

Alexander Gunyon

From: Michelle Saunders [REDACTED]
Sent: 03 June 2024 16:35
To: Consultations
Subject: Re Objection to Consultation for Canterbury District Local Plan to 2040

Categories: Green category

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Dear Sirs/Madam,

I strongly object to policies W3 and W4 (Brooklands Farm) of the draft Local Plan to 2040.

I am writing to express my strong objections to the proposed housing development on Brooklands Farm and other sections within the Draft Local Plan to 2040 for Whitstable & Herne Bay areas proposed by Canterbury City Council. 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 of our community. Having recently returned to live in the area after 30 years away, I am acutely aware of how much development & loss of green landscape has occurred during that time period and the consequences across the board of this & in particular to the local residents (including my recently deceased mother who had lived in what was once called South Tankerton since 1966). The considerable increase in traffic, noise & light pollution in the area from development over that time is very apparent meaning sadly the open spaces, great views, privacy and peace & quiet once enjoyed living here is greatly reduced or non-existent. The time scale for the draft plan sees further development in only 15 years. Although I do appreciate the need for additional housing, in the last 3 years alone Whitstable, Herne Bay & the surrounding area have seen multiple large housing developments completed & others being started including Whitstable Heights, Pearson Heights, Grasmere Gardens & Montpelier Avenue in Whitstable. Greenwood Gardens; St Augustine's Place; Thornden Wood Village, Oxenden Park, Wentworth Park, Bluebell Gardens in Herne Bay & over since 10,000 homes in 7 developments closer to Canterbury itself. For one development in Whitstable I am still receiving adverts through the door which makes me believe they are not selling despite the significant incentives being offered. The underlying infrastructure, particularly in relation to health, social care, education, traffic, transport, ecology & utility provision is sadly lacking, with little or no provision to improve this before increasing the population drastically with the new developments planned. In addition the permanent loss of vast areas of green landscape & agricultural land across the area, at a time when the importance of having & maintaining these has been highlighted by the recent global Covid pandemic. This seems to be negligent & makes me fear absolutely no lessons have been learned by those we elect and trust to govern our country, both nationally & locally, nor is the bigger picture being considered.

Due to health issues I have been unable to view the draft plan fully. As a result my position is non-limited to, but my objections specifically apply to policies W3 & W4 for the reasons I have specified below.

1. Unsustainable overdevelopment of the area. The current infrastructure in place is already struggling under the current population; further significant increases will only exacerbate these problems.
2. In addition to the other housing developments planned, currently under construction & recently completed the addition of the proposed development of Brooklands Farm alone will hugely increase noise, road safety problems, traffic, pollution, delays and disturbances for local residents and those travelling into Canterbury, both during development and long term on completion.
3. Proposed developments during construction & on completion would see significantly increased traffic on the local roads (many of which are narrow) feeding many thousands of additional vehicles (hundreds of which would be heavy goods/construction vehicles) & journeys onto locally narrow roads daily that are already struggling with the volume of traffic. Current road surfaces are also unable to sustain the volumes of traffic experienced now & already cause damage to vehicles using them.
4. Access arrangements to Brooklands Farm site are unlikely to operate safely & reliably over the many future decades required. This inevitable failure could lead to hazardous "rat-running" along unsuitable surrounding roads and/or catastrophic health and safety events & insufficient access for emergency vehicles.
5. On completion the planned new junctions for the A299 linking it to Chestfield Road & South Street would be dispensing traffic onto roads that are ill-equipped to deal with it. The location of Brooklands Farm is not a sustainable place to build a large development, from which 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. Whitstable is not the right place to build houses for Canterbury commuters!
6. 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. CCC don't know how bad these increases will be because the Local Plan traffic modelling was totally inadequate.

