

## Alexander Gunyon

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**From:** Catherine Day [REDACTED]  
**Sent:** 03 June 2024 16:59  
**To:** Consultations  
**Subject:** Comments on Local Plan - Policy C12 Land at UKC and Policy W4 Brooklands Whitstable

**Categories:** Green category

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### --Email From External Account--

Dear Sirs

I am writing to object to the following inclusions in the local plan as follows

Firstly I would like to point out that the University's financial problems are not a legal planning objective that the council should have any regard to when making their decision.

I find it unpalatable at best that the same land agents for the University are those that advised the Council on their own office redevelopment (I do however support this brown field site which is in a much better location)

## Blean

### 1. Loss of Irreplaceable Habitats - which can NEVER be mitigated

- Ancient woodlands are unique ecosystems that have developed over centuries. When new houses are constructed on these woodlands, they will be lost forever.
- The direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by damaging or destroying them, including the biodiverse soils, ground flora, fungi, roots, and understorey vegetation.
- The destruction of these woodlands will lead to habitat fragmentation and huge biodiversity loss.

### 2. Impact on Biodiversity:

- Ancient woodlands support a rich diversity of plant and animal species. Construction disrupts these ecosystems, affecting wildlife habitats.
- LPAs cannot avoid or mitigate for negative impacts on protected species and ancient woodlands therefore going against Natural England.
- Under the Wildlife and Countryside Act, 1981, and Conservation of Habitats and Species Regulations 2017: Skylarks are protected under this act. It is an offence to kill or injure, damage or destroy their breeding sites and resting places. It is also an offence to disturb them intentionally or recklessly.

- Natural Environment and Rural Communities Act (2006): All native birds, including skylarks and nightingales, are listed as rare and most threatened species under Section 41 of this act.

### 3. **Fragmentation and Isolation:**

- New housing developments can fragment ancient woodlands, isolating smaller patches. This disrupts ecological connectivity and reduces genetic diversity.

### 4. **Climate Impact:**

- Ancient woodlands sequester carbon and contribute to climate regulation. Clearing them for housing & building houses will release stored carbon and increase CO2 impacting UK climate targets.

### 5. **Water Management:**

- Ancient woodlands play a role in regulating water flow, preventing flooding, and maintaining soil stability. Urbanization will alter these processes.
- Urban development alters natural water flow patterns. Paved surfaces increase runoff, leading to flooding and soil erosion.

Flooding is a serious issue in the area due to the London Clay

### 6. **Visual and Cultural Heritage:**

- Ancient woodlands have cultural and historical significance and have heritage laws. Their loss impacts local communities and the landscape.
- Ancient Woodland Inventory (AWI): The government acknowledged in Parliament that the AWI is a crucial tool for protecting trees and woods from harm. The Keepers of Time Policy outlines the value of England's ancient and native woodlands and ancient and veteran trees. It states Government's commitment to evaluate the threats facing these habitats and sets out England's updated principles and objectives to protect and improve these habitats for future generations.
- Principles and Objectives: The policy sets out updated principles and objectives to protect and improve these habitats for future generations. This includes increasing the extent of native woodland, improving the ecological condition of ancient woodland and ancient and veteran trees, conserving the rare, threatened or priority species that rely on ancient woodland, reducing the pressures on ancient woodland, and valuing ancient woodland and ancient and veteran trees. The policy also recognises the importance of cultural importance to health and wellbeing.

### 7. **Traffic and Air Pollution**

- Increase in 2000 homes, 2000-4000 cars on the road, 2000-8000 people living in the area increasing waste and the significant impacts that has on pollution. Infrastructure Strain:

- New houses require infrastructure which will strain existing systems.

8. The school - it is unprecedented for a thriving school to be knocked down and pupils to have to move during construction. What impact assessments have been carried out?

Farmland - as the situation in Russia and Ukraine shows us we need food security for our future. Developing large swathes of high grade agricultural land is unethical for the general population.

## **BROOKLANDS**

The conversion of farmland to housing development will have several significant impacts:

**Increase in Air, Water, Noise, and Landfill Pollution:** Construction activities + 1400 homes will generate pollutants such as dust, noise, and chemicals. These harm air quality, contaminate water sources, and disrupt ecosystems.

**Natural Resources Loss:** Converting farmland to housing reduces available land for agriculture and wildlife habitats, leading to biodiversity loss.

**Population Fragmentation and Biodiversity Loss:** Urban development fragments natural habitats, affecting wildlife movement and biodiversity. The conversion of farmland to housing can lead to habitat loss and fragmentation, threatening local and regional biodiversity.

This land at Brooklands has native protective species including the slow worm. Under the Wildlife and Countryside Act, 1981, and Conservation of Habitats and Species Regulations 2017. Under the Natural Environment and Rural Communities Act (2006) all native reptiles, including slow worms, are listed as rare and most threatened species under Section 41 of this act.

Urban structures act as barriers to animal movement. This will prevent animals from accessing food, mates, and other resources. Also disrupt the life cycles of many species and lead to local extinctions.

**Waste Generation:** Construction generates substantial waste, including materials like concrete, wood, and plastics.

**Climate Change:** Contribute to greenhouse gas emissions, impacting the global climate. Farmland sequesters carbon, so its loss will contribute to climate change.

**Risk of Flooding:** Building on farmland will increase flood risk, especially as this land is in a functional floodplain.

**Food Security:** The loss of productive farmland will threaten food security. The increased risk of severe flooding caused by climate change will further challenge food security in the future. More than 200,000 hectares – or 60% – of England’s finest Grade 1 agricultural land is within areas at the highest risk of flooding.

The problem with all these plans is they conflict with the overall vision of the plan which is for healthy communities and environment. The loss of these areas will impact the local communities in terms of access to green space and nature which we have all come to understand over the last few years.

There is also not enough information about traffic at this stage for a proper response, but most of the roads affected are country lanes which are eminently unsuitable for the volume of traffic that would be generated. It is a very impractical solution to expect these developments to rely on public transport.

Yours sincerely

Catherine Day

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