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OBJECTION TO PROPOSED HOUSING DEVELOPMENT ON BROOKLANDS FARMLAND

Please take my opposition to the proposal to develop the Brooklands Farm site by creating approximately 1,400 homes on farmland into consideration. I object to the proposal for the reasons below.

THERE IS AN ALREADY UNSUSTAINABLE SCALE OF DEVELOPMENT IN THE AREA

Brooklands Farm is high grade prime agricultural land in an ear of high landscape value. And yet, within a 2-mile radius from Brooklands, there is already an unsustainable amount of overdevelopment happening right now:

- a. approximately 450 new homes 'Whitstable Heights' under construction on fields,
- b. approximately 300 new homes 'Grasmere Gardens' under construction,

Unlike Whitstable town, the South Street and Chestfield areas, where the proposed development is located, is characterised by fields, hedgerows and woodland. It is rural in terms of the low density of housing, the culture and the natural landscape. These neighbourhoods are separated from Whitstable town by the 'Old Thanet Way'. They are entirely different in nature from the town of Whitstable and should be classed as rural/agricultural in the council's plan in order to protect the wildlife and provide open spaces for all those moving into this fast-developing (wider) area.

These areas are naturally divided from each other by unmade roads such as Rayham Road, Shepherd's Walk and Grasmere Road, agricultural land, fields, streams and woodland (some of it ancient woodland). The proposed development would merge the two neighbourhoods into one sprawl of housing and industrial landscape. The development of this area is already overbearing – it is a cumulative development along the whole of the Thanet Way encompassing Herne Bay, Greenhill and surrounding villages such as Sturry. The outskirts of all three of those places have been overdeveloped recently. There is a lack of evidence about whether the sales of the homes in the recent developments are serving the local population. I only know people who have moved into them from outside the county.

INSUFFICIENT EVIDENCE FOR DEVELOPMENT OUTSIDE URBAN AREA

The land at Brooklands Farm is outside of the settlement boundary of Whitstable and it has not been adequately demonstrated that its development is necessary to meet local needs.

It is clear that Whitstable has become a victim of its own success. The Brooklands Farm area has already been changed by housing developments that have been 'popping up' due to Whitstable becoming a fashionable tourist destination and desirable location for investment and second homeowners. These are the people buying homes in the Golden Hill site next to the Whitstable Tesco, the Olympia Way site opposite the Whitstable Tesco. The majority of the newly built houses in the area do not provide homes for local youngsters and local young families. The developers are 'selling the dream' of a second home by the sea to wealthy people from out of the area. It isn't about local needs. With the stunning beaches of 'Whitstable' on the advertising, more profits can be reaped.

LOSS OF HIGH GRADE PRIME AGRICULTURAL LAND

This land is some of the best and most versatile land in the district. Parts of it are farmed for cereal crops and are likely to be characterised as Grade 3a (not Grade 3b). Developing such land is contrary to policy EMP 23 of the current local plan and policy DS12 of the draft local plan.

The National Planning Policy framework requires that local planning authorities should seek to use areas of poorer quality land in preference to that of 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.

IMPACT ON LANDSCAPE

The High Landscape Value of the area in which Brooklands Farm sits is shown on Map page 10 of the 2017 Canterbury Local Plan. The landscape has not changed since then.

The area currently does not have a problem with light pollution, air pollution, anti-social behaviour, or litter. These will be some of the inevitable impacts should this development be allowed to proceed.

IMPACT ON WILDLIFE

Brooklands Farm is a precious green field site offering vital sanctuary for wildlife and contributing to the overall ecological balance of the community. The development of this site would result in the loss of biodiversity and disrupt the delicate ecosystem that currently thrives there. Preserving such natural habitats is essential for maintaining a sustainable environment and ensuring the wellbeing of our future generations. There is insufficient evidence that such development would not cause a deterioration of irreplaceable habitats including ancient woodland. There is concern that the significantly damaging impact on the local wildlife including protected species such as Great Crested Newts, Skylarks, and Bats.

The Swalecliffe Brook flows through the Thanet 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 has been classed as a Salmonid River (trout stream) due to having Brown Trout and Eel, both of which are of conservational significance. There is also the possibility that Three-spined Sticklebacks will still be present.

The inevitable effect of the Brooklands proposal will be loss of natural habitats and precious wildlife, light pollution, air pollution, litter, addition of approximately 3000 cars into the area (at least two per household, more if there are adult children living at home), significant reduction in the fields in this area.

