



BOUGHTON-UNDER-BLEAN PARISH COUNCIL

Minutes of the ordinary meeting of the Parish Council held at St Barnabas Parish Centre on Tuesday 9th July 2024 from 7:30pm to 8:33pm.

Present:

Cllr T. Covell (Chairman), Cllr S. Moakes, Cllr S. Harper

Also present:

Mrs R Parr (Locum Clerk) and Cllr A. Gould (Swale Borough Council)

220. Apologies

- A. Apologies received from Cllr P. Ray, Cllr I. Linfield, Cllr J. Muteham, Cllr D. Clayson, Cllr R. Lehmann (Kent County Council), Mrs S. Muteham (Clerk)
- B. Reasons for absence approved. **Resolved:** to accept apologies for absence from Cllr P. Ray and Cllr I. Linfield. Cllr J. Muteham.
- C. Cllr S. Harper advised that Cllr K. Harper had resigned.

221. Declaration of Interests

None

222. Minutes

The minutes of the following meeting, having been circulated to all Members, were taken as read and confirmed by the chairman of the meeting.

- A. Minutes of the ordinary meeting of the Parish Council held on Tuesday 11th June 2024 (minutes 212-219)

Resolved: the minutes of the meeting held on Tuesday 11th June 2024 were approved.

A report containing minutes of the following meeting was circulated to all Members.

- B. Draft minutes as a report of the Village Hall Management Committee (VHMC) meeting held on Tuesday 25th June 2024

Resolved: to accept the report of the committee meeting held on Tuesday 25th June 2024.

223. Public Participation

Cllr Gould raised the issue of the grass cutting that would have been undertaken by the contractor on his private boundary if he had not been there to intervene. The Councillors expressed dissatisfaction that the self-sown wildflowers had also been removed rather than the contractor using their discretion to leave. **Action:** It was agreed to add the topic of grass cutting to the next meeting agenda.

224. Finance and Administration

- A. Bank reconciliation - The bank reconciliation dated 30th June 2024 was circulated at the meeting and approved by those present. **Resolved:** the bank account balances and reconciliation were approved.
- B. Items for payment - All payments as detailed on the bank reconciliation dated 30th June 2024 were approved by those present at the meeting. **Resolved:** the payments as detailed in [Appendix A](#) were approved for payment.
- C. Finance Report – The Finance Report for Q1 2024/5 as detailed in [Appendix B](#) was circulated and approved by those present at the meeting. Cllr T. Covell explaining the timings of the recent precept makes the position look positive but that the funds needed to last until the next precept instalment in September. **Resolved:** the Q1 Finance Report as detailed in Appendix B was noted and approved.

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- D. Scheme of Delegation – The Scheme of Delegation detailed in [Appendix C](#) was circulated and ratified by those at the meeting. **Resolved:** the Scheme of Delegation as detailed in Appendix C was approved.
- E. Convex mirror – Following the June Council meeting where the Clerk reported a resident request for a convex mirror at the junction of Colonels Lane/The Street to enable safer pedestrian crossing at the junction and the Councillors discussed and agreed to investigate the matter prior to further consideration at the July meeting. Further deliberation continued and it was agreed to consider where the post for the mirror could be added to private land. Action: Cllr T. Covell would speak to the parishioner concerned and the Council to investigate costings. **Resolved:** to bring back to the next Council meeting.

225. Public Amenities Matters

- A. Toddler Playground - Members present discussed, approving the quote for ground/base repairs as detailed in [Appendix D](#), and to accept the Clerk’s recommendation for claiming off the insurance if the vandalism extends again before the work is completed. **Resolved:** the quote detailed in Appendix D was approved.
- B. Goal Posts – Members present discussed, approving the quote detailed in [Appendix D](#) for the installation of additional goal post sockets. **Resolved:** the quote detailed in Appendix D was approved.

226. Planning

24/502123/EIOUT Land North And South Of The A2 Boughton Bypass Dunkirk (Winterbourne Fields) - Cllr S. Harper and Cllr S. Moakes noted that they had attended the public consultation held by Dunkirk Parish Council on the 1st July 2024. Members present discussed and unanimously agreed to object to the planning application with the comments as detailed in [Appendix E](#). **Resolved:** to object to the planning application.

