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Objection to Policy W4 Land at Brooklands Farm.

I am writing to express my strong objection to the proposed housing development on Brooklands Farm. I strongly object to policies W3 and W4 (Brooklands Farm) of the draft Local Plan to 2040 for the following reasons:

- Loss of high quality agricultural land
- Loss of landscape
- Lack of infrastructure
- Negative impact on biodiversity
- Increased risk of flooding
- Sewage
- Traffic

Agricultural Land

Brooklands Farm is a much loved green field site, in a rural area with irreplaceable good quality agricultural land. Development here would result in the loss of “best and most versatile” agricultural land. When food security is a growing issue of concern nationally, it seems astonishing that this development is being proposed. The advent of the Ukraine War revealed how important domestic food production is within the UK.

Loss of Landscape

The proposed development would also lead to the loss of high-quality landscape with wonderful rural views of the distant 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.

In the EIA Scoping report, para 15.28 states: *The site (Brooklands Farm) is presently designated as forming part of the ‘Blean Woods’ Area of High Landscape Value (AHLV), but is recommended for removal within the council’s ‘Landscape Designations Review and Recommendations’ report and is omitted from this designated landscape within the policy maps supporting the emerging Local Plan*

The developers have recently submitted a preliminary planning application to Canterbury City Council, reference CA/24/00788. They concede that the site lies in an Area of High Landscape Value. They anticipate that "the proposed development will have significant effects on the local area". Even the developers are admitting the catastrophic impact!

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 proposed Brooklands development would destroy the rural nature of the valley of the Swalecliffe Brook, which provides the unofficial Green Belt between urban Whitstable and The Blean. (Why has CCC not provided this with protected status?)

During the COVID pandemic, Brooklands Farm was a valuable green space for local residents to walk in. It is a proven fact that green spaces are required for good mental health. The development of Brooklands Farm would be the loss of a local amenity for local residents.

Lack of infrastructure

The scale of development in Whitstable and the surrounding local areas is unsustainable. It lacks the infrastructure to support an ever growing population caused by constant development.

Local health services are already badly over-stretched with a failing hospital trust. Patients already are frequently unable to get beds in hospitals, and GP appointments often have to be made two weeks in advance. The vast increase in population has not been planned for by the local health service. There is no available space within existing health facilities to house the large number of extra GPs that would have to be recruited.

The local leisure amenities (swimming pool and gym) are already frequently operating at capacity. Where would all these new residents go to swim? Not in the sea as that will be filled with all their additional sewage. I am not aware of any plans to build a larger swimming pool.

Negative impact on biodiversity

Brooklands Farm currently offers a vital sanctuary for wildlife and contributes to the overall ecological balance of our community. This proposed development of 1400 houses (plus retail

and an educational establishment) would have a significant negative impact on local wildlife. The destruction of Brooklands Farm, this huge green space, would disrupt the delicate ecosystem that currently thrives in the area, resulting in the loss of biodiversity. There is a lot of insect life associated with the cattle of Brooklands Farm, and consequently there are swallows, house martins, wagtails and numerous bats. There is also wildlife on the arable fields, e.g. skylarks and hares. All this would be lost forever. The loss of open-landscape wildlife habitats would be catastrophic for genuine biodiversity. Destruction and damage of irreplaceable, natural habitats, including ancient hedgerows and the Swalecliffe Brook, would be unavoidable. Birds of prey, sparrow hawks & buzzards etc, use the hedgerows for hunting. An abundance of birds use the hedgerows for nesting. There are regular sightings of woodpeckers, greenfinches and goldfinches, and all the usual wild birds. South Street is well known locally for its population of hedgehogs (an endangered species). Developers do not take hedgehogs into consideration when erecting fencing. Hedgehogs need hedgerows. Preserving natural habitats is essential for maintaining a sustainable environment and ensuring the well-being of future generations and the survival of multiple endangered and threatened species.

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. The Environment Agency has said that it should be 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. A local resident recently described the brook that is in the dell of the farm as one of the last areas that the English Grey Partridge exists in.