LACK OF CONSISTENCY WITH CLIMATE EMERGENCY DECLARED BY THE COUNCIL

The proposed development of 1,400 homes on farmland will destroy natural habitats, reduce air quality, increase light and noise pollution and therefore breach the Council's own policies and strategies relating to climate change, maintaining and increasing natural spaces and protecting wildlife, increasing biodiversity. The responses to the Council's previous consultations show that this is not what the local community wants. The local community wants sustainable solutions and a sustainable future in the face of the Climate Emergency that the Council has itself declared. Why keep a proposal for what will effectively be a new small town in the middle of farmland? It would be more suitable to create smaller developments that will not throw a local area into such chaos.

IMPACT ON PHYSICAL AND MENTAL WELLBEING

A lack of open spaces and increased noise and air pollution due to increased traffic has an impact on residents – existing and proposed.

LACK OF INFRASTRUCTURE

There has already been a massive increase in traffic in this area with the existing overdevelopment. Recently, roadworks on the old and new sections of the Thanet Way have shown how one set of roadworks can bring this whole area to a complete standstill. It's total gridlock in the mornings. We have to leave at 7am to get to work and school on time. It is so hard to get into and out of Whitstable – the amount of traffic caused by those commuting to work and schools is hard enough. But you want to see it when the holidaymakers start their weekly pilgrimages to Whitstable. Queuing traffic causes air pollution and a reduction in air quality contributing to the increase in childhood asthma.

The increase in the demand for water supply in the area means that we have an annual hosepipe ban. This is a 'water stressed' area where abstraction is normally more than 20% of effective rainfall.

Higher demand on local health services will be inevitable if such development proceeds. Doctors, dentists, hospitals and health centres are already under pressure with the expanded current population. North East Kent have some of worse healthcare outcomes in the country. An additional 1,400 homes in this area would take that to breaking point. Currently my family members wait up to two weeks, and that's just for a telephone appointment. The Estuary View Medical centre is excellent but people from as far away as Maidstone and Ashford are already been advised to use the centre for out of hours care. The service normally provides the local people who use it the opportunity to see a nurse. Actually getting an appointment with a doctor either at my local surgery or Estuary View is almost impossible.

Hospital waiting lists at the local hospitals in Canterbury, Margate and Ashford are unacceptable already. It's the same situation when an ambulance needs to be called. The overdevelopment in Thanet in very recent years has exacerbated this problem further. A 12 hour wait in A&E is just routine.

Imagine adding another 3,000 people to this situation.

THE RISK TO DIMINUTION OF ANY RECEIVING WATERCOURSE AND WATER FLOW TO THE SEA HASN'T BEEN ADEQUATELY CONSIDERED – IN AN EXISTING FLOODING HOTSPOT

The proposed development on Brooklands Farm raises the risk of flooding in the surrounding areas. The farm's green fields currently act as natural drainage, absorbing excess rainwater during heavy rainfall and reducing the likelihood of severe flooding.

The surrounding areas are currently suffering from increased flooding year on year. There is already a worrying increase in the frequency of serious flooding across roads such as South Street, Chestfield Road, Grasmere Road and the Thanet Way itself following heavy rainfall. The proposed development area

covers Environment Agency Flood Zones 2 and 3. The roads in both neighbourhoods have become treacherous and increasingly unpassable after rain. The junction of South Street and the Chestfield Road becomes dangerous to cars following heavy rain and several cars, whose drivers mistakenly thought they could drive safely through such deep water are left stranded at the edge of the road each year. The fields within and external to Brooklands Farm become sodden after heavy rain. The stream running under South Street often reaches bursting point. Chestfield football pitch near where Molehill Road meets Chestfield Road is bordered on one side by houses with gardens that are under water after heavy rain. Check out the 'Save Brooklands Farmland' facebook site to see the photos.

Throughout the stream network within this area there are dangerous levels of water after heavy rain and some of the gardens on Grasmere Road are under water. Sandbags are a regular sight. Flooding is already a problem for the residents and the traffic wishing to pass and that is before any further intensive development of houses and industrial buildings and with the benefit of the current network of open fields that act as a soakaway. If 1,400 new houses are built, it will create an unacceptable flood risk. Any proposal to reduce the amount of natural soakaway in this area that is already struggling with the impact of several new housing estates (already mentioned), together with the general increase in flash flooding caused by climate change would be irresponsible. The Council includes details of the trees that will be planted, but the fields are what is needed in this area to stop a bad situation become a disastrous one.

FAILURE TO ADEQUATELY ADDRESS THE POTENTIAL SEWAGE ISSUES

Brooklands Farm is in an area that already faces challenges with sewage infrastructure.

'Whitstable SOS' is a pressure group successfully raising awareness of this. They are regularly featured in the local press and national news programmes.