227. Councillors Reports

Cllr T. Covell commented that he was still waiting on news from the conservation officer and KCC Highways regarding the seat in Arthur Kennedy Close.

Cllr S. Harper expressed concern over the recent incident concerning access to Poplar View by an ambulance. Following a discussion, it was agreed to add this to the agenda at the next meeting. **Action:** Cllr T. Covell requested the Clerk to write to SECAMB to suggest a way forward.

The Clerk read out an email from Cllr Lehmann providing an update on the bin collections.

228. Chairman/Clerk’s Reports

The Clerk’s report was received by those present and is detailed in [Appendix F](#).

The next ordinary meeting of the Parish Council was scheduled for Tuesday 10th September 2024 at 7:30pm. There being no further business, the Chairman declared the meeting closed.

Signed by the CHAIRMAN of the meeting

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APPENDIX A

Castle Water (Public toilets) - (D/D estimate for information only)	£34.83
Castle Water (Cemetery) - (D/D estimate for information only)	£15.78
Lloyds Bank (Chargecard) - (D/D for information only)	£148.80
British Gas (Public toilets) - (D/D estimate for information only)	£30.72
Staff costs – (D/D estimate for information only)	£2,257.45
Bk Tfr - Bourne to Garden - Mowing (Cemetery/Pop View)	£1,160.40
Bk Tfr - Countrywide Grounds Maintenance - Mowing/Knotweed (Bull Lane/The Street)	£792.30
Bk Tfr - Boughton under Blean Village Hall - Meeting Room Hire/Social Hubs	£225.00
Bk Tfr - S. Morrow - Toilets - Cleaning (June)	£712.80
Bk Tfr - T. Covell - Councillors Allowance Q1-2024/25	£169.65
Bk Tfr - J. Muteham - Councillors Allowance Q1-2024/25	£84.83
Bk Tfr - ICCM - Annual membership	£100.00
Bk Tfr - Business Stream - Waste water (Mar-Jun)	£91.07
Bk Tfr - Seton - Toilets - sign	£28.97
Bk Tfr - Pro Dynamic Contracts - Goal Post Installation	£780.00
Bk Tfr - P. Reynolds - Phone box	£5.00
Bk Tfr - M. Wellington - Litter picker (June)	£204.00

APPENDIX B

2024/25 1st Quarter Finance Report	2024/25 Budget	2024/25 Actual
<u>OVERHEAD EXPENDITURE</u>		
Highways & Footways	£12,424.15	£2,607.80
Recreation Grounds	£22,160.00	£9,235.26
Cemetery	£8,900.00	£2,435.45
Public Toilets	£10,380.00	£2,412.06
Allotments	£1,700.00	£26.50
Miscellaneous	£1,050.00	£1,859.23
Administration	£32,027.92	£8,741.63
Donations & Grants made	£2,025.00	£350.00
Donations & Grants spent	£0.00	£911.52
	£90,667.07	£28,579.45
<u>INCOME</u>		
Income (Recreation Ground/Cemetery/Allotments)	£3,000.00	£1,591.98
Donations & Grants received	£3,200.00	£0.00
LIGHTING GRANT (SBC)	£2,780.00	£1,390.00
PRECEPT (SBC)	£90,000.00	£45,000.00
	£98,980.00	£47,981.98
Net Income less Expenditure	£8,312.93	£19,402.53
Plus transfer from earmarked reserves	£0.00	£0.00
Less transfer to earmarked reserves	£6,000.00	£6,000.00
Movement to/(from) General Reserves	£2,312.93	£19,402.53

APPENDIX C

Matters resolved under the Scheme of Delegation

Installation of two new goal posts at a cost of £650 + VAT, required to be completed before the ground becomes too hard. Approved by Chairman and Vice-Chairman.

