of the countryside, its buildings and the vitality of rural communities*".

7. Given that the site's location would be outside the built-up area boundary of Newington, the appeal site would not be an appropriate location for residential development.

8. ..The land immediately to the south is open countryside. To the west the land behind the rear gardens of properties fronting onto High Street is open and undeveloped.

9. There is a clear change in character between the existing urban related development fronting High Street and the open land to its south. ...

10. It would result in a diminution of the rural character and appearance of the area and negatively impact upon the tranquillity and beauty of the countryside.

12. For the above reasons, I conclude that the proposed development would not be an appropriate location for a new dwelling with workshop having regard to the spatial strategy of the development plan. Furthermore, the proposed development would have a harmful effect upon the character and appearance of the countryside. The proposal would, therefore, conflict with Policies ST1, ST3, DM9 and DM14 of the Local Plan. These policies seek, amongst other matters, development to support the aims of sustainable development, adhere to the Council's settlement strategy and to conserve and enhance the countryside.

18. ...the proposal would harm the rural character and appearance of the countryside.

We understand that Swale currently has a 4.6 year supply (ie an annual shortfall of 310 homes) and would submit that this is close enough for the harm from this proposed development to outweigh the need.

Swale Borough Council and NPPF Policies relevant to this proposal

This proposal is not part of the Swale Borough Council plan and would be a 'windfall' development that ignores the principles that underpin the local plan by increasing air pollution, exacerbating traffic problems and reducing 'bmv greenfield' land.

The proposed development was rejected in appeal for sites

Rejected at Local Development Framework Panel – May 2016

- a pleasant area of pasture with attractive views southward to higher ground.
- could give rise to moderate to significantly adverse visual impacts
- has fairly poor physical connectivity and accessibility to the village
- would read more as a consolidation of A2 ribbon development and the filling of a pleasant gap rather than as a logical extension to the village.
- It is not recommended as a priority for allocation at Newington

The Local Plan, Policy ST 3 identified Newington as a Tier 4 Rural Local Service Centre with noted limitations to expansion, so the village was allocated a growth rate of 1.3%. The 2017 edition of the Local Plan reiterated the restrictions on growth with the single exception of "Land North of the High Street".

Total already built in Newington 2014 to now is 180 properties

- a. For the target six years to date that is **297.5%**
- b. Or for the full 17 year quota that is already **105.3%**

This application is outside the built-up area and would create ribbon development (see policies E6 RC3).

The proposal does not meet the definition of sustainable development in rural areas

The land is not a 'brownfield' site. Instead it is 'Best and most versatile' agricultural land that has been left idle possibly in the hope of future permission for building.

The effects on the countryside and the visual amenity for residents of Newington

This proposal would lead to serious loss of visual amenity (footpaths ZR65 and ZR67/1). NB the Pond Farm Inquiry (subsequently upheld by the High Court and Court of Appeal): where the Inspector decision was that the proposals would have caused substantial harm to the landscape character and form of Newington.

Swale Borough Council's October 2019 Landscape Sensitivity Assessment

'Cranbrook Wood is priority habitat deciduous woodland'... acts as an important rural gap between Sittingbourne and Newington.'

There is also a further detrimental effect on the grade II listed building Ellen's Place

Newington Parish Council has not had sight of the original comments of the Swale Conservation Officer, but the 'Heritage Addendum' dated 17 September 2020 states:

The site is located immediately to the south of the grade II listed building known as Ellen's Place...The original outline application for 9 dwellings (allowed on appeal) and the subsequent reserved matters application failed to take adequate account, and as a result, the setting of this listed building has been harmed...through the suburbanisation of its setting. The proposed additional housing area would (as the proposal stands at present) exacerbate this impact through the process of cumulative change

I continue to have concerns about various design aspects of the proposal, including the siting and design of the proposed houses and flats and their juxtaposition with the road layout, my primary concern at this juncture remains the principle of allowing an extra 40 houses at this location, particularly when it is clear that there is an ambition to ultimately develop significantly beyond this. I believe my initial view and concern in this respect is effectively backed up by the conclusions set out in the David Huskisson landscape review report which inter-alia references the '*...tightness of the development in relation to its open countryside boundaries where either vegetation is proposed to be retained or augmented or new planting provided. There is simply not enough space to deliver an appropriately robust landscape structure on the present layout*'.