The increased strain that would be caused by the development due to an additional 1,400 houses could lead to overflows, pollution of water sources and a decline in water quality. Our current system is already beyond capacity, discharging more into the rivers and sea at every available opportunity. Raw sewage is pumped into sea at Seasalter when the water levels rise due to heavy rain. It would be inappropriate and unacceptable to develop to the proposed extent in the area as the impact of increased development will ultimately mean more sewage ends up in the sea where families, young people and pensioners alike are enjoying themselves by paddling, sailing, kitesurfing, kayaking and wild swimming. This risk has an environmental and economic impact on the town.

IMPACT ON HISTORICAL SITE OF INTEREST

The historically significant Crab and Winkle Way (site of the oldest railway in the country), the historic listed buildings of the Brooklands farmhouse and those at the top of Rayham Road (Rayham Farm) would be in the middle of a huge housing estate rather than in the middle of a rural setting. This homogenising of a site of historical and cultural interest is unacceptable.

FAILURE TO TAKE ACCOUNT PREVIOUS CONCERNS RAISED IN PREVIOUS CONSULTATION ON THE DEVELOPMENT

I strongly opposed this planned development of Brooklands Farm via the last consultation process. My objection was one of many. Whereas another smaller proposed development in Chestfield has been omitted from this latest version of the Local Plan, the proposed development of the largest number of houses remains. Why has it not been significantly reduced or removed in its entirety from the Local Plan, due to the concerns of local people who responded to the previous consultation? There has been a lack of amendment to the plan to address the concerns raised. Due to the age demographic and relative wealth levels in the neighbourhoods that will be affected the most, I suspect there are a large number of residents

who live in these areas that are unlikely to be responding to this consultation or getting out to one of the Townhall Meetings.

The Council mentions in its responses to some of the objections in earlier consultations about maintaining habitats and landscapes, the recovery of nature and increasing biodiversity. This is comedic and of course, is simply inconsistent with the inevitable effects of a proposal to build 1,400 houses on Brooklands Farm and 2,000 additional houses in the woods around Blean.

The 'Local Plan' emphasises the open spaces that will be 'created' within the development. The undeniable irony is that the net effect of building 1,400 homes on Brookland farm will be a dramatic reduction in open spaces. I note that these are the open spaces that large percentages of the respondents to your Strategic Land Availability Assessments (July 2022) said should not be touched. **76%** of respondents supported protecting the environment, supporting wildlife and biodiversity. **68.2%** supported reducing the impact of climate change. It seems that the responses to the previous consultations prove that the respondents do not favour the overdevelopment of the unspoilt Kent countryside. The respondents favoured the development being on brownfield sites.

The Council states in its responses to some of the comments made by the public in earlier consultations on the Plan, that whilst Brownfield sites can be prioritised, not all brownfield sites are suitable and development on agricultural land will be required to meet the housing target set by government. There is insufficient evidence that all Brownfield sites have been located and assessed for suitability for development.

Any further development of houses in this district, absolutely should be undertaken on brownfield land, not on rural/agricultural land. The local towns and cities in Kent are finding that businesses can no longer afford the high rents in and around town. Why are those brownfield and urban sites not being developed to produce affordable housing for our youngsters? It seems that second homes and shared ownership schemes in fashionable Whitstable that will disadvantage families and young people are much more attractive to the developers. The motivation for decimating the countryside around Whitstable seems more about profit for developers.

The City Council's decision to sell prime real estate in the middle of Whitstable to the Green family at a gross undervalue, to allow them to create luxury seafront townhouses with a multimillion-pound price tag (hardly affordable homes for locals) was a very interesting decision. Why did the council not sell that land to developers to build a beautiful little development for the townsfolk?

Turning for one moment to the housing target set by the current government, as that is what is driving the ruination of the local Kent countryside and open spaces. There would be no need to develop more housing on the fields around Whitstable and Herne Bay's borders if so many houses in the desirable centre of Whitstable hadn't been bought for use as second or investment homes. If these houses were owned by locals, the locals would be able to live in them. Not only do Whitstable residents have to put up with the resulting rising house prices caused by the unchecked second or investment home owners, pricing their children out of getting on the local housing market, forcing them to have to live in the less desirable areas, anti-social litter problems on the roads in town and the beaches, anti-social noise levels from houses rented out by those who don't live in Whitstable via Airbnb and anti-social behaviour by those renting out the beach huts, traffic congestion in and around Whitstable before, during and after the summer. Now it is proposed that the local population will have their surrounding green fields decimated.

This is a proposal for new housing that would not be necessary if the Government imposed effective controls to deter second and investment homeowners decimating the character of a local area for their own enjoyment and additional income generation. Instead of decimating the local fields, I expect my local

Councillors to lobby the government to properly tax the second and investment homeowners to deter them from unsustainable actions that are to such detriment to local communities like ours.

Alison Sear

