

Alexander Gunyon

From: Erin Steward [REDACTED]
Sent: 02 June 2024 20:59
To: Consultations
Subject: Objection to policy W3 and 4, Brocklands Farm, Whitstable.

Categories: Blue category

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Dear sirs,

Further to my objections below, I am in disbelief that this development could even be considered.

There are already four development sites within this area, two by Kwik Fit, Whitstable Heights, and a huge development on the Old Thanet way. The infrastructure is already dangerously bad, there are not the facilities within Whitstable to support this huge increase in population. The traffic would implode the already 'potholed', limited access routes, that struggle already with the volume of traffic. The flooding risk, the sewage - where will that go - into our already polluted sea? A sea that unnecessarily receives far more sewage output that is legal. Yet the water companies will not admit liability. The children will not have a place at a senior school, as all the senior schools are full already. Let alone the nature aspect. The destruction of a very ancient bio diverse system. This would be lost forever. As it stands in Whitstable it is difficult to get a dentist or Dr appointment, how will the health system cope with this increase in population? The two hospitals - that are quite some, difficult, distance are already at bursting point. Finally, where will these people go to work? There simply is not enough of an economic requirement for this volume of additional persons.

I object.

Regards,

Erin Steward

Re: Consultation for Canterbury District Local Plan to 2040

I strongly object to policies W3 and W4 (Brooklands Farm) of the draft Local Plan to 2040 for the following reasons:

1. **Loss of an Area of High Landscape Value** with wonderful rural views of the distant Blean. CCC's Landscape Character Assessment 2020 recommended that CCC should reinforce the open rural setting south of Whitstable and resist development in the A299 New Thanet Way corridor.
2. **This is not a sustainable place to build a large development**, from which (if its like the rest of south Chestfield) more people would be commuting to Canterbury than any other destination, almost all of them by car. It will also contribute to traffic congestion in the north Canterbury area.
3. **Increased flood risk** downstream on the Swalecliffe Brook. At present heavy rain sits on the farmland before it slowly evaporates or trickles into the Brook. Vast areas of storage would be

required to accommodate rainwater run-off from any urban development, but this could not be located close to the Brook because that area already floods when the river level rises over the riverbanks as happened in February.

4. **Lack of health facilities.** Local residents now find they can't secure an appointment with a local GP, and if they need hospital treatment their three-day stay in Margate's hospital is in the hospital corridor due to lack of beds.

5. The local **sewage works cannot cope** with the increasing demand, and regularly releases untreated sewage into the sea, causing instances of serious illness for people on local beaches. The new outfall under construction will not solve this problem.

6. The proposed new junction linking the A299 to Chestfield Rd and South Street would create **huge increases in traffic, and therefore road safety problems, pollution and noise** in residential areas.

7. **Bad for our wildlife.** Seriously negative impact on Biodiversity. There is a lot of insect life associated with the cattle of Brooklands Farm, and consequently there are swallows, house martins, wagtails, numerous bats and no doubt much more that is less easy to see. There is also wildlife on the arable fields, e.g. skylarks

8. Adverse effect on the **Local Wildlife Site** at Convicts Wood. Building 1,400 houses nearby would cause it to be severely degraded and used as a children's recreation area and dog-walking route. Residents would use the area for dumping garden waste, as already happens in comparable areas along the Swalecliffe Brook. Residents' cats would kill off the local wildlife.

9. **Loss of "Best and most versatile"** agricultural land.

10. **CCC needs to recognise that housing developments affect the coastal towns much more severely than Canterbury.** Canterbury can expand to north, east, south and west. Whitstable can only expand southwards, as it is constrained by marshland to the west, and by Herne Bay to the east. What little farmland that remains within easy walking distance of Whitstable is needed for residents' recreation and well-being as well as to preserve the last vestiges of the natural setting of this tourist destination town. Therefore, the farmland between the Blean woodland and the existing urban edge of Whitstable should be given statutory protection.

11. For the reasons listed above, the proposals would be unsustainable and would contravene paragraphs 135c, 168, 173, 180a, 180b, 180d and 191b of the Government's National Planning Policy Framework.

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Dear Sirs,

I object to the Blean development proposal as of this date 2nd June 2024.

