

Tabled Update for Item 2.1 – 22/503654/EIOUT – Land west of Bobbing

Corrections to officer report

Delete paragraph 9.4.

Regulation 19 Local Plan Consultation

At the Full Council meeting of 1 April 2026 Members considered growth options for strategic and non-strategic housing contributions. Members resolved that Growth Option 4 as the growth strategy for the drafting of the Regulation 19 Local Plan consultation be agreed. Growth option 4 is as follows:

	Growth Option	Strategic contribution (potential dwellings)	Potential strategic site options	Residual required from non-strategic sites
4	Strategic sites in east and west of Borough/settlement hierarchy hybrid	5,000	23/505533 South East Faversham (2,500 dwellings) 22/503654 Land to the west of Bobbing (2,500 dwellings)	3,068

The Draft Regulation 19 Local Plan will be the subject of consultation from Monday 10th August until Monday 21st September, subject to agreement by Full Council on 22nd July. In view of the current stage of progress with the emerging Local Plan it is considered that the identification of Growth Option 4 as the growth strategy for the draft Regulation 19 Local Plan be afforded negligible weight in the planning balance such that it does not alter the planning balance as set out in the original Officer's report.

Further Representations

Two additional objections have been received from local residents which address issues previously summarised within the 26th March 2026 committee report and tabled update. Additional comments to those that have been referenced elsewhere are summarised as follows:

- Planning Committee Chair should ask the Committee members for a show of hands to indicate how many of have read the 557 documents associated with this application.
- Retail uses are not required given local provision and closure of shops in Sittingbourne.
- Community centre is not required as Bobbing Village Hall is sufficient.

Transport/Highways

A letter has been received from Charles and Associates (C&A) highways consultants on behalf of Quinn Estates Ltd which is summarised as follows:

- KCC Highways state they are satisfied the Swale Highway Model (SHM) is an appropriate tool with which to assess of the wider highways network impacts of the proposal, including traffic reassignment. They advise that a proportionate assessment is appropriate with a focus on links and junctions where material impacts are likely to arise. Wider highways impacts are identified as diffuse in nature and not giving rise to operational or safety concerns that would materially affect the performance of the network. The assessment should use the SHM to determine where and to what extent the wider network is impacted, and these wider impacts should inform the scope of the assessment.
- KCC's assessment is not sufficiently evidence based therefore the conclusions reached on highways impacts are not justified – if KCC have seen evidence to support their position it is unclear why this has not been made available. *Officer note: the highways modelling data has now been submitted by the applicant and made publicly available.*
- Reference to views expressed by National Highways' is not relevant where the KCC Highways Network is concerned.
- Officer's report suggests that the Highsted Park applications adopted a wider geographic scope for the highways assessment due to their scale - this is incorrect as the scope was determined by forecasting in the SHM across the entire modelled area and refinement of scope based on evidence of impacted areas - the same approach should be adopted for the Bobbing proposal. *Officer note: C&A are referring to a summary of the applicant's response on highways matters and not a point made by officers. The respective highway authorities are satisfied with the modelling undertaken.*
- The Highsted Park scheme comprised two separate planning applications with one being significantly smaller than the Bobbing proposal at 1,250 homes, yet the same wider geographic scope was required for both highways assessments.
- Officer's report suggests that the Highsted Park application involved updated highways modelling without updates to the ES, but amendments were made to relevant ES chapters as necessary. *Officer note: as above, this relates to the applicant's response.*
- Highsted Park and SE Faversham were not the subject of appeals as is suggested in the Officer's report. Highsted Park was called-in for determination by the Secretary of State and supplementary highways modelling was undertaken; however, the more robust and thus worst-case model scenarios in the ES did not require updating. Supplementary modelling has not been provided to correct the cumulative impact assessment under the Bobbing application, and the comparison

is potentially misleading. *Officer note: as above, this relates to the applicant's response. It is the case that the applications at the referenced sites have not been the subject of appeals.*

KCC Highways have provided a further response to the letter, noting that the points set out largely reiterate previously expressed concerns regarding the scope of the assessment, the treatment of wider network impacts, and the availability of modelling information, which have been previously addressed in detail. Accordingly, the response reiterates comments from KCC Highways previously summarised within the committee report update, and these are not repeated here. The additional points made in response are summarised as follows:

- The suggestion that the scope of the assessment has been predetermined or not informed by the modelling is not supported by the evidence. The strategic modelling has been used to inform the selection of locations for detailed assessment, reflecting standard Transport Assessment methodology.
- It is suggested that KCC's conclusions regarding wider network impacts are unsupported and based on assumption rather than evidence. This is not the case as the conclusions reached by KCC are informed by the outputs of the strategic modelling, including the SHM, together with detailed technical review of the results and their implications for network performance. The role of the highway authority is to interpret that evidence using professional judgement in line with established guidance, including determining whether impacts are material in operational or safety terms. The characterisation of wider changes as "diffuse" is therefore not an assumption, but a reflection of the pattern of modelled flows, whereby relatively small changes are distributed across a wide network and do not materially affect the operation of individual links or junctions. This form of interpretation is standard practice in transport assessment and is necessary to apply the relevant policy tests.
- The comparison drawn with the Highsted Park application does not alter the above conclusions. In all cases, the appropriate approach is to ensure that the scope of assessment is proportionate and informed by evidence, and that impacts are tested where material. KCC is satisfied that this has been achieved in this instance.
- The latest objection does not introduce any new technical evidence that would alter the previously established position of the highway authorities. The transport assessment has been subject to detailed and ongoing scrutiny, and KCC remains satisfied that the development would not result in severe residual cumulative impacts on the highway network, in accordance with national policy.