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APPENDIX D

- A. New wetpour surface in toddler playground (following vandalism). Cost to replace wetpour £895 + VAT. An alternative is to claim off the council's insurance, which has a £250 excess.
 - B. To install a set of spare sockets at each end of pitch, enabling goal posts to be relocated in the off season so the goal mouths can rest/repair. Cost £400 + VAT.
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APPENDIX E

Boughton Parish Council recorded an emphatic and unanimous **objection** to the proposal. It should be pointed out that the site was previously rejected by Swale Borough Council (SBC) in its 2020 Strategic Housing Land Availability Assessment: 'It is difficult to see how the site could realistically be delivered given the issues and constraints that would need to be addressed' was their damning conclusion. A verdict which remains just as relevant today.

The Local Plan

According to National Planning Policy Framework (NPPF) paragraph 47, 'Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.' It goes without saying that development on this scale – a new settlement of over 5,000 people – should only come forward as part of the local plan process, not as a result of a speculative planning application.

Apart from bombarding residents with leaflets, and a one-off exhibition at the village hall, there has been no meaningful community consultation. Only 8 of the 14 people who bothered to provide feedback following that event 'generally supported' the proposed project – hardly a ringing endorsement.

The scheme is incompatible with the local plan settlement strategy. Policy ST 3 makes clear that

At locations in the open countryside, outside the built-up area boundaries... 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.

Boughton is a historic village, 'its setting and the valued habitats and landscapes around the village constrain its major expansion' in the words of 'Bearing Fruits'. As a rural service centre it has limited facilities; Dunkirk even fewer. The applicants would have us believe that the proposed development, which will result in a doubling of the existing population of the two villages combined, will 'help sustain' the existing communities. The reverse is true; they risk losing their character and identity, subsumed into a single conurbation.

Contrary to what is claimed, SBC can now demonstrate a five-year housing land supply hence the presumption in favour of development is not triggered. And, even in its absence, the 'tilted balance' does not apply in cases where, to quote paragraph 11d:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Both of these criteria are easily met here.

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Landscape

The site is within a designated Area of High Landscape Value (Kent Level) i.e. of county importance. NPPF paragraph 180 states that

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes... (in a manner commensurate with their statutory status or identified quality in the development plan)
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services

Local plan policy DM 24 confirms that ‘the value, character, amenity and tranquillity of the Borough’s landscapes will be protected [and] enhanced’ and that in Areas of High Landscape Value planning permission will only be granted ‘subject to the... 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 [the] harm.’

The landscape character of the Blean is summarised by SBC as follows: ‘The surrounding Farmland Character Zone is also of Kent importance because it enables the distinctive and unique core woodland landscapes to be experienced, not only from the woodland itself, but from the adjoining countryside.’ ‘Interim Review of Local Landscape Designations and Important Countryside Gaps’ (December 2014). cited in Draft LVIA, section 2.16. The applicants disingenuously refer to the site as ‘low grade land’ that is ‘unconstrained by designations that would materially impact its development potential’, wilfully ignoring the fact that it is the agricultural landscape by which it is foregrounded no less than the woodland itself that is of value.

Foresters Lodge Farm is a historic farmstead situated in a clearing in the Blean, something atypical in itself. (Due to its heavy clay soil the area was deemed unsuitable for cultivation, the reason much of it survives today.) The landscape is distinctive; an expanse of cornfields, interspersed with hedge lines of remnant mature oaks, the whole almost entirely encircled by woodland; it conveys an impression at once of openness and enclosure. The sense of tranquillity and remoteness belies the presence of the nearby A2, mercifully hidden in a cutting. As noted by landscape consultants LUC, ‘Much of the area is only accessible on foot with just two minor rural lanes (apart from the A2), with limited built development and consequently very dark skies at night.’ Swale Local Landscape Designations (2018).

According to NPPF paragraph 191

Planning policies and decisions should also ensure that new development is appropriate for its location taking into account ... the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should...

- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

A development of 1,815 dwellings extending to 76.5 ha and including buildings up to 5 storeys in height is hardly appropriate for such a location; it would result in the destruction of a large tract of open countryside. Its urbanising effects would be even more wide-ranging; the resulting sky glow is likely to be visible from miles around.

The site is traversed by a number of footpaths, including the Big Blean Walk – a national trail. NPPF paragraph 104 states that ‘Planning policies and decisions should protect and enhance public

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rights of way.’ The detrimental effect on recreational amenity is an important material consideration that weighs against the development. After all, who wants to walk through a housing estate?