My objections are -

1. Too much traffic. It already takes 45 minutes to get to Canterbury from Whitstable - on a good day, to get children to senior school. There is only one senior school near.

2. Education. You will rediculously eradicate a significantly historical school, for a large primary. My children went to this school. Where will the senior school children go? There is not currently enough space in the grammar system, yet you promise this. Children are already missing out on this option. All of the other senior schools are full too. This has not been thought out. It has been thought to the minute, not too the future.

The roads are already limited, poor quality, too small, constantly being shut, for repairs on gas, electrical, etc services. there are no other alternative routes that are reliable, big enough, not potholed or being used for other greedy developers.

3. Health, there are not enough doctors, dentists, medical facilities. You shut the Canterbury hospital down to minimum services, the Margate and Ashford hospitals are packed already and how a very poor record for service. yet you wish to add at least 4000 into this pot of not being able to provide. The roads to either of these hospitals are treacherous, small and slow. No good in an emergency.

4. Environmental. The Blean is a scared, historical site of huge interest. Historically it holds still the clues to many more undiscovered facts to our local history. The nature is significant, the Blean has rare species - known only to these woodlands and the trees themselves are ancient and therefore protected. This site should be treated with respect and be cared for. Not keep being eaten into by greed and money. The Blean used to reach all the way to Whitstable and now, due to lazy planners, greedy councils it will no longer be available for future generations to enjoy. Learn and grow with. You are closing all of the wildlife corridors. How will our precious wildlife continue to exist if we keep on destroying what it needs. It is a mutual need us for them and them for us.

Do we want to end up like the destroyed rainforests?

5. Flooding and waste management - where will all the poo go? Into our sea at Whitstable - already the water companies are pumping illegal waste into our sea. And where will all the surface water go? There is n large river, no though has gone into this impact. the destruction of other housing areas not equipped to deal with flooding as they were built so long ago.

I believe this development will be detrimental to the whole area. Those of us in Whitstable, the surrounding villages and Canterbury. We do not have the infastructure to cope with this volume. The facilities - roads, health, education and environment are already stretched and all need support first and foremost.

To confirm. I object to this development of the Blean, Canterbury.

Regards.

Erin Steward

Many people are questioning the thinking behind a development twice the size of the central, walled part of Canterbury, on a greenfield site that would in-fill between three distinct villages: Tyler Hill, Blean and Rough Common.

Local planning papers and housing strategy tell us why this proposed development is unsuitable and unworkable.

Significant negative impacts

The inclusion of this site in the Local Plan comes as a surprise, as previous assessments have found it unsuitable for housing development for a large number of reasons. The most recent Strategic Land Availability Assessment from December 2023 notes there would be: "Significant negative effects on Biodiversity, Geology, Landscape, Water, Historic environment (site contains a Scheduled Ancient Monument and is adjacent to Grade 2* and Grade 2 Listed Buildings, with likely impacts on the heritage assets and/or their setting) and Land use (site is a greenfield over 3ha)."

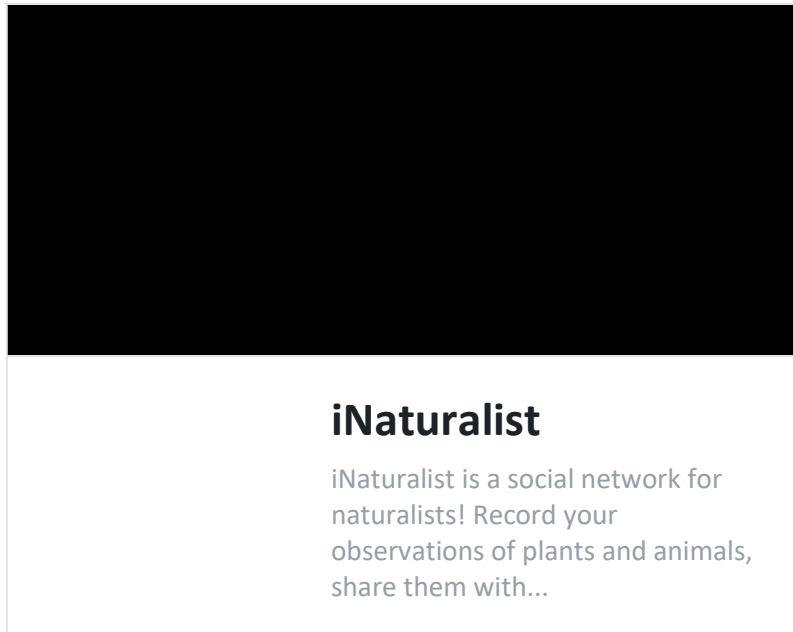
Impossibly demanding deliverability targets

The latest Strategic Land Availability Assessment goes on to say: "While the SA has identified significant and minor negative impacts, it is determined, when reviewed alongside the SLAA on the balance of impacts and considering possible mitigation and design, that the majority of these impacts can be addressed."