7. Increased risks of flooding & water drainage problems which is already a considerable problem in the area and downstream in Chestfield and Swalecliffe with much of it consisting of London Clay. 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 further overflows, pollution of water sources (also the Swalecliffe Brook), and a decline in water quality. At present heavy rainfall sits on the green fields at Brooklands Farm before it slowly evaporates or trickles into the Swalecliffe Brook, reducing the likelihood of severe flooding. 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. There are historical incidents of existing waterways breaching their banks & flooding surrounding areas & properties particularly at these times of heavy rainfall. In my lifetime I have seen a rowing boat crossing flood water on the higher elevated area of the proposed Brookland Farm development by Rayham Road & Lismore Road junction. Government policy as set out in Sections 100–103 of the Government’s National Planning Policy Framework is to avoid development of areas at risk of flooding including any development which could increase the risk of flooding to surrounding areas. 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. As previously stated 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.
8. Increased demand for water on a system already struggling to provide the current population. An example of this being the local hosepipe bans during the summer of 2022 & 2023.
9. Increase in levels of sewage. This is already an issue in the area for Southern Water with the current structures in place unable to cope with the current volume it receives. Increasing outfall from a minimum 1400 additional homes at Brooklands Farm; each with one or two toilets, and other commercial buildings will only add to this already overstretched capacity.
10. Increase of raw sewage regularly being pumped into the sea locally. The frequency of this occurring is already a major issue due to failing infrastructure & would only increase with further increase in waste volume. In addition to the health & environmental impact, this could seriously affect the towns tourism. People will not visit the area to swim or to eat the oysters & other fish delicacies from contaminated waters & there are already instances of people becoming seriously ill as a result of visiting local beaches. Whitstable is globally famous for its native oysters & its tourism industry is largely based on this.
11. Health & social care provisions are insufficient for the current population of the area. Lengthy waits for even routine healthcare appointments are now the norm & many can’t even secure an appointment with a local GP. This is due in part to insufficient GP & hospital facilities in the area. Struggling to easily fill prescriptions due to insufficient pharmacies in the area & minimal open outside of normal working hours, even if only by an hour is so until 19.00-20.00 hours. KCC already contributes below the national average for residential care placements for the elderly, physically & mentally disabled in the area. Sadly I can cite dozens of examples detailing failings across the local health & social care system from first hand experience & also those of neighbours & friends, including those needing life saving hospital treatment in Margate hospital receiving it in the hospital corridor due to lack of beds. Elderly people waiting in excess of 15hours to receive urgent out of hour doctor visits; only then to be told to call an ambulance instead. Ambulance wait times at an all time highs. Sadly the situation is already catastrophically worse than before the pandemic & changing the goal posts(eg ambulance attendance to patients experiencing heart attacks being changed from category 1 priority to category 2 is not a solution. Although I appreciate the latter is outside CCCs control; vastly increasing the local population isn’t and will only exacerbate this unacceptable situation further.
12. The proposed Brooklands Farm development of such a huge site of 1400 hundred residential properties & further business/industrial properties will create a large suburban sprawl which is totally out of character with the surrounding area.
13. The proposed Brooklands Farm development will result in the loss of an Area of High Landscape Value with wonderful rural views of the distant Blean.
14. The proposed Brooklands Farm development will result in the permanent destruction of the rural nature of the valley of the Swalecliffe Brook, which provides the unofficial Green Belt between urban Whitstable and The 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.
15. The proposed Brooklands Farm development will be bad for our wildlife & habitats having a seriously negative impact on genuine 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. The destruction of this green space would result in the loss of the 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.
16. 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. Bats are seen regularly across the fields, as is the albino squirrel. 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.
17. The proposed Brooklands Farm development will cause an 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.

18. 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.
19. The proposed Brookland Farm development will result in loss of "Best and most versatile" agricultural land. 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.
20. 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.
21. CCC needs to recognise that housing developments affect the coastal towns much more severely than Canterbury. Where 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.
22. For the reasons already listed, 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.

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

In conclusion, I strongly urge you to reconsider the proposed housing development on Brooklands Farm & others on land to the south of Whitstable. 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.

I should like to take this opportunity to thank you in advance for considering my concerns and taking the appropriate action.

Yours faithfully

Michelle H Saunders

Mrs M H Saunders

[Redacted signature]

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