

## Alexander Gunyon

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**From:** annie [REDACTED]  
**Sent:** 02 June 2024 12:43  
**To:** Consultations  
**Cc:** Alex Ricketts  
**Subject:** Objection to Policy C12 University of Kent development of the draft Local Plan to 2040

**Categories:** Blue category

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Annie Taylor  
[REDACTED]

### **Objection to Chapter 2 (Canterbury), Policy C12 University of Kent development of the draft Local Plan to 2040**

This is an additional comment to my earlier one regarding Policy W3 and W4 (Brooklands Farm) which I have discussed with Alex Ricketts.

### **Objection to Policy W3 and W4 (land at Brooklands Farm) of the draft Local Plan to 2040**

This letter is to state my objections to the above proposed development.

The Blean Woods are ancient woodland, and there are specific areas within this development that have clearly been identified as ancient woodland. These are green field rural areas, not brown field, and the size and scale of the proposed development will have a detrimental effect on the entire area. Protecting the Sarre Penn stream and its valley is very important, however, Site C12 contradicts policy SS1 (10): "The council will continue to work with partners to... support the extension and improved connectivity of the Blean Woodland Complex." This development would cut across the Blean Woodland Complex making connectivity impossible.

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.

Living downstream in Whitstable where we already have huge flooding risk and current nonstop battle with sewage, the increased development without infrastructure will cause additional problems, of the scale of Stodmarsh, 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.

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. Cannot the empty buildings within Canterbury, all around the Cathedral (specifically the Debenhams buildings) be converted into flats for example? There is a huge amount of empty properties above even the occupied shops. Surely it would be more appropriate to use what already exists?

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.

The transport issue is a big one. Current road traffic is heavy, and such development will only increase it. The buses are currently cut in service and unreliable. Policy C12 does not comply with SS4 (1.49), which says: “focusing growth at the urban areas, and at Canterbury in particular, presents the greatest opportunities to plan for a switch to sustainable transport.” Site C12 is called a “rural settlement”, is outside the urban envelope of the city, and is described as a “large-scale car-dependent development” in the SLAA.

It has also been pointed out that the adopted Local Plan 2017, policy EMP7, requires that significant development proposals at the University be subject to updating of the University's Transport Impact Assessment and a review of the University Travel Plan. Neither of these has been produced in relation to site C12. Walking and cycling may well be prioritised, but with this amount of development most properties will own at least one car. Site C12 has many issues due to the number of cars it would add to the unsuitable local road network. The council says this can all be solved by the Bus-First Strategy and everyone switching from cars to buses, however it is not easy to get people out of their cars - especially if they consider they are moving 'out of town'.

C12 does not satisfy policy DS19 of the Local Plan, as C12 would create one continuous urban sprawl between Rough Common, Blean and Tyler Hill with no real separation of three distinct villages. The open space and landscape buffers shown are not sufficient to mitigate the impact on the villages,

Finally, Biodiversity Recovery. This policy says “Improving biodiversity across the district is a clear priority of this plan” but in the same breath says “Although the district benefits from the **biodiversity hotspots including The Blean**, the Kent Downs, The River Great Stour and the coast, biodiversity across these sites and neighbouring countryside and urban areas **continues to decline.**” The Blean is identified in the Local Plan DS21 as a biodiversity hotspot; is an identified 'Biodiversity Opportunity Area' BoA in the Kent Wildlife Strategy; and is a priority Area of Particular Importance for Biodiversity in the Local Nature Recovery Strategy. Site C12 contradicts all of these policies.

Apologies if this objection is not very clear. I have found the process extremely difficult and have relied on the information I can find as well as my own observations.

Signed  
Annie L Taylor



## Alexander Gunyon

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**From:** annie [REDACTED]  
**Sent:** 02 June 2024 11:39  
**To:** Consultations  
**Subject:** Objection to Policy W3 and 4 (land at Brooklands Farm) of the draft Local Plan to 2040

**Categories:** Blue category

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Annie Taylor

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### **Objection to Policy W3 and W4 (land at Brooklands Farm) of the draft Local Plan to 2040**

I am writing to express my strong objection to the proposed housing development on Brooklands Farm.

Brooklands Farm is a precious green field site, in a rural area with irreplaceable good quality agricultural land offering a vital sanctuary for wildlife and contributing to the overall ecological balance, air quality and floodwater control of our community. 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.

1. The scale of development in this area is unsustainable. It lacks the infrastructure. Dr Ribchester of the Whitstable Medical Practice has expressed specific concerns about how the current medical facility is expected to care for that many more families, when they are already at capacity for this area.
- 2) The site lies outside of the town boundary on good quality agricultural land and will result in the unacceptable loss of open green space. It is Rural, not Urban, and should remain as such.
- 3) There would be a deterioration of irreplaceable habitats including ancient hedgerows and the Swalecliffe Brook. The significant impact the development would have on the local wildlife and their natural habitats is of grave concern. Birds of prey, sparrow hawks & buzzards etc, use the hedgerows for hunting. An abundance of birds use the hedgerows for nesting. We have regular sightings of woodpeckers, greenfinches, wagtails, goldfinches, and all the usual wild birds. There are many slow worms on the site and hazel dormice.  
The destruction of this green space would result in the loss of biodiversity and disrupt the delicate ecosystem that currently thrives in the area. Preserving such natural habitats is essential for maintaining a sustainable environment and ensuring the well-being of future generations.

#### 4) Flooding.

Brooklands Farm's green fields currently act as natural drainage, absorbing excess rainwater during heavy rainfall and reducing the likelihood of severe flooding. The replacement of these fields with impermeable surfaces such as buildings and roads would disrupt the natural drainage system and potentially exacerbate flooding issues, placing both existing and future residents at risk. The fields are London clay which is highly susceptible to volumetric changes depending upon its moisture content. During exceptionally dry periods or where the moisture is extracted by tree root activity, the clay can become desiccated and shrink in volume, and conversely swell again when the moisture content is restored. This can lead to many problems near the ground surface, including structural movement and fracturing of buildings, fractured sewers and service pipes/ducts and uneven and damaged road surfaces and pavings. Such damage is recognised to be covered by the interpretation of subsidence in buildings insurance policies, and the periods of dry weather in 1976/77 and 1988/92, in particular, led to a host of insurance claims. As a result, many insurance companies have now increased the cost of premiums for buildings located in the most susceptible areas where damage occurred, where the clay is close to the surface.

#### 5) Sewage.

Brooklands Farm is situated in an area that already faces challenges with flooding & sewage. The increased strain on the existing system due to the additional housing could lead to overflows, pollution of water sources (the Swalecliffe Brook also), and a decline in water quality.

Southern Water is unable to cope with the present pressure it is under, let alone supplying an additional 1400 houses.

1400 more houses with one or two toilets will add to its already overstretched capacity.

The Swalecliffe Brook flows through the Thanet Coast Site of Special Scientific Interest (SSSI) before joining the north Kent coast to the east of Whitstable, a section of the coast which forms part of the Saxon Shore Way. It runs through Brooklands Farm.

It could have been classed as a Salmonid River (trout stream) due to having brown trout and eel, both of which are of conservation significance. There is also the possibility that three-spined sticklebacks will still be present, despite the 2013 sewage dump that polluted the brook at Long rock. There was a horrific dump again last weekend. The situation is already one of a constant battle and nothing is being put in place to change the already broken system.

#### 7) Traffic.

Our roads in this area are narrow and are unable to cope with the amount of extra traffic that will be created by 3000 plus extra cars, not to mention the pollution and noise. The planned new junctions for the A299 would be dispensing traffic onto roads that are ill equipped to deal with it. The additional traffic then going through to Chestfield, South Street and Canterbury will create a significant impact on not only the roads and residents in the area, but going to Canterbury, the road goes through ancient woodland, and pollution and noise etc will have a detrimental impact on wildlife.

It is essential to thoroughly evaluate and address these concerns to avoid any negative consequences for both residents and the environment.

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.

In conclusion, I strongly urge you to reconsider the proposed housing development on Brooklands Farm. The preservation of this green field site, the mitigation of sewage issues, the protection of wildlife and

their habitats, and the prevention of flooding should be of utmost importance. It is crucial to explore alternative options that prioritise sustainable development and do not compromise the well-being of our community and environment. In addition, 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.

Thank you for considering these concerns and taking the appropriate action.

Signed  
Annie L Taylor