However, the *possible mitigations* are so demanding and unlikely that they cannot be achieved:

- The site is within the Green Gap and would lead to settlement coalescence. Due to the size of the site, character of the area including projection into the open countryside, isolated location separate from the urban area/settlement, and existing views, development would have a significant adverse impact on the surrounding open countryside.
- There are significant heritage sites and conservation areas all around the proposed area for development, protected by national planning laws.
- The site is a greenfield area of more than 100 hectares, and is Grade 3 agricultural land currently used for arable crops and grazing.
- This would be a large-scale car-dependent development (even with additional buses planned). Tyler Hill Road is narrow, and the junction between Tyler Hill Road and Blean Common has had several incidents meaning more traffic could cause significant negative impacts on the highway network.
- The previous Local Plan to 2045 included a Western bypass as a proposed way to expand local road capacity, as the Council recognises that local roads in North Canterbury are already at their limits. The Western bypass has now been removed from the local plan, with no alternative suggestion for how 2,000 additional households with cars could get around the city.
- Loss of such a large, well-used and significant open space cannot be adequately "reprovided" within the site – it is a huge local asset and amenity, which no amount of mitigation or substitution can replace.
- Flood risk is given a positive assessment in the latest SLAA – a big point of concern as we believe the SLAA is wrong. The majority of the site is London Clay (as noted in the [Landscape Character Assessment and Biodiversity Appraisal 2020](#)) so not free-draining and liable to flooding. A huge amount of mitigation would be needed to make the site viable for thousands of houses, paved gardens and tarmac roads. Planning advisors say it may be virtually impossible to mitigate against surface flooding. Councils across the UK are increasingly facing flash-flooding compensation claims from residents and businesses for poor flood planning.

- The SLAA notes there are still “Uncertainties” regarding biodiversity: “no biodiversity evidence but within an orange area for Great Crested Newts.” There is in fact significant biodiversity evidence, with multiple protected species being sighted, studied and mapped on national data sets such as the [National Biodiversity Network Atlas](#) and [iNaturalist](#).



- There is also a note re Uncertainties around practical timings between the loss and “reprovision” of Blean Primary School. The local communities are deeply concerned that a primary school rated Outstanding by Ofsted could be closed for a long period and/or massively disrupted.

Impact on the whole Canterbury District

The proposed housing development north of the University would swell the current population – around 3,700 across the three villages – to an estimated 10,000. All the associated pressures on traffic, GPs, hospitals, waste management and water supply would follow.

The Stodmarsh Issue – where Natural England has had to call for a pause to house-building to stop irreversible damage to the Stodmarsh River and National Nature Reserve, caused by nitrates from non-organic farming and human sewage – is also still a major concern and needs to be managed at the District level.

Population projections

The National Housing Strategy to build 300,000 houses a year plays into this new proposal, with the Council facing the challenge that new houses need to be built *somewhere* in the district otherwise Canterbury will miss its targets.

However, the number of houses that need to be built in each area are based on figures produced by the Office for National Statistics (ONS). The Alliance of Canterbury Residents’ Associations (ACRA) has concerns around the district’s failure to use the latest population projections, and has urged the Council to plead Canterbury’s case for exceptional circumstances due to a falling population in the district.

A report commissioned by Canterbury City Council in 2021 shows that the rate of growth forecast by the ONS is no longer realistic. The Edge Analytics report predicts population growth of 8% between 2023 and 2040 – half the rate forecast by the ONS.

Under the new National Planning Policy Framework, the Council can make the case to Central Government that Canterbury has “exceptional circumstances” and therefore should have its local housing targets adjusted – we strongly urge them to do so.