The loss of productive agricultural land, albeit not in the best and most versatile category, is contrary to policy DM31.

Heritage

NPPF paragraph 206 states that ‘Any harm to, or loss of, the significance of a designated heritage asset (... from development within its setting), should require clear and convincing justification.’ The proposal will harm a number of heritage assets and their settings, not least the Dunkirk radar tower, a rare surviving example of a World War II Chain Home radar station and scheduled monument. According to policy DM 34, ‘Development will not be permitted which would adversely affect a Scheduled Monument, and/or its setting.’ The replacement of its existing rural backdrop with built development will diminish one’s experience of this historically important heritage asset, diluting its significance.

The settings of the listed Christ Church Dunkirk and the Old Vicarage will be detrimentally affected by virtue of their proximity to the 4,700 m² employment zone with its 20 m high industrial buildings, as well as the proposed new slip road. In addition, Foresters Cottages and the Barn, which stand to be completely engulfed by the development, have been nominated for inclusion in the local heritage list hence its effect on the significance of this group of buildings also needs to be taken into account as per NPPF paragraph 209.

It is imperative that a detailed archaeological evaluation is carried out prior to any decision.

Ancient Woodland

The site could hardly be more ecologically sensitive, being almost entirely surrounded by ancient woodland – in NPPF terms ‘irreplaceable habitat’ – much of it a local wildlife site and nature reserve. It is also part of a nature recovery area which is functionally linked to the Blean Complex, one of the largest remaining areas of ancient woodland in the UK, a habitat of both national and international importance. Unsurprisingly, the RSPB, Kent Wildlife Trust, the Woodland Trust, and Buglife have all roundly condemned the proposals. The following comments are representative: ‘We do not believe adequate mitigation will be possible for a site such as this, therefore planning should be refused’ (RSPB); ‘Development in this location is likely to significantly impact on areas of ancient woodland, ultimately resulting in deterioration of these irreplaceable habitats’ (Woodland Trust); ‘we cannot see how the integrity of the LWS and ancient woodland will be retained post development’ (Kent Wildlife Trust); ‘nationally important invertebrate populations could be adversely affected by these proposals’ (Buglife). The area is one of the last remaining strongholds of the critically endangered Heath Fritillary butterfly.

NPPF paragraph 186 provides that

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

- a) 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;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted
- (c) 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.

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Local plan Policy DM28 similarly sets out that

When the proposed development will have an adverse effect on the integrity of a European site, planning permission will only be granted in exceptional circumstances, where there are no less ecologically damaging alternatives, there are imperative reasons of overriding public interest and damage can be fully compensated.

And ‘within locally designated sites... development likely to have an adverse effect will be permitted only where the damage can be avoided or adequately mitigated or when its need outweighs the biodiversity interest of the site.’

The site itself contains a large number of trees, chiefly mature oaks, many of which are acknowledged to be ‘high-value’. There will be direct impacts to trees during the construction phase of the development, including damage by construction traffic, notably root compaction. The majority of the tree loss will be incurred as a result of the construction of the new road infrastructure, which effectively wipes out Jays Wood. This is objectionable in principle and will additionally result in the destruction of a large area of priority habitat. Of the trees that are being retained, the Arboricultural Impact Assessment concedes that a substantial number will suffer ‘significant encroachment’ into their root protection area (thereby endangering their long-term health and survival). This includes the site’s single veteran tree, a 400 year old oak, something which particularly disturbed the Woodland Trust. Almost all will be subjected to canopy reduction works. In other words, pruned to within an inch of their life to prevent them being ‘in the way’ of the proposed development. In the longer term, dangers posed by air pollution, changes in hydrology, and contaminated runoff are all likely to damage this irreplaceable habitat, especially the woodland edge – not helped by the paltry 20 m buffer the developers are proposing. The Woodland Trust recommends a buffer of at least 50 m.

