

## Alexander Gunyon

---

**From:** Emily Firmin [REDACTED]  
**Sent:** 03 June 2024 16:13  
**To:** Consultations  
**Subject:** Objections to Brooklands Farm Development chapter 3. Policy W4  
**Categories:** Green category

You don't often get email from [REDACTED] [Learn why this is important](#)

### --Email From External Account--

From. Emily Joan Firmin  
**To:** [consultations@canterbury.gov.uk](mailto:consultations@canterbury.gov.uk) <[consultations@canterbury.gov.uk](mailto:consultations@canterbury.gov.uk)>  
**Sent:** Monday 3 June 2024 at 13:27:35 BST  
**Subject:** Objection to the Brooklands Farm Development policy:W4

I am writing to register my strong objection to the proposed housing development on Brooklands Farm. Policy W4

First and foremost, 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.

Everyday we are reminded that we live in a politically dangerous and unpredictable time. We need Farmland now more than ever. The government has expressed a reluctance to build on farmland itself.

1) The scale of development in this area is unsustainable. It lacks the infrastructure. I received a letter from my GP who is retiring, stating that due to Estuary View being full to capacity, I will have to attend Chestfield medical practise. A GP announced at the Whitstable consultation that you would need 35 more GP's to cope with the amount of new people. It will directly affect waiting time. Potentially people could die as a result.

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.

The 2020 Landscape character and biodiversity appraisal states in its guidance:

### Landscape Guidelines and Key Habitat

■ Continue to actively manage the agricultural land as productive arable and pasture farmland so that it forms a managed agricultural landscape on the edge of Whitstable, avoiding field fragmentation and creation of paddocks. Seek opportunities for management of arable fields for biodiversity including retaining

uncultivated margins.

Limit further expansion of development on the south facing slopes

which extend away from the coastal towns and form part of the rural setting of The Blean.

■ Avoid further infilling/backland development along the A290 Canterbury Road. Maintain single line of houses and avoid development which would create the impression of a more continuous urban edge extending between Whitstable and Canterbury.

The W4 proposal directly contradicts the appraisals guidance.

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. Bats are seen regularly across the fields. An abundance of birds use the hedgerows for nesting. We have regular sightings of Hen harriers, Kites, woodpeckers, greenfinches, wagtails, goldfinches, and all the usual wild birds. There are many slow worms and glow 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.

Convicts wood is going to sit in the middle of the 1,400 house development. There is no way that it won't have a detrimental affect on this ancient woodland with it's historical brook.

According to the Environment Agency it should be classed as a Salmonid River (trout stream) due to having spawning 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.

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 1,400 houses.

1,400 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.

7) Traffic.

Our roads in this 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.

#### 8. The Swalecliffe Brook stream.

. Environment strategy SSI

According to the information from the Environment agency, the Swalecliffe stream will not survive building on this site. The London clay will build up in the stream suffocating the Trout and eel. Concrete will block the natural aquifers filling the stream. Which surely would mean the developers would be committing an environmental crime. Also the run off from the roads will most definitely pollute the Swalecliffe Brook. Meaning Canterbury City Council would be committing an Environment crime.

#### 11. The Salt Road. (Crab and winkle cycle path.

This is a famously known cycle track, the historic rail route from whitstable to Canterbury. Should be kept as a valued walking and cycling path, with no other vehicles allowed on it. No development should surround this path

In conclusion, I contest the idea that we still need developments of this size, which alter the character and rural landscape of the town radically and forever. The statistics are based on a 2014 appraisal which is 10 years out of date.

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.

Thank you for considering these concerns and hopefully taking the appropriate  
Emily Joan Firmin.

## Alexander Gunyon

---

**From:** Emily Firmin [REDACTED]  
**Sent:** 03 June 2024 16:00  
**To:** Consultations  
**Subject:** Objections to the Blean Development 2000 houses

**Categories:** Green category

You don't often get email from [REDACTED] [Learn why this is important](#)

### --Email From External Account--

Dear Sir/ Madam. I am Emily Firmin and object to the building development of the Blean. Policy C12

I am objecting wholeheartedly to the policy C12 which proposes building 2,000 houses at Blean. The sheer number of houses is completely unsustainable and will have a direct effect on the following:

1. Traffic.

The two main access points for traffic are both on Whitstable Road, near the Rough Common roundabout. Rough Common Road would require “highways improvements” and two new slip roads on the A2 at Harbledown to be built – meaning Rough Common would be a major route into Canterbury. This would cause more traffic coming into Canterbury down Whitstable Road to St Dunstan’s roundabout and down St Stephen’s Hill, creating more congestion and affecting air quality.

All of the other surrounding roads are narrow, winding/hilly roads with records of speeding and accidents.

2. The Council’s 2021 Landscape Character Assessment describes the “strong rural character” of this area with its mix of woodlands, orchards and farmland, and talks about the need to conserve this landscape. The southern part of the site is located in Canterbury’s Area of High Landscape Value, and it is between two Sites of Special Scientific Interest – RSPB Blean and West Blean Reserve. The C12 proposals are incompatible with the 2021 Land Character Assessment, to which the Local Plan is required to conform.

3. The size of this development will cause the historic villages of Tyler Hill and Blean to merge together and lose their sense of community and identity.

The proposal would have impacts on many “heritage assets” including the Church of St Cosmus and St Damian as well as its setting, the remains of a Roman Villa and some Mediaeval Tile Kilns (both scheduled monuments), multiple Listed Buildings and multiple Conservation Areas.

The council’s Environmental Strategy set out in the Local Plan says “the district’s heritage assets are highly sensitive to change and the council is committed to protecting and, where possible, enhancing the historic environment for future”.

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, landscape or adjacent listed buildings, particularly Blean Church and Church Cottage.

4. The development site is right in the middle of the Blean Woods area, surrounded by various parts of the National Nature Reserve. There are numerous rare and endangered species living in the fields, ponds, hedgerows and Sarre Penn valley. The Council’s other policies (eg SS1.10) say that it will continue to work with partners to extend and improve connectivity of the Blean Woodland Complex, but this development would making connectivity impossible.

This development does not conform to policy SS1.10. It will most. definately have a huge negative impact on the biodiversity of the area.

5. The proposed development would mean the loss of large areas of “best and most versatile” Grade 2 and Grade 3 agricultural land, all at a time of political uncertainty. We need to hang on to our farmland .

6. The interruption to Blean primary school will be significant.

7. 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.

8. 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.

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.

9. 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.

10. Environment strategy SSI

According to the information from the Environment agency, the Sarre Penn stream will not survive building on this site. The London clay will build up in the stream suffocating the Trout and eel. Concrete will block the natural aquifers filling the stream. Also the run off from the roads will most definitely pollute the Sarre Penn.

11. The Salt Road. (Crab and winkle cycle path.

This is a famously known cycle track, the historic rail route from whitstable to Canterbury. Should be kept as a valued walking and cycling path, with no other vehicles allowed on it. No development should surround this path

I don't believe there is still the need for these oversized developments based on 2014 statistics.

I hope you will reconsider this proposal.

Emily Firmin. [REDACTED]