The applicant's heritage consultant makes reference to this document (Historic England Good Practice in Planning Advice Note 3 on The Setting of Heritage Assets 2nd. Ed, Dec. 2017) but his assessment is in my view compromised in its degree of authority because of the failure to carefully and methodically work through the five steps (1-4 of which are for the applicant to action) provided in the guidance to allow for an objective conclusion to be reached. Furthermore, he has failed to completely take into account the section of the guidance which requires cumulative change to setting to be taken into account and factored into the assessment on the degree of (in this case) harm that would arise.

The proposed development would impact on views across the open countryside from public footpath ZR65 looking northwards towards the A2. If the proposed development is approved as shown, it is very clear that this view of the listed building from this footpath will be lost and replaced with a strong sense of creeping urbanisation into the countryside separating Newington from Keycol. The concerns raised in this respect are not dissimilar to those raised by the planning officer in the report to planning committee on the 2016 outline application. I therefore strongly object to this application on principle for the reasons outlined above,

Landscape and Ecology

Newington Parish Council has some questions regarding the revised Landscape and Biodiversity Plan, and the Ecological Impact Assessment:

It was good to read that there had been a follow-up to the Preliminary Ecological Appraisal from the site survey undertaken on 20th February.

We note though:

- The reptile assessment was fairly limited in duration so might not have picked up the site being used by non-resident amphibians and reptiles later in the year. The Great Crested Newt assessment seems reasonable in a landscape context.
- 7.32 A potentially dubious statement given the apparent lack of investigation, including of established oak and cherry which may house invertebrates living in standing dead wood, rot holes, etc.
- 7.33 When was this plant diversity assessed? Would significant species have been evident? Everything else seems to have been done in the Spring.
- Will bird and bat boxes be carefully sited to prevent overheating and encourage use?
- Where does responsibility for future management of meadow/wet grassland lie?
- Is there any requirement/mechanism for buyers to maintain movement gaps on fencing, and bird or bat boxes? What education of buyers as to their importance will be provided?

We welcome the prospect of adding yellow loosestrife to Newington but there is nothing on the creation or maintenance of a wildflower meadow of reasonable size, maintaining the pond for water quality and removal of rubbish and any unwelcome creatures. The landscape strategy does mention Acer (medium sized native) and Sorbus Aria (medium sized native) trees, but there seems to be no intention to add larger long-lived native trees or hedgerow smaller trees. There is no S106 information on a contribution to supporting wider biodiversity in Newington or creating/supporting new wildlife corridors to keep the landscape connected. This would be necessary to ensure some legacy to what seem good intentions in the Biodiversity Plan.

Air Quality in Newington

There is some confusion as to the number of homes being considered in the Lustre Consulting Air Quality Report dated July 2020.

This concludes:

6.11 The total damage cost is £17,754 over five years from 2019. This is an estimate of the costs to society due to the impact of increases in emissions associated with the proposed development. As defined by the IAQM/EPUK guidance¹⁶ the damage cost relates to the value of mitigation that should be applied, preferably on-site.

This calculation is followed by a litany of trite suggestions such as ‘welcome pack’ and ‘car club’. None of these will benefit the health of residents, especially children, in the village centre. There are no positive or concrete suggestions as to the improvement of air quality locally.

The proposal would be detrimental to the health of residents of Newington. The submitted reports do not adequately address the cumulative effect on air quality of 124 homes nearing completion at Watling Place, the existing 9 Homes in Eden Meadow, and now the proposed

35 additional homes. One of the two reasons why the Pond Farm appeal was refused after the Planning Inquiry in November 2016

See Pond Farm Inquiry - Appeal decision date 9 January 2016 Appeal Ref:

APP/V2255/W/15/3067553 and APP/V2255/W/16/3148140 (subsequently upheld by the High Court and Court of Appeal):

‘even after taking into account the proposed mitigation measures, the appeal proposals would have an adverse effect in air quality, particularly in the Newington and Rainham AQMAs (proposals conflict with NPPF paragraphs 120 and 124)’

The Court of Appeal decision [EWHC 2768 (Admin)] 12 September 2019 (between Gladman Developments and Secretary of State for Communities and Local Government, Swale Borough Council & CPRE Kent

71. It was not unreasonable to think that the section 106 obligations represented the basis on which he was being invited to conclude that the financial contributions and proposed mitigation measures were adequate and would be effective. His conclusions show very clearly that he was unconvinced by both parts of the mitigation strategy – the financial contributions and the mitigation measures themselves.

