



Dear Sir/Madam,

Re: Canterbury City Council Draft Local Plan.Site policy W4 chapter 3 Land at Brooklands Farm

I think there are some good ambitions in the new draft local plan, found in its sustainability appraisal, to protect bio diversity, conserve the landscapes of the district for people and wildlife, to avoid inappropriate development in areas at risk of flooding , to avoid the unnecessary loss of best and most versatile agricultural land, to avoid adverse impacts to bathing waters, support the reduction in the need to travel and so on, none of which are fulfilled by the proposed development at W4 Brooklands Farmland, Whitstable with your own chart showing the most negative impact on the land at Brooklands Farm (W4) see below.



Table 5-12 - Summary SA of proposed housing allocations – Whitstable area

SLAA Site Ref:	Site Address:	Proposed allocation reference	SAO 1: Air Quality	SAO 3: Biodiversity	SAO 4: Geology	SAO 5: Landscape	SAO 6: Water	SAO 7: Flood risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
2017 LP	Whitstable Harbour	W2	0	--	--	+	--	--	-	+/?	++	++/- -/?	++	++/- /?
SLAA141	Oyster Indoor Bowling Centre and Whitstable Harbour Garage (Identified as part of Whitstable Harbour broad location for development)	W2	0	--	--	+	0	--	0	+	+	++/-	++	++/- -
SLAA104	Brooklands Farm, Whitstable	W4	0	--	--	--	--	--	--	++	--	++/?	++/- -	++/- -

I write to strongly object to the proposed development at Brooklands Farm, Site/ policy W4, chapter 3 for the following reasons:

1. Loss of best and most versatile agricultural land

The National Planning Policy Framework requires that local planning authorities should use areas of poorer quality land in preference to that of a higher quality, and if agricultural land is to be proposed for development the economic and other benefits of that land should be taken into account. The housing evidence base which supports the draft local plan does not address this requirement.

The land is currently farmed for cereal crops and is therefore likely that it is Grade 3a rather than 3b, Grade 3A is best and most versatile agricultural land and its development for housing would be contrary to policy EMP 12 of the current local plan and policy DS12 of the draft local plan. Given that shortages of wheat and other cereal crops that have been highlighted by our dependence on imports from the war in Ukraine, surely agriculture land should be protected for the growing of crops rather than being concreted over /destroyed and used for development. We need our own food security in this country. The government have just highlighted the importance to protect food security by not using agricultural land for solar farms, surely permanently building on this land must be contrary to this policy . Once lost, our farmland and countryside are lost forever.

2. Development outside urban area

The land at Brooklands Farm is outside the settlement boundary of Whitstable and it has not been adequately demonstrated that its development is necessary to meet local needs. The central south and western end of Whitstable has made substantial contributions in previous local plans in taking on new commuter residents working in Canterbury or in London without the appropriate investment needed in infrastructure of many and possibly all types. Sites W4, may be being put forward to generate S106 contributions for new slips on the New Thanet Way at Radfall designed to relieve pressure on the old Thanet Way.

3. Landscape Impact

The 2017 Canterbury Local Plan shows Brooklands Farm within an “**area of high landscape value**” (see page 10 of the 2017 Plan). The Canterbury Landscape Character and Bio diversity Appraisal dated as recently as October 2020 designates this site as being within LCA 10 Chestfield wooded farmland. It is in an area of high biodiversity value with rare butterflies and breeding birds, golden plover, nightingales, and the Brook (of Brooklands Farm) and it’s banks are home to water voles, stickleback and newts as well as a plethora of other wildlife.

It provides a wide panoramic view of the valley of the Swalecliffe Brook with the forested Blean hills in the distance. Footpath CW27 crosses the site and is popular with local residents for rural dog-walking and simply enjoying the countryside and its wildlife. The A299 Thanet Way is not visible, being screened by trees and landscape.

A major part of the attractiveness of the view over the green valley of the Swalecliffe Brook is its rural tranquillity.

The development would totally change the nature of the valley and just being able to see the Blean over the rooftops wouldn’t be the same.

Those considerations, along with landscape and biodiversity impacts in the short and long term, should be requiring all of the gap between the existing building line of Whitstable/Chestfield and the edge of Blean Woods and Radfall settlement be proposed as Green Gap and should not be included in the draft local plan as a strategic site for a development of estates.