Whitstable has already seen a massive amount of new housing built within a very small area. There are also multiple, additional development sites currently being planned. The **cumulative** impact of all this development is devastating. For example, hazel dormice will have to be moved from the W4 Brooklands Farm site, but they will also have to be removed from the W6 Bodkin Farm site. We will lose the skylarks at W4 Brooklands Farm, and we also have to lose them from the W5 site "Land South of Thanet Way". The residents of Whitstable are not only losing their wildlife but also their opportunity to be in contact with nature.

The building of 1,400 houses close to the Convicts Wood wildlife site would cause it to be severely degraded. It would likely be used as a children's recreation area and a place for dogs to defecate. Residents would use the area for dumping garden waste, as already happens in comparable areas along the Swalecliffe Brook. How many cats would arrive in the area with 1400 new houses? The impact on local wildlife would be significant as cats are well known for killing wildlife such as bats and mice.

Flooding.

The Brooklands Development brings the risk of significantly increased flooding on the farm, downstream in Chestfield, in Swalecliffe and in surrounding roads. The farm and local properties are inextricably linked. For example, in the 1950s, the farm sunk a deep well which caused a shallower well in a South Street property to dry up.

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.

There would be an increased flood risk downstream on the Swalecliffe Brook. At present heavy rain sits on the farmland before it slowly evaporates or trickles into Swalecliffe Brook. 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 2024.

Sewage

Brooklands Farm is situated in an area that already faces challenges with flooding & sewage. Southern Water is unable to cope with the present pressure it is under, let alone supplying an additional 1400 houses. 1400 more houses with one or two toilets will add to its already overstretched capacity. The local sewage works at Swalecliffe is already unable to cope with existing demand resulting in frequent releases into the sea, after even the lightest of rain falls. This has caused serious illness in some visitors to local beaches. The increased strain on the existing system due to the additional housing could lead to even more overflows, pollution of water sources (the Swalecliffe Brook also), and a decline in water quality. The new outfall under construction will not reduce the number of releases into the sea as it is not increasing capacity.

Whitstable is famous for its seafood but an increase in sewage releases would likely have a negative impact on this industry. More sewage means an increase in the already high number of sewage releases into the sea. Instances of beach closures due to poor quality bathing water will inevitably increase, and this will negatively impact tourism, a vital economic activity for the area.

Traffic

Brooklands Farm is not a sustainable place to build a large development, from which (if it is like the rest of south Chestfield) more people would be commuting to Canterbury than any other destination, almost all of them by car. It would contribute significantly to traffic congestion in the north Canterbury area. The idea that vast numbers of car drivers will be persuaded to switch to public transport is in my opinion extremely optimistic, many would say unrealistic.

Many of the roads in and around Whitstable are narrow and would be 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 location of many of these narrow roads makes them unsuitable for widening. Thus it would not be possible to have bus lanes and thus buses would sit in traffic jams, just like the cars!

The proposed new junction linking the A299 to Chestfield Rd and South Street would bring traffic onto roads that are ill equipped to deal with greater volumes of traffic. 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. I note that the developers are considering providing vehicular access to the site from Lismore Road, though this is not included in the draft local plan.

There has been a noticeable increase in congestion on the Old Thanet Way as residents have moved into some of the other new local housing developments. Local trade folk say that they have to allow much longer now when they are travelling to purchase materials. If the Brooklands and or Blean developments were to go ahead, there would be a significant increase of traffic on local roads. So far, CCC Local Plan traffic modelling has been totally inadequate so no one knows quite how bad the traffic situation will become.

In conclusion, CCC needs to recognise that housing developments affect the coastal towns much more severely than Canterbury. 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. 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.

Who are these houses being built for? Not local people. Whitstable is not the right place to build houses for Canterbury commuters or imported communities from London boroughs.

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

For the reasons listed above, the proposals would be unsustainable and would contravene paragraphs 135c, 168, 173, 180b, 180d and 191b of the Government's National Planning Policy Framework. I would like the plans to be dropped and consideration given to building the proposed housing in the Canterbury area where many of the potential new residents would be working.

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 taking the appropriate action.

Yours faithfully,

Catherine Jones