77.... As Dr Bowes submitted, an essential purpose of the air quality action plans was to improve air quality in the Air Quality Management Areas, which, as the air quality action plan for Newington made quite clear, might require planning permission to be refused where effective mitigation could not be secured. Proposed development such as this, judged likely to worsen air quality in a material way because the proposed mitigation had not been shown to be effective, was inevitably inconsistent with the air quality action plans.

The Lustre report does not demonstrate how its proposed contribution would mitigate against the likely harm to human health through increased pollution.

On 7 May 2020 Medway Council objected to the application

The air quality assessment submitted fails to demonstrate that the proposal would not have an unacceptable impact upon the Rainham Air Quality Management Area contrary to Policy BNE24 of the Medway Local Plan 2003 and the provisions of Paragraph 181 of the National Planning Policy Framework 2019.

The 20 April 2020 Environmental Protection Report informs the intention for the ...

declaration of an AQMA in the Keycol Hill area in response to exceedances shown in 2019. Therefore, I would recommend that a revised AQA is necessary to include 2019 data and the additional tubes to be included in the model. This is due to the significant air quality sensitivity that exists currently in the area and the need to address the worst case scenario.

Receptors that show moderate or substantial are R4; R5; R7; R14; R15. All receptors which show the highest impact on air quality are within the Newington AQMA.

There are therefore concerns about air pollution to the east and west of this proposed development, currently in open countryside, with AQMAs 300 yards and 2 miles west and the proposal for a new AQMA 1 mile to the east.

Other remaining concerns

The proposal would be likely to create problems of access with a new, dangerous junction with the A2 almost opposite the new junction for 123 Persimmon homes at Watling Place

The access / egress at the A2 into Eden Meadow is acceptable at 5.5m. However current residents park their cars outside their properties, with visitors' vehicles parked beside kerbs, meaning there is a restricted width for vehicles to pass. The actual access into the proposed rear of Eden Meadow is only 4.8m, which does not allow sufficient width for certain vehicles. The quoted '*Kent Design Guide: Designing for Movement*' states 'carriageway width not necessarily constant but there should be sufficient space for two cars to pass each other at least every 40m'. The Parish Council believes that the existing access / egress cannot support both the current site with its day to day activities and the proposed development.

In addition to existing parking problems at Eden Meadow we believe that there is insufficient parking for the proposed properties, done in order to make the development look good on the plans and ignoring what would be reality. There are similar concerns about the predicted traffic movements should the application be approved.

Our original objections stand regarding the transport assessment. In this we give details of the actual train and bus services in Newington.

In the original objections we questioned the measurements used for children to reach Newington School and the fact that that these young children would have to walk along the busy, polluted A2 and cross long before the pedestrian crossing in order to reach a pavement for the remainder of their journey. This has become an academic point as the School is now full and closed to new admissions. Therefore children would need to enrol in Rainham or Sittingbourne for both Primary and Secondary education. Inevitably this would result in increased traffic movements and increased air pollution.

The proposed housing estate outside the established built-up area of the village cannot be described as 'sustainable development' as defined by the NPPF. It may be a short walk to the village in measured distance but is a difficult and dangerous one in practice. Our school is full and the GP surgery is not accepting new patients. We believe residents would drive to schools, doctors, shops and the better rail services from Rainham and Sittingbourne; that they would ignore the bus service which is very limited in terms of route and regularity; therefore increasing pollution further. The proposal does nothing to improve the *economy* of Newington, there are no obvious *social* benefits and clear *environmental* harm

Newington Parish Council requests that, in the event of the planning officer recommending approval, our original (15 April 2020) response and this addendum be forwarded to all members of planning committee as well as the customary summary in the officer report.

This document supplements the previous response from Newington Parish Council; it does not supersede it.

Stephen Harvey
Chair of Newington Parish Council Planning Committee
23 October 2020