The Sarre Penn has its source near Foresters Lodge Farm. The discharge of surface water from the development risks polluting this watercourse which goes on to flow through Blean Woods. Natural England in their response advise that this will affect Stodmarsh and that ‘nutrient neutrality’ is consequently required. The applicant’s consultants refute this claim, arguing that the Sarre Penn discharges further downstream at Grove Ferry. In point of fact it ‘discharge[s] into the tidal section of the River Stour which has a backwater effect in a westerly direction through Stodmarsh.’ This is according to Canterbury City Council’s ‘Draft Nutrient Mitigation Strategy’, October 2022.

Let’s not forget the Blean complex is also threatened by the aforementioned authority’s plans for a new ‘urban extension’ on land owned by the University of Kent. Treated effluent as well as surface runoff from that development (expected to have its own on-site sewage treatment works) will likewise drain into the Sarre Penn. It should be borne in mind that ‘treated’ effluent still has high levels of nitrogen and in particular phosphorous – responsible for eutrophication – as well as containing other potential ecotoxins e.g neonicotinoids from pet flea treatments. A circumstance which may be of concern to South East Water, since this self-same watercourse is to supply the new Broadoak reservoir.

Biodiversity

Apart from losing their habitat to the development, the wildlife will be at risk from recreational disturbance – humans and dogs – not to mention significant cat predation. This especially applies to ground-nesting birds e.g. skylark, nightingale and nightjar. Compared with some parts of Blean Woods, the area has hitherto remained relatively undisturbed. The development will make it more easily accessible not just to residents but to visitors from further afield leading to littering and the risk of fires, as well as increased levels of nitrogen and phosphorous from dog fouling,

As is their wont, the developer’s ecologists do their utmost to downplay the site’s importance for wildlife. ‘Given the current low ecological value of much of the site, it is anticipated that... the

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scheme would not have a major negative impact upon biodiversity,’ they lie. A conclusion which is at variance with some of their own findings. It is acknowledged that ‘The surrounding woodland is of district value to breeding birds, however the habitats within the site itself are considered to be of site / local value.’ 8 skylark territories were recorded during the ecological survey. No compensation is proposed for this loss of habitat.

The area is considered to be ‘of local value to dormice’. Given that ‘numerous dormouse nests as well as individual dormice were found on site during the survey period’, this sounds suspiciously like an understatement. Indeed Jays Wood had plentiful evidence of dormice, and reptiles – particularly slow worm – which will need to be translocated to a suitable receptor site (something which is rarely successful). In this context the assertion contained in the ecological impact assessment that ‘the proposals will deliver a significant betterment for biodiversity compared to the existing site baseline’ is frankly laughable. And they’re only offering 10% biodiversity net gain (BNG).

Indeed it would appear that the developers have already started as they mean to continue. Dunkirk Parish Council has a dossier of detailed photographic evidence of the site-trashing spree carried out in February 2023: major limbs of protected trees were severed, field margins cleared and ditches filled – doubtless with the object of skewing the BNG calculations i.e. post the initial survey (January 2021) but before the baseline habitat assessment undertaken by Lizard Ecology in June 2023. Naturally this is denied on the application form. In response to the question ‘Has there been any loss (or degradation) of on site habitats resulting from works carried out on before the date the on site pre-development biodiversity value was calculated?’ they have answered ‘no’. It is imperative, therefore, that the BNG metric is amended to reflect this fact.

Worse still, despite the known presence of dormice within the site boundary, and even with a map indicating the precise location of their nests, the applicants (or their agents) went and razed these very areas of hedgerow to the ground. The mangled remains of dormouse nesting tubes were discovered at the scene. This was clearly an offence under the Wildlife and Countryside Act 1981 and should not go unpunished.

Sustainability

Winterbourne Fields is intended to be a self-sustaining community with an employment zone providing 600 jobs, a care ‘village’, nursery, primary school, doctors surgery, retail and leisure facilities and more. It really does promise the earth. Most of these bold claims are entirely without substance. The doctor’s surgery alone is a complete non-starter; the numbers are simply not there.

One of the scheme’s more arresting proposals is the use of so-called Mobility hubs. (A ‘Primary Mobility Hub’ including a bus station, e-bike hire, car club rental facilities etc. plus an ‘array’ of 6 ‘Secondary Mobility Hubs’.) Mobility Hubs are relatively untried in the UK – a ‘developing concept’ as the applicants put it. The few that exist are predominantly located in urban areas, which already have good transport links, not out in the sticks. They are also costly to implement and maintain. The whole thing reads suspiciously like something copied and pasted from elsewhere. More to the point, it scarcely compensates for the fact that the location is inherently unsustainable to start with.

There are similarly ambitious plans for a 36-space EV charging hub. Much is made of the public benefits of this facility which includes_a café and toilets ‘for travellers on their way to the cross-channel ports in Dover and Folkestone’ (albeit it is somewhat inconveniently located off the London bound carriageway). National Highways (NH) complained that the plans were short on detail and questioned whether the hub ‘has been designed to accommodate manoeuvring and rest points for heavy goods vehicles’. They need not be overly concerned. Given that its operation would require the construction of a whole new electricity substation, it is unlikely to materialise any time in the foreseeable – if ever.

According to NPPF paragraph 109, ‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.’ Winterbourne Fields, we are told, is to be a ‘10-minute neighbourhood’ in which ‘walking and cycling are the primary modes of travel’. But who is going to walk, wheel or cycle when they’re effectively marooned on the other side of the A2? At least pending the construction of the proposed footbridge.

It is stated that ‘Faversham and Canterbury are within a reasonable cycle distance of the Site.’ This is debatable. The most direct routes to Faversham and Canterbury offer neither pleasant nor safe cycling, involving busy roads such as Brenley Corner/Graveney Road or alongside the A2, and include the vertiginous Boughton Hill. Nor is it realistic to expect people to cycle to Selling Station, which has no secure cycle parking.

The Transport Assessment (TA) insists that for any ‘trips external of the Site, bus travel will be promoted as the sustainable alternative to the private car.’ Currently there is just one bus an hour to Faversham and Canterbury serving the villages (with limited services in the evenings). The applicant’s long term aim is to have shuttle buses running every 7-10 minutes – ‘an ambitious level of service for a rural area’ noted Active Travel England, with some understatement. In view of the current state of the county’s bus services, it seems little more than a pipe dream. Stagecoach would not deign to venture any further into the site beyond the ‘bus hub’ on the southern side. And what of those going to Canterbury? Presumably they would have to walk to the existing bus stop in Dunkirk...

As for the nearest train station, walking to Selling along footpaths or unlit country lanes without pavements is hardly a practical or safe option and in any case would take well over an hour.

In short, whatever the applicants would have us believe, all the evidence points to this being a car-dependent development. The site’s main attraction, which they dare not openly admit, is its location immediately adjacent to a major transport route.

Highway Safety

The proposed scheme easily meets the very high threshold set by NPPF paragraph 115 whereby development should be refused on transport grounds, namely that ‘there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.’ Arguably Winterbourne Fields ticks both of these boxes.

The A2 Boughton Bypass is already an accident black spot. Over the past 5 years, the TA reports, there have been a total of 44 collisions on this stretch of road including 4 fatalities, 35 at Brenley Corner roundabout, a circumstance it attributes to the sheer volume of traffic only to conclude, somewhat contrarily, that ‘the impact of the proposed development on the safety of the road is likely to be insignificant’.

The TA acknowledges that ‘the A2 Boughton Bypass is operating above theoretical capacity’ and that the proposal is likely to have ‘an adverse impact on the operation of Brenley Corner.’ (Whilst the latter ‘may’ be upgraded in the fulness of time, that won’t improve the situation as regards the former; indeed it is likely to get worse since any upgrade of the junction will inevitably unleash a tidal wave of industrial estate development in the vicinity.

It is suggested that ‘the proposed Site will generate a total of 1,006 two-way vehicle trips in the AM peak hour and 1,058 two-way trips in the PM peak hour...based on a worst case scenario’. (Given that the second week of the ATC survey was conducted during the 2021 fuel supply crisis, their figures may not be entirely reliable.)

NH has questioned whether the trips generated by the development itself – viz. the employment site, primary school and in particular the EV charging hub – have been factored in to the traffic modelling for the replacement A2 junctions. The applicants claim that this latter would merely attract through traffic but, as they point out, vehicles would still have to exit and rejoin the A2. Seeing as the facility will be able to charge 85+ vehicles per hour, it may well attract a large clientele.

The TA admits that the development ‘is expected to have an adverse impact on junction capacity’ at Rough Common/Palmars Cross, Brenley Corner and the A2/A251 Ashford Road. The effects are inevitably going to spill over into the area’s rural lanes. As a result of congestion at Junction 7, much of the development traffic will resort to using the Staple Street Road and Courtenay Road. The latter also risks being used as a shortcut by those travelling towards Whitstable and Thanet.

A major flaw in the applicant’s traffic modelling flagged up by NH is the fact that it makes no allowances for the phasing: ‘Only providing one assessment year carries the risk that development traffic will cause adverse impacts on the SRN before the additional infrastructure is in place,’ they caution.

In this connection, it is concerning that the necessary highway infrastructure is due to be delivered at a comparatively late stage of the build-out: thus the junction serving the southern portion of the site is not scheduled for construction until after the first 800-odd dwellings have been completed, while the slip road that links to the eastbound carriageway will be delayed until the final phase.

In the interim, vehicles heading to or from Faversham will have to travel through the villages, adding to the existing traffic misery for residents – especially if it includes construction traffic. Whilst this is meant to be diverted to Upper Harbledown (non-HGV) and Bishopsbourne (HGV) – a detour of some 20 miles in the latter case – it is more than likely that any vehicles under the prescribed 7.5 t weight limit and particularly contractors vans will be tempted to use The Street.

A ‘temporary’ access to the development is to be created via the existing access to Foresters Lodge Farm (‘temporary’ in this case being something of a misnomer since it is likely to be in place for at least 10 years.) Even with the introduction of signal control, the increased use of this junction could pose a risk to highway safety. At peak times it might lead to traffic backing up on the A2 slip road. In addition, NH expressed doubts as to whether the modifications needed to achieve the requisite visibility levels were in fact practicable due to the ‘significant tree cover and steep terrain’ of the roadside embankment.

The cost of the new junctions is likely to run into billions of pounds. Whether it is even remotely viable is a moot point. One fears the game plan is to build the first 3 phases and then call it quits. Suspiciously the applicants are keen to point out that their modelling shows that the ‘temporary’ access could easily cope with all the development traffic whilst at the same time insisting that ‘This is a scenario that will never happen.’ SBC, were it minded to approve the application, should take all necessary steps to prevent such an eventuality.

Air Pollution

The increased traffic and congestion resulting from the development will adversely impact air quality in Boughton, especially in conjunction with the other developments planned for the M2/A2 corridor both by SBC and notably CCC. Approx. 38,000 vehicles per day travel along the A2 Boughton Bypass, including 3500 HGVs (SBC, Transport Strategy 2022-2037 (2021)).

Although no monitoring is being carried out, from data gleaned from addresspollution.org it is evident that pollution levels at addresses close to the Boughton Bypass are not a million miles off those recorded in the Newington AQMA.

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mcg/m ³	12 Poplar View	Gay Cottage, Gas La	Newington AQMA	WHO limit
NO ₂	19.95	17.4	22.6	10
PM2.5	9.75	9.76	11.8	5
PM10	16.75	16.84	17.1	15

According to NH's 'Route Strategy Initial Overview Report: Kent Corridors to M25' (May 2023), Boughton is one of four areas in the entire county most at risk from traffic-related air pollution:

In terms of air quality, there are receptors within 100 metres of the strategic road network which may be more likely to experience adverse air quality impacts: and therefore most likely affected by poor air quality... [including] the A2 west of Canterbury at Boughton under Blean.

It pledges to 'where possible...reduce air quality and noise impacts on communities served by the route.' It follows that siting large-scale developments adjacent to the A2, thereby generating even more traffic and exposing even greater numbers of people to this hazard, is incompatible with this aim. (It's worth noting that the parts of the development closest to the bypass are assigned to what is deemed 'sensitive receptors' i.e. a primary school, playing field and care home.)

Water & Wastewater

East Kent is an acutely water stressed area. A development of this scale, set to increase the population by upwards of 5,000, is likely to have a significant impact on water resources. Dunkirk, as is well known, experienced a prolonged loss of supply in summer 2022. South East Water advise that there is insufficient capacity within the existing network to accommodate the proposed development hence 'offsite reinforcements' will be required. The situation is already critical. As recently as January the company was served notice by the Drinking Water Inspectorate due to excess nitrates in the drinking water supplied by its Boughton Water Treatment Works, which caters for a number of the surrounding villages. It is now only working at half capacity. The problem is likely to worsen rather than improve due to the effect of the historic use of artificial fertiliser (the so-called 'nitrate time bomb'), the application of sewage sludge as well as private drainage systems, not forgetting sewage 'spills' and misconnections.

The development, we are told, will generate more than 7.25 million litres wastewater per day. Southern Water's 'desktop study indicates that these additional flows may lead to an increased risk of foul flooding from the sewer network.' According to the Foul Drainage Strategy, a new sewer is to be laid linking the development to the Faversham Wastewater Treatment Works (WwTW) via a series of pumping stations. However the Environment Agency is under the impression that the foul drainage will be discharged to the mains sewer network at London Road, Dunkirk. On the application form, the stated plan is to connect to the existing drainage system. This needs to be clarified.

Faversham's WwTW was declared to be working 'at capacity' as far back as 2010 – well before the building boom of recent years got under way. Freedom of information requests to Southern Water confirm that, following privatisation, nothing has been done to increase capacity and furthermore that there are no plans to do so.

The villages' wastewater infrastructure is already creaking at the seams, resulting in regular 'spills'. Data obtained from the company reveals that the Boughton pumping station at Stockers Hill released raw sewage on more than 30 occasions last year, 5 of which were of more than 30 hours duration – that's 327 hours in total – directly into the White Drain, one of the most polluted rivers in Kent.

Conclusion

It is hard to imagine a more unsustainable development than Winterbourne Fields. Building a new town plumb in the middle of ancient woodland, adjacent to a nature reserve, represents an entirely inappropriate use of land. Its environmental impact would be devastating and serious question marks hang over the viability of the infrastructure required to underpin it. Boughton under Blean Parish Council would strongly urge Swale Borough Council to reject the application.

APPENDIX F

CLERKS REPORT 06-06-24 to 02-07-24

(Summary of tasks completed)

Public Amenities

1. Routine inspection of public toilets, cemetery, allotments and recreation grounds
2. Attended site meeting for football pitch maintenance works
3. Reviewed completed contractor work for goalpost installation
4. Reviewed completed contractor work for football pitch repairs
5. Works instructed for toddler playground repairs (before vandalism)
6. Addressed vandalism of padlock and access issues at Poplar View
7. Quotes requested for tree maintenance at Bull Lane recreation ground and Poplar View
8. New sign for public toilets ordered and received
9. Completed digital scan of all burial ground documentation
10. Attended site meeting with locksmith for changes to public toilets building
11. Attended site meeting to install new stopcock for allotments
12. Liaised with police regarding vandalism of toddler playground surface

General

13. Kept website up to date with meeting agendas and minutes, road closures, news items
14. Kept facebook page up to date with meetings, road closures and news items
15. Carried out monthly defibrillator check
16. AGAR for 2023/24 submitted
17. Various water leaks in the parish reported
18. Attended SCRIBE accounting software demonstration
19. Attended SLCC regional Clerk's Conference
20. Filed VAT refund for Q1 2024/25

(Summary of tasks in progress)

1. GMA training for football pitch management
2. Draft risk assessments for individual purposes (recreation grounds, cemetery, toilets etc)
3. Obtaining quotes for cemetery bench repairs
4. Review of new financial regulations
5. Photo catalogue Garden of Remembrance (cemetery) plots
6. Obtaining quotes for weed clearance on path at Bull Lane

(Summary of tasks to be done)

1. Review all outstanding EROB renewals on cemetery plots
2. Obtain quotes for allotment strimming
3. Update HIP
4. Arranging educational visit to Miyawaki project
5. Gordon Ottaway Award 2024
6. Obtain quotes for tarmac repairs at Bull Lane
7. Obtain quotes for wall repairs at Bull Lane
8. Renew contracts for quarterly playground/gym inspections
9. Upgrade website to be WCAG compliant

Chairman's Initial.....