It is noted that when the A299 was approved by ccc in the 1990’s an agreement was made by the council that the area between the old Thanet way and the new Thanet Way (A299) would not be allowed to be infilled with housing development . The 2020 appraisal furthermore notes :- Strong rural character pervades despite proximity to the urban area and route of the A299. A crisp well defined urban edge abuts well managed agricultural farmland providing a rural farmed setting to the adjacent coastal settlement. All of this would be lost by these proposals.

Limited consideration is given to these impacts within the evidence base.

The ecological biodiversity and landscape value would be adversely impacted by a development on this site.

4. Flood risk

The evidence base states that the site is within Flood Zones 2 & 3. This is incorrect the site is within Flood Zone 3. There is therefore a high probability of flooding which will be exacerbated by climate change. It is long established that the Swalecliffe Brook and its (tidal) tributaries cause flooding in Chestfield and parts of Swalecliffe with high tides and heavy rainfall. Having grown up in a house overlooking this landscape I can confirm that the Fields turn into an extensive lake when the Brook overflows.

Greater rainfall intensity (climate change) is already causing historically novel flooding issues in and around Whitstable.

5. Environment/sewage effluent.

In combination with other housing developments (including those already under construction), the planned housing would add to the sewage effluent pollution problem on the beach at Swalecliffe. Southern Water’s sewage works appear to be unable to safely process Whitstable’s sewage after heavy rainfall, particularly if they use the Short Sea Outfall. The effect on people’s health is not known because there is no reporting system for beach users who become infected. Southern Water’s plans for replacing the Short Sea Outfall are unclear, but it appears the replacement “longer ‘ pipe currently being installed will only result in pumping effluent further out which will then be brought in with the tide.

6. Traffic impacts.

The proposed off-slip from the A299 onto Chestfield Road would lead to extensive through traffic using Chestfield Road and South Street, particularly on summer weekends (when Long Reach roundabout queues can stretch back onto the A299) and weekday evenings. This through-traffic is likely to include heavy vehicles. The summer weekend traffic has not been modelled and the effects are unquantified. There doesn't seem to be any modelling for school run traffic that would be exacerbated by a development of this scale with a potential 3000 + cars on the housing estate using local roads . There will be increased traffic, air and noise pollution, as well as light pollution. CCC proposal to use buses and encourage walking and cycling are unrealistic in this location , being surrounded by steep hills. With an ageing population and anyone with mobility impairments (myself included) would not be able to travel in this way . This scheme seems a utopian dream completely unrelated to the location and how people live there lives.

In Conclusion

1. The proposed development at Brooklands will result in the loss of best and most versatile and important agricultural land.
2. There will be a negative affect on the countryside from the encroaching suburbanising impact on the countryside. This car dependant urban sprawl would merge Whitstable into Chestfield which presently has its own distinct identity. This seems to contradict the government directive to protect the character of local communities. There will be increased traffic, noise, light and air pollution destroying the rural nature of this setting.
- 3.The site allocation, if adopted, will create additional sewage effluent pollution at Swalecliffe beach.
4. I would support the recommendation made by Whitstable Society that the whole of the W4 Brooklands Farm site be defined as Green Gap.
5. There is a total lack of proposed (or existing) infrastructure to support the scheme , public transport, roads, already overwhelmed sewage and water, inadequate school provision & medical facilities which are already full to capacity in this area as highlighted by Dr Ribchester at the public consultation meeting in Whitstable , which others will have dealt with more knowledgeably and more fully than I have here.
6. Given the government current U turn on housing quotas and its directive to protect green spaces, and agricultural land for food security , actively look for brown fill sites and bring back into use unused housing stock this local plan seems to be now out of date in proposing a scheme which delivers far more units than are required for the predicted local population increase. (especially if this is sold to a London Borough Council thus not meeting the needs of local residents)

The rural nature and agricultural value of Site W4 Brooklands Farm should be being preserved for amenity use and mental well-being of future generations and preserved vitally for our long term food security It should be taken into account the long term danger/ impact of concreting over this green space (the green lungs of the area (and threat to it's bio diversity and wildlife) and the increased flood risk, when the land cannot absorb rainfall and additional run off from this vast tarred and concrete area , given the huge impact that global warming & the climate emergency is having on our lives and land.

I strongly object to including Brooklands Farm. Chapter 3 policy W4 in the (identified in this draft). local plan.

Yours faithfully,

Wendy J